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March 2, 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 (“Application”), 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.

Bishop Communications Corp. (“Bishop”) is a wholly owned subsidiary of Iowa Telecom. Bishop does not provide telecommunications services, but rather is a holding company, which in turn owns other subsidiary corporations. *See* Exhibit 2 to the Application.

Bishop holds two competitive local exchange carriers (“CLECs”), with a 100 percent ownership interest in Lakedale Link, Inc. (“Lakedale Link”), and majority ownership interest in EN-TEL Communications, LLC (“EN-TEL”), both of whom are the only CLECs of Iowa Telecom that operate in Minnesota. Neither Lakedale Link nor EN-TEL operates in the service territory of Sherburne’s incumbent local exchange carrier (“ILEC”), Sherburne County Rural Telephone Co.

Lakedale Link in general does not operate in the service territory of NorthStar Access, LLC (“NorthStar”), the CLEC subsidiary of Sherburne. However, Lakedale Link does provide service to five residential customers in Elk River, Minnesota, a city of approximately 23,000 residents, which is in the service territory of NorthStar. EN-TEL does not provide service in NorthStar’s service territory.

This small overlap between Lakedale Link, Iowa Telecom’s existing CLEC operations in Minnesota, and NorthStar, Sherburne’s CLEC, of course, does not prevent the Application from being processed under the streamlined processing procedures specified in 47 C.F.R. § 63.03(b). In addition, the Elk River exchange

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continues to be served by the dominant ILEC, Qwest, as well as telecommunications services provided by Comcast Cable, Verizon Wireless, Sprint-Nextel Corp., and U.S. Cellular. Therefore, there will not be any adverse competitive consequences implicated by the acquisition in question because of the de minimis CLEC-to-CLEC overlap. The FCC has long held that minor competitive overlaps are of little competitive concern to the Commission and will not prevent a transaction from being approved. *See, e.g., In re Joint Applications of Telephone and Data Systems, Inc. and Chorus Communications, Ltd. for Authority to Transfer Control of Commission Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 22, 63 and 90 of the Commission's Rules*, 16 FCC Rcd. 15,293, ¶¶ 8-9 (CCB/WTB 2001).

Please let me know if you have any questions.

Sincerely,

/s/ Gregory J. Vogt

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

cc: Jody May