

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	WC Docket No. 09-197
)	
)	
Petition for Forbearance of)	
Zefcom, LLC d/b/a Telispire PCS)	
)	

MOTION TO WITHDRAW PETITION FOR FORBEARANCE

Zefcom, LLC d/b/a Telispire PCS (“Telispire”), by its attorneys and pursuant to Section 1.59 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules, hereby seeks leave to withdraw the above-referenced Petition for Forbearance (filed January 13, 2011) and requests that the Commission dismiss the petition without prejudice. Based on conversations with Commission staff, it is Telispire’s understanding that the Commission would prefer that forbearance relief be sought by the individual Mobile Virtual Network Operators (“MVNOs”) for whom Telispire acts as a Mobile Virtual Network Enabler (“MVNE”) rather than by Telispire, and accordingly Telispire seeks dismissal of the petition.

Respectfully submitted,

ZEFCOM, LLC D/B/A TELISPIRE[®] PCS

/s/ Caressa D. Bennet

Caressa D. Bennet
Michael R. Bennet
Bennet & Bennet, PLLC
4350 East West Highway, Suite 201
Bethesda, MD 20814
(202) 371-1500
Its Attorneys

November 14, 2011

APPENDIX

SCOPE OF RELIEF SOUGHT

Pursuant to Section 1.54(e) of the Rules and Regulations of the Federal Communications Commission, Zefcom, LLC d/b/a Telispire PCS (“Telispire”) hereby provides the following information regarding the scope of relief sought. Telispire is seeking forbearance from Section 214(3)(1)(A) of the Communications Act of 1934, as amended (“Act”), and Sections 254.201(d)(1) and 54.201(i) of the Federal Communications Commission’s rules. Telispire requests forbearance on behalf of all MVNOs seeking to provide Lifeline-only service. Telispire requests forbearance with respect to the provision of commercial mobile radio service. Telispire seeks forbearance with respect to all states in which an MVNO will seek designation as an ETC from the relevant state commission.

All supporting data upon which Telispire intends to rely is included in the preceding pages. Telispire is not relying on any separate market analysis.

4821-5447-7064, v. 1