

WC 10-138

ntm-1665-4



Suite 800
1919 Pennsylvania Avenue NW
Washington, DC 20006-3401

Danielle Frappier
202 973 4242 (Tel)
202 973.4499 (Fax)

daniellefrappier@dwt.com

GRANTED

JUL 21 2010

July 15, 2010

COMPETITION POLICY DIVISION
WIRELINE COMPETITION BUREAU

STAMP & RETURN

VIA HAND DELIVERY

FOR 60 DAYS
Cross Hampton

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FILED/ACCEPTED

JUL 15 2010

Federal Communications Commission
Office of the Secretary

Re: Supplement to Request for Special Temporary Authority of William J. Bresnan Revocable Trust

Dear Ms. Dortch:

Pursuant to section 214(a) of the Communications Act of 1934, as amended,¹ and Sections 63.04 and 63.24 of the Commission's rules,² the William J. Bresnan Revocable Trust ("Trust"), filed a request on July 1, 2010 for Special Temporary Authority ("STA") for a period of 60 days to allow Bresnan Digital Services, LLC ("Bresnan Digital") and its local exchange carrier subsidiaries (Bresnan Broadband of Colorado, LLC, Bresnan Broadband of Montana, LLC, Bresnan Broadband of Wyoming, LLC and Bresnan Broadband of Utah, LCC) (collectively, the "Licensees") to continue to provide interstate telecommunications services pending Commission action on the application to transfer control of the Licensees to the Trust (which has now been assigned WCB Docket No. 10-138).³ Bureau staff have asked for certain supplemental information, which is provided below. Bresnan Digital also repeats the substantive information included in its original request so that Bureau staff have all necessary information on one document.⁴

¹ 47 U.S.C. § 214(a).

² 47 C.F.R. §§ 63.04, 63.24.

³ A copy of the July 1 request is attached, which includes the organization chart that Bresnan Digital submitted as an attachment to its International 214 application in November 2006. See File No. ITC-214-20061117-00525. The Licensees are identified as the "Telephony Subsidiaries" in the chart. BCI is identified as the "Manager" of Bresnan Holdings.

⁴ The International Bureau granted on July 13, 2010 an STA to allow the Licensees to continue to provide international telecommunications services. A copy of this grant is attached.

The supplemental information requested is as follows: Licensees acknowledge that grant of the STA request will not prejudice any action the Commission may take on the underlying application for Commission authorization. Licensees further acknowledge that the STA may be revoked by the Commission upon its own motion without a hearing.

The rest of the information below has been previously provided.

Licensees are non-dominant telecommunications carriers holding blanket domestic and international Section 214 authorization from the Commission to provide interstate and international telecommunications services under Section 63.01 and 63.18 of the Commission's rules.⁵

Prior to his death, Mr. Bresnan directly owned 100% of Bresnan Communications, Inc. ("BCI") and served as its sole director.⁶ Pursuant to a management agreement between BCI and Bresnan Broadband Holdings, LLC ("Bresnan Holdings"), Mr. Bresnan, through BCI, exercised control over Bresnan Holdings and all of its subsidiaries, including the Licensees. As a result of Mr. Bresnan's death on November 29, 2010, control over BCI, and as a result, management control over the Licensees, transferred from Mr. Bresnan to the Trust. The co-trustees of the Trust are Mr. Jeffrey S. DeMond and J.P. Morgan Chase Bank, N.A.

The Applicants note that this request is unrelated to the application to transfer control of Licensees to Cablevision Systems Corporation.

Very truly yours,

DAVIS WRIGHT TREMAINE LLP



Danielle Frappier

Attachments

⁵ 47 C.F.R. §§ 63.01, 63.18.

⁶ In October 2009, as part of estate preparations prior to his death, Mr. Bresnan transferred his ownership interest in BCI to the Trust. Because the Trust was revocable, and because Mr. Bresnan continued to be the beneficial owner of 100% of the BCI interests through his control of the Trust, management believed the transfer of BCI to the Trust to be a non-cognizable event under the Commission's transfer of control and ownership rules.



