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COMMISSION
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William A. Lewis

April 10, 2013

BY ECFS

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

Re: Request for Special Temporary Authority
WC Docket No. 13-78 - Assignment of Domestic Section 214 Authorization

Dear Ms. Dortch:

On March 15 and 18, 2013, TNCI Operating Company LLC (“TNCI-OpCo”) and Trans National Communications International, Inc. (Debtor-in-Possession) (“TNCI-DIP” and together with TNCI-OpCo, “Applicants”) filed Applications requesting Commission approval for a transaction whereby TNCI-OpCo will acquire certain of the assets (including the customers and domestic and international section 214 authorizations) of TNCI-DIP through a sale pursuant to Section 363 of the United States Bankruptcy Code (the “Transaction”).¹ As stated in the Applications, Applicants have scheduled their initial closing for April 30, 2013. However, the notice period initiated by the April 9, 2013 release of the public notice of the Domestic 214 Application (DA 13-672) will not end until May 10, 2013. Accordingly, absent special temporary authority (“STA”), approval of the Domestic 214 Application will not be granted in time for the scheduled April 30 closing.

Applicants understand that the Commission will likely issue a public notice accepting the International 214 Application for filing on April 12, 2013 which, given a 14-day comment period, would allow for automatic approval prior to the scheduled April

¹ The Domestic Section 214 Application was filed on March 18, 2013 and has been assigned WC Docket No. 13-78 (“Domestic 214 Application”). The International Section 214 Application was filed on March 15, 2013 and has been assigned IB File No. ITC-ASG-20130315-00078 (“International 214 Application”).

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TNCI-DIP customers as of May 1. Applicants do not expect that there will be any comments or protests filed with respect to the Transaction approved by the Bankruptcy Court, but we note that the comment periods with respect to both the Domestic 214 Application and, we expect, the International 214 Application, will have ended before April 30, a grant of the requested STA effective April 30 will afford the Commission an opportunity to assess whether and what comments, if any, may have been filed. Moreover, Applicants expressly acknowledge that grant of this request will not prejudice action by the Commission on the underlying Domestic 214 Application and that any authority granted pursuant to this 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 Domestic 214 Application 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

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Counsel for TNCI-OpCo

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