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

**RE: WC Docket No. 13-55
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
(DOMESTIC SECTION 214 AUTHORIZATION)**

Dear Ms. Dortch:

On behalf of Hector Communications Corporation ("Hector"); Blue Earth Valley Communications, Inc. ("Blue Earth Valley"); Arvig Enterprises, Inc. ("Arvig"); and New Ulm Telecom, Inc. ("New Ulm"), special temporary authority is hereby requested to permit continued domestic telecommunications service operations by eleven former subsidiaries of Hector that hold Domestic Section 214 Authorizations and that were distributed to Blue Earth Valley, Arvig or New Ulm on December 31, 2012 pursuant to a reorganization under Section 355 of the Internal Revenue Code.

Specifically, Blue Earth Valley, Arvig and New Ulm (which each operate rural telephone companies and other entities in their own right and which were each formerly 33.33 percent stockholders of Hector) decided to dissolve Hector and to distribute Hector's eleven operating subsidiaries to the Hector stockholder that was the closest from a geographic standpoint and most capable of assuming full operational control with little or no disruption. As a result of the Hector reorganization: (a) six of the Domestic Section 214 Authorization holders -- Granada Telephone Company, Hager Telecom, Inc., Indianhead Telephone Company, Pine Island Telephone Company, Cannon Communications Corp. and Indianhead Communications Company -- were distributed to BCS Holdings, LLC ("BCS"), a wholly-owned subsidiary of Blue Earth Valley; (b) Alliance Telecommunications Corporation, an intermediate subsidiary that owns four of the Domestic Section 214 Authorization holders -- Arrowhead Communications Corp., Eagle Valley Telephone Company, Felton Telephone Company and Loretel Systems, Inc. -- was distributed to Arvig; and (c) Sleepy Eye Telephone Company was distributed to New Ulm.

As 33.33 percent stockholders of Hector, Blue Earth Valley, Arvig and New Ulm were involved in various aspects of the operations of the eleven affiliates prior to the reorganization. Subsequently, the Blue Earth Valley, Arvig and New Ulm organizations are each involved in the management and supervision of all of the operations of the specific former Hector affiliates that were distributed to them in the reorganization.

During the course of the reorganization, Hector's corporate and tax attorneys and accountants focused upon the internal Hector reorganization from a tax standpoint, and it was assumed by these advisors, as well as by Hector, Blue Earth Valley, Arvig and New Ulm, that the reorganization was a *pro forma* transaction among the existing and FCC-approved owners of Hector and did not require prior FCC approval. It was not until more than a month after the December 31, 2012 completion of the reorganization that one of Hector's stockholders mentioned the transaction in another context to FCC counsel, and was told that it may have required FCC consent or notice.

The subject application in this docket for Domestic Section 214 Authorization for any and all non-*pro forma* transfers of control was promptly prepared, executed and filed with the Commission's depository bank on February 20, 2013. Other related applications have been conditionally filed with the International Bureau and are being readied for filing with the Wireless Telecommunications Bureau.

Whereas Hector is being dissolved and will no longer be holding or acquiring FCC authorizations, Blue Earth Valley, Arvig and New Ulm are now fully aware that they need to carefully check the FCC authorization and filing requirements with respect to any and all future transactions. In their defense, the Section 355 reorganization of Hector was a major undertaking at the end of 2012. Blue Earth Valley, Arvig and New Ulm did inquire of the corporate and tax attorneys handling the transaction whether FCC authorization was required, and were told that the transaction was *pro forma* and did not require FCC applications or approvals. Unfortunately, the attorneys handling the transaction were very busy with its corporate and tax details and were not very experienced with FCC requirements. In the future, Blue Earth Valley, Arvig and New Ulm will check the FCC filing requirements for their proposed transactions with experienced FCC counsel and/or consultants.

At the present time, the nine former Hector subsidiaries that are local exchange carriers serve approximately 22,000 access lines and approximately the same numbers of local exchange service customers. The two interexchange carriers, Cannon Communications Corp. and Indianhead Communications Company, provide interstate long distance toll services to some of these local exchange customers. The Hector reorganization was undertaken, in major part, to distribute these subsidiaries to the Hector stockholder that was the closest from a geographic standpoint and most capable of assuming full operational control with little or no disruption. The requested Special Temporary Authority is needed to permit these operations to continue without disruption while the Domestic Section 214 Application ("Application") in this docket is being processed.

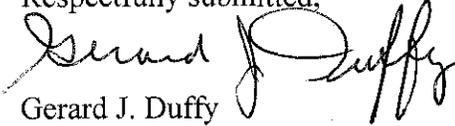
Blue Earth Valley, Arvig and New Ulm acknowledge that grant of this Request for Special Temporary Authority ("STA") will not prejudice any action the Commission may take on the Application and that, once granted, the STA may be revoked on the Commission's own notice,

without hearing. Blue Earth Valley, Arvig and New Ulm further acknowledge that grant of an STA and of the Application will neither preclude nor dictate the scope of any enforcement action related to the underlying transaction.

Given the inadvertent and unintentional nature of the failure of the applicants to seek prior Commission approval of the Section 355 reorganization, the need to maintain reliable service to the approximately 22,000 affected customers, and the implementation by the applicants of procedures to review future transactions with experienced FCC counsel and/or consultants, it is respectfully submitted that good cause exists for grant of the present STA request as expeditiously as possible.

If there are any questions regarding this matter, please contact undersigned counsel.

Respectfully submitted,


Gerard J. Duffy

cc: Jodie May, Esquire
Tracy Wilson, Esquire