STAMP AND RETURN

Suite 800
1919 Pennsylvania Avenue NW
Washington, DC 20006-3401

Michael C. Sloan
202.973.4227 (Tel)
202.973.4499 (Fax)

michaelsloan@dwt.com

July 1, 2010

VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FILED/ACCEPTED

JUL 1 2010

Federal Communications Commission
Office of the Secretary

Re: Request for Special Temporary Authority of William J. Bresnan Revocable Trust

Dear Ms. Dortch:

Pursuant to section 214(a) of the Communications Act of 1934, as amended,¹ and Sections 63.04 and 63.24 of the Commission's rules,² the William J. Bresnan Revocable Trust ("Trust"), through undersigned counsel, hereby requests Special Temporary Authority ("STA") for a period of 60 days to allow Bresnan Digital Services, LLC ("Bresnan Digital") and its local exchange carrier subsidiaries (Bresnan Broadband of Colorado, LLC, Bresnan Broadband of Montana, LLC, Bresnan Broadband of Wyoming, LLC and Bresnan Broadband of Utah, LLC) (collectively, the "Licensees") to continue to provide interstate telecommunications services pending Commission action on the application to transfer control of the Licensees to the Trust.³ That application is being filed with the Commission today or will be in the very near future. A similar request for special temporary authority is also being filed with the International Bureau.

Licensees are non-dominant telecommunications carriers holding blanket domestic and international Section 214 authorization from the Commission to provide interstate and international telecommunications services under Section 63.01 and 63.18 of the Commission's rules.⁴

¹ 47 U.S.C. § 214(a).

² 47 C.F.R. §§ 63.04, 63.24.

³ Attached hereto as an exhibit is the organization chart that Bresnan Digital submitted as an attachment to its International 214 application in November 2006. See File No. ITC-214-20061117-00525. The Licensees are identified as the "Telephony Subsidiaries" in the chart. BCI is identified as the "Manager" of Bresnan Holdings.

⁴ 47 C.F.R. §§ 63.01, 63.18.

Marlene H. Dortch
June 30, 2010
Page 2 of 2

Prior to his death, Mr. Bresnan directly owned 100% of Bresnan Communications, Inc. ("BCI") and served as its sole director.⁵ Pursuant to a management agreement between BCI and Bresnan Broadband Holdings, LLC ("Bresnan Holdings"), Mr. Bresnan, through BCI, exercised control over Bresnan Holdings and all of its subsidiaries, including the Licensees. As a result of Mr. Bresnan's death on November 29, 2010, control over BCI, and as a result, management control over the Licensees, transferred from Mr. Bresnan to the Trust. The co-trustees of the Trust are Mr. Jeffrey S. DeMond and J.P. Morgan Chase Bank, N.A.

The Applicants note that this request is unrelated to the application to transfer control of Licensees to Cablevision Systems Corporation.

