

# Law Offices of Gregory J. Vogt, PLLC

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February 23, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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**Re: Application For Assignment Of Domestic Section 214 Authorizations  
Held By Sherburne Tele Systems, Inc. to Iowa Telecommunications Service,  
Inc., WC Docket No. 09-20**

Dear Ms. Dortch:

Iowa Telecommunications Services, Inc. (“Iowa Telecom”) and Sherburne Tele Systems, Inc. (“Sherburne”) filed the above-captioned application, dated February 9, 2009, to assign substantially all of the assets of Sherburne subsidiaries to Iowa Telecom subsidiaries. Iowa Telecom hereby files this letter as a supplement to this application to provide the following information.

Sherburne Tele Systems, Inc. is a holding company that does not itself provide telecommunications services. Rather, telecommunications services are provided by the subsidiaries identified in the application.

Iowa Telecom also clarifies that no competitive services offered by it as assignee would be provided in the area of any dominant carrier that is a party to this application as that phrase is used in 47 C.F.R. § 63.03(b)(2). NorthStar Access, LLC (“NorthStar”), which provides CLEC services today and is a subsidiary of Sherburne, does not compete in any territory where Iowa Telecom or any of its affiliates provides dominant local exchange services. Rather, NorthStar currently competes in territories where other dominant carriers operate, such as Qwest and Frontier.

For your information, the map attached as Appendix 1 shows the territory in which NorthStar currently provides services, an area which is north of the City of Minneapolis, and north and east of Interstate 94, in the State of Minnesota.

Iowa Telecom, through its wholly owned subsidiary Lakedale Telephone Company, operates as an ILEC in territories west of Minneapolis and west and south of Interstate 94 in the State of Minnesota. *See* map attached as Appendix 2. Thus, no NorthStar operations are in Lakedale Telephone territories. Iowa Telecom also

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operates rural exchanges throughout the State of Iowa in non-contiguous areas. NorthStar also does not operate in the State of Iowa.

Sherburne County Rural Telephone Company (“SCRTC”), another subsidiary of Sherburne, operates as an ILEC in a territory that is separate from the territory of NorthStar, but also wholly north and east of Interstate 94 in the State of Minnesota. *See* map attached as Appendix 2. As such, it is not contiguous with the territory of Lakedale Telephone Co. or any other Iowa Telecom ILEC. Further, neither Iowa Telecom nor any of its affiliates currently offers nondominant telecommunications service in SCRTC’s service territory.

Please let me know if you have any questions.

Sincerely,

*/s/ Gregory J. Vogt*

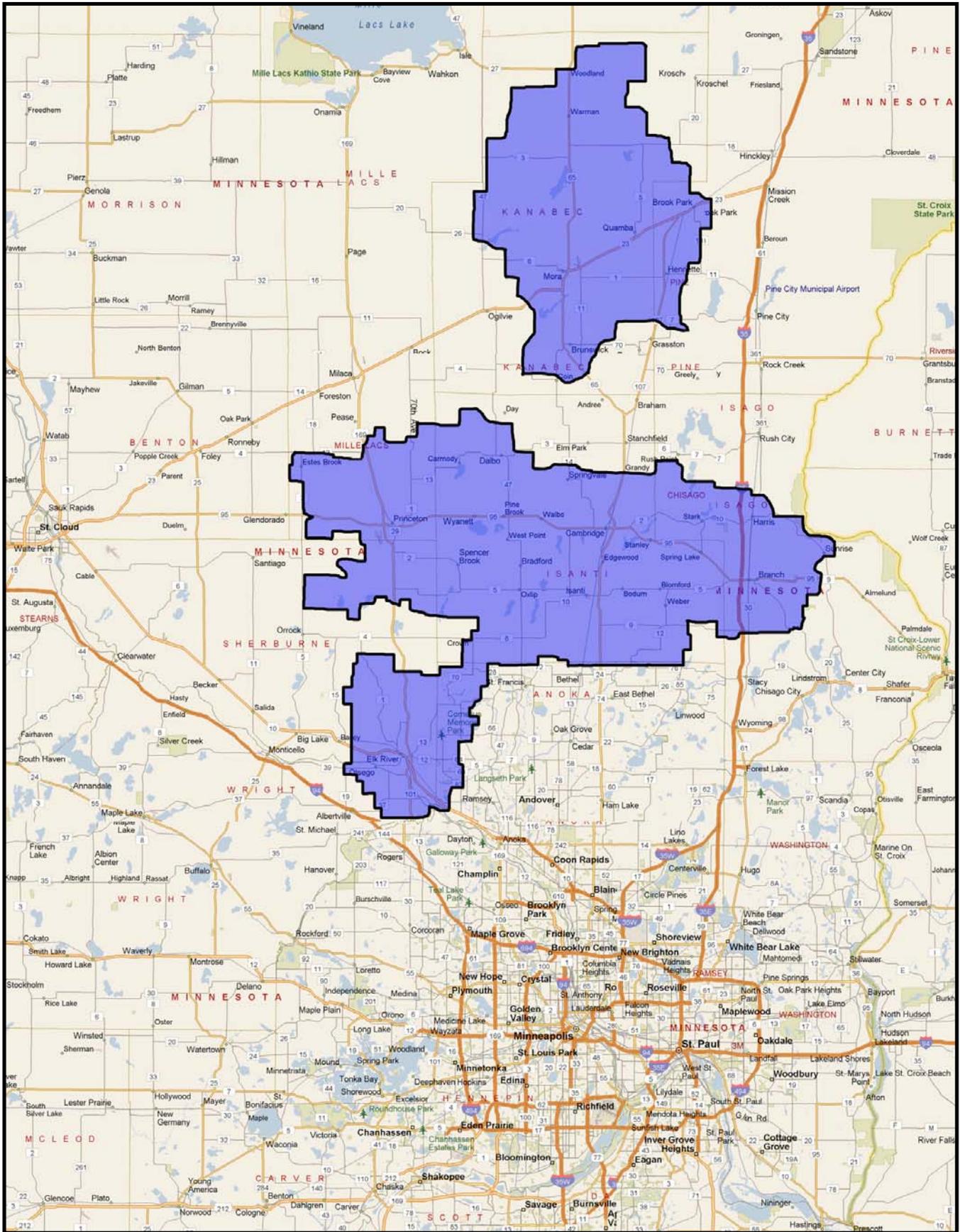
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Gregory J. Vogt  
Counsel for Iowa Telecommunications Services, Inc.

Attachments

cc: Jody May

# Appendix 1: NorthStar Access, LLC Service Area



Underlying map copyright © and (P) 1988–2006 Microsoft Corporation and/or its suppliers.

## Appendix 2: Sherburne County Rural Telephone Co. and Lakedale Telephone Co. Service Areas

