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September 20, 2010

BY IBFS AND ECFS

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

Re: Request for Special Temporary Authority (Assignment of Domestic and International Section 214 Authorizations)
WC Docket No. 10-173; IB File No. ITC-ASG-20100823-00345

Dear Ms. Dortch:

SE Acquisitions, LLC ("SEA") and SouthEast Telephone, Inc. (Debtor-in-Possession) ("SouthEast," and together with SEA, the "Applicants"), pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04 & 63.24, respectfully request expedited Special Temporary Authority ("STA") to permit them to consummate a transaction no later than October 1, 2010, whereby SouthEast will transfer substantially all of its assets, including its domestic and international Section 214 authorizations, to SEA.

Applicants filed applications on August 23, 2010 requesting Commission approval of the proposed transaction and assignment of SouthEast's international Section 214 authorization to SEA.¹ Their application for approval to transfer the domestic

¹ Applicants note that prior to filing the applications for approval of the transfer to SEA, SouthEast filed *pro forma* notifications of (1) its Chapter 11 filing with the Commission on August 20, 2010 and (2) with respect to its International 214 Authorization, a change in its corporate form from a limited partnership to a corporation. As those notices were *pro forma* in nature, Applicants expect that they will be granted prior to October 1. To the extent that is not the

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Ms. Marlene H. Dortch
September 20, 2010
Page 2

Section 214 authorization was placed on public notice by the Commission on September 7, 2010 (WC Docket No. 10-173, DA 10-1698), and Applicants are awaiting the issuance of a public notice of their application for approval to transfer SouthEast's international Section 214 authorization, which notice was delayed by the inadvertent late submission of certain regulatory fees by SouthEast.

As stated in their transfer applications, on September 28, 2009, SouthEast filed a voluntary petition for relief under Chapter 11 of Title 11, U.S.C. §§ 101, et seq., as amended, in the United States Bankruptcy Court for the Eastern District of Kentucky, Pikeville Division (Case No. 09-70731-WSH). The Bankruptcy Court subsequently issued a Sale Order approving the sale of substantially all of the assets of SouthEast, including SouthEast's telecommunications equipment and business, to SEA on August 16, 2010. SouthEast's customers were subsequently notified by letter that the transfer of their service will occur on or about October 1, 2010.

As a Debtor and Debtor-in-Possession, SouthEast continues to operate its business and provide telecommunications services to its customers pending the closing. As the Commission will fully understand, however, there are continuing concerns about SouthEast's cash needs to operate and sustain the business during this period. Moreover, SouthEast's financial position and its bankruptcy have created serious uncertainties among its customers and vendors that Applicants want to remedy so that the business can return to operating in the normal course and without any threat of interruption of service. Commission grant of an STA enabling the parties to close on October 1, the first day of the calendar year fourth quarter, will also allow for the accounting changeover from the bankrupt entity to SEA to be as straightforward as possible, and is consistent with the notice provided to customers as to the anticipated transfer date.

Accordingly, Applicants respectfully request grant of this STA request so that SEA can close the transaction on October 1 and thereby begin to fund the business and continue providing services to SouthEast customers. Applicants note that the comment period with respect to the domestic transfer application will have closed by September 21, and although they do not anticipate any comments, a grant of the requested STA after that date will have afforded the Commission an opportunity to assess whether and what comments may have been filed. And, particularly in light of the fact that the comment date for the international application may not have closed by October 1, Applicants also hereby acknowledge that grant of this request will not prejudice action by the Commission on the underlying Application and that any authority granted pursuant to this

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case, however, Applicants ask that those approvals be included s part of the STA requested in this letter.

Ms. Marlene H. Dortch
September 20, 2010
Page 3

request is subject to cancellation or modification upon notice but without a hearing. We request that the STA be granted for a period of sixty (60) days to permit the Commission to complete its processing of the pending transfer applications in due course.

Should you have any questions or require further information, please do not hesitate to contact us.

Respectfully submitted,

/s/ Jean L. Kiddoo

Jean L. Kiddoo
Brett P. Ferenchak

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