Very truly yours,

DAVIS WRIGHT TREMAINE LLP



Michael C. Sloan
Danielle Frappier

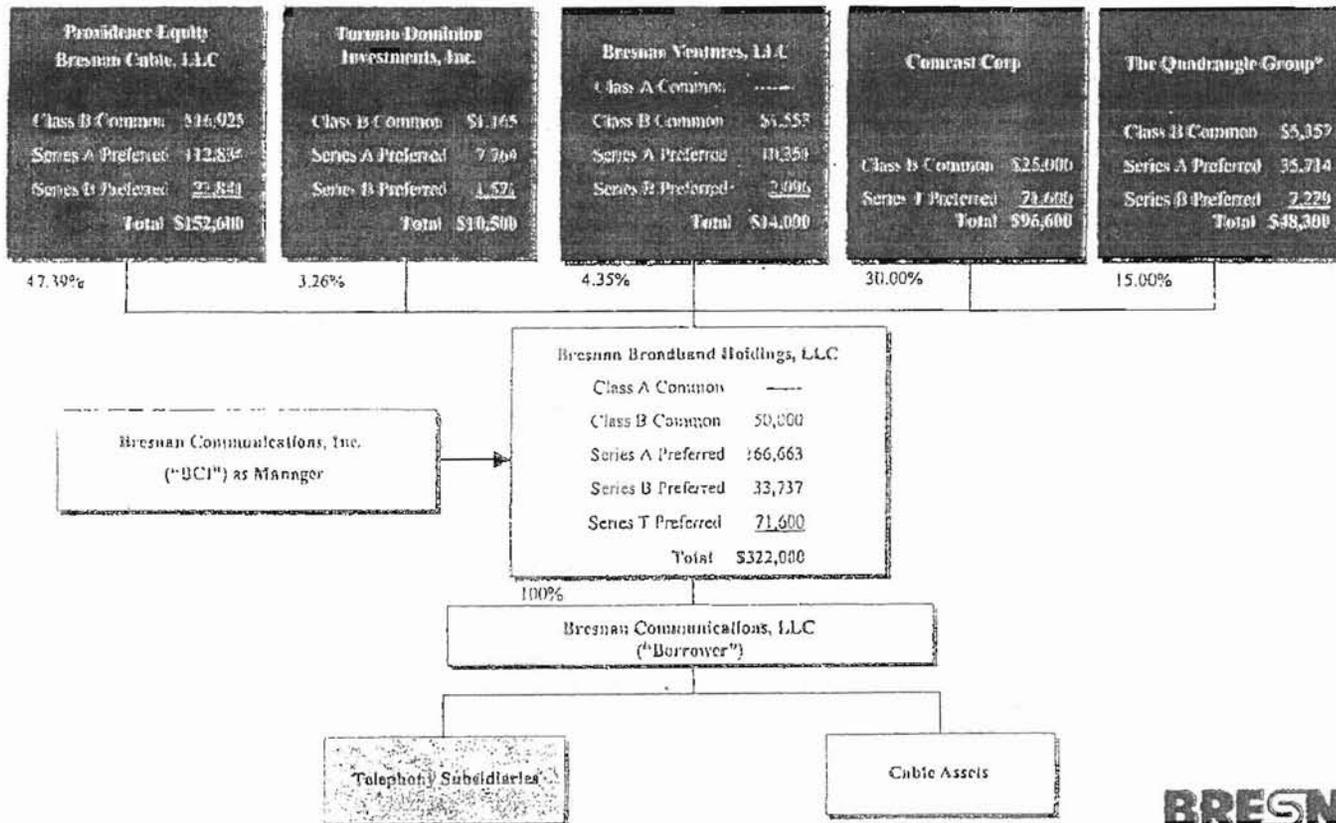
Attachment.

⁵ In October 2009, as part of estate preparations prior to his death, Mr. Bresnan transferred his ownership interest in BCI to the Trust. Because the Trust was revocable, and because Mr. Bresnan continued to be the beneficial owner of 100% of the BCI interests through his control of the Trust, management believed the transfer of BCI to the Trust to be a non-cognizable event under the Commission's transfer of control and ownership rules.

252-418-2824
 Mikelle Morra

Pro Forma Organizational Structure

\$ in thousands



BRESNAN
 Communications

Streamlined

ITC-STA-20100701-00268

IB2010002117

Bresnan Digital Services, LLC

Approved by OMB

3060-0686

Re: ITC-10-20100701-00268

**INTERNATIONAL SECTION 214 SPECIAL TEMPORARY AUTHORITY APPLICATION
FCC FORM 214STA
FOR OFFICIAL USE ONLY**

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

Pursuant to 63.25 of the Commission's rules, Bresnan Digital Services, LLC seeks special temporary authority to provide services consistent with authorization ITC-214-2006117-00525 until the Commission rules on transfer of control application being filed concurrently with this application

1. Applicant			
Name:	Bresnan Digital Services, LLC	Phone Number:	914-641-3338
DBA Name:		Fax Number:	
Street:	One Manhattanville Road	E-Mail:	
City:	Purchase	State:	NY
Country:	USA	Zipcode:	10577 -
Attention:	Jerold Lambert		
2. Contact			
Name:	Danielle Frappier	Phone Number:	202-973-4242
Company:	Davis Wright Tremaine	Fax Number:	- 4499
Street:	1919 Pennsylvania Ave NW Suite 800	E-Mail:	daniellefrappier@dwt.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -3401
Contact Title:		Relationship:	Legal Counsel

Granted 13 2010
Policy Division
International Bureau

date: Expire: JAN. 9, 2011

authorized by:
Chief, Policy Div. IB

James L. Ball
Signature

Applicants acknowledge the conditions of STA as stated in the Supplement filed on July 9, 2010.