

ATTACHMENT TO FOREIGN AFFILIATION NOTIFICATION

Background

On December 1, 2011, Windstream Corporation (“Windstream”) and PAETEC Holding Corp. (“PAETEC”) completed a transfer of control of PAETEC’s subsidiaries from PAETEC to Windstream. The Commission approved the associated transfer of control of PAETEC’s subsidiaries that hold International Section 214 authorizations in IB File Nos. ITC-T/C-20110819-00269, ITC-T/C-20110819-00270, ITC-T/C-20110819-00271, ITC-T/C-20110819-00272, ITC-T/C-20110819-00273, ITC-T/C-20110819-00274, ITC-T/C-20110819-00275, ITC-T/C-20110819-00276, ITC-T/C-20110819-00277 and ITC-T/C-20110819-00278 (the “International 214 Applications”). The International 214 Applications disclosed that one of PAETEC’s subsidiaries, Intellifiber Networks, Inc. (“Intellifiber”), is a foreign carrier in Canada¹ and that as a result of the Transaction Windstream and Windstream’s subsidiaries listed below that hold International Section 214 authorizations (the “Windstream Licensees”) have become affiliated with a foreign carrier in Canada.²

Carrier	FRN	International Section 214 Authorization
Windstream Communications, Inc.	0015343635	ITC-214-20060816-00433
VALOR TELECOMMUNICATIONS LD, LLC	0003783123	ITC-214-20000719-00451
Advanced Tel-Com Systems, L.P.	0008229429	ITC-214-19981110-00835
Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless	0006157887	ITC-214-20010802-00418
CGKC&H No. 2 Rural Cellular Limited Partnership	0004544714	ITC-214-20060501-00261
CT Communications, Inc.	0004215794	ITC-214-19930405-00054
D&E SYSTEMS, INC.	0003735776	ITC-214-19970707-00382
Lexcom Long Distance, LLC	0004291969	ITC-214-19930302-00003
Windstream Iowa Communications, Inc.	0019527837	ITC-214-20000627-00408 ITC-214-19961219-00634 ITC-214-20080709-00316 ITC-214-20010501-00266
Iowa Telecom Communications, Inc.	0005089446	ITC-214-20010823-00464
IT Communications, LLC	0013623335	ITC-214-20050906-00360

¹ See Attachment 1 to the International 214 Applications at 4 (“Intellifiber Networks, Inc. ... holds a Basic International Telecommunications Services (“BITS”) license, granted by the Canadian Radio-television and Telecommunications Commission (“CRTC”), to provide international service in Canada, and is registered with the CRTC as a non-facilities-based reseller of telecommunications services.”).

² See Attachment 1 to the International 214 Applications at 19. Prior to consummation of the Windstream-PAETEC transfer of control, each of PAETEC’s own subsidiaries with International Section 214 authorizations filed separate foreign carrier affiliate notifications disclosing their affiliation with Intellifiber Networks, Inc., the same foreign carrier that has prompted this filing. See IB File Nos. FCN-NEW-20111116-00021, FCN-NEW-20111116-00018, FCN-NEW-20111116-00019, FCN-NEW-20111116-00020, and FCN-NEW-20111116-00022.

Carrier	FRN	International Section 214 Authorization
Lakedale Link, Inc.	0003738424	ITC-214-19960725-00339
EN-TEL Communications, LLC	0003738465	ITC-214-20010501-00265
NUVOX, INC.	0006556419	ITC-214-19990323-00165
Norlight, Inc. f/k/a Cinergy Communications Company	0007345754	ITC-214-19960826-00406 ITC-214-19960826-00407 ITC-214-19940224-00080

Response to Questions 12, 16 and 17

The Windstream Licensees provide notification of their affiliation with the following foreign carrier:

Country	Affiliate Name	Description of the Company
Canada (WTO Member)	Intellifiber Networks, Inc. (f/k/a Elantic Telecom, Inc.)	The Windstream Licensees and Intellifiber are each wholly-owned indirect subsidiaries of Windstream. Intellifiber has a market share of less than 5% of the telecommunications market in Canada.

The Windstream Licensees request continued classification as nondominant carriers under Section 63.10 of the Commission’s Rules on all routes between the United States and Canada. Intellifiber lacks 50 percent market share in the international transport and local access markets on the foreign end of the route and thus lacks sufficient market power on the foreign end to adversely affect competition in the U.S. market. Accordingly, pursuant to Section 63.10(a)(3), the Windstream Licensees are presumptively classified as non-dominant on these routes.

Response to Question 18

Please see the list of International Section 214 authorizations held by the Windstream Licensees provided in the “Background” section above.

Response to Question 19

The Windstream Licensees provide service between the United States and Canada only through the resale of international switched services of unaffiliated U.S. facilities-based carriers.

Response to Question 20

Windstream and the Windstream Licensees acquired direct ownership of PAETEC and indirect ownership of Intellifiber. See IB File Nos. ITC-T/C-20110819-00269, ITC-T/C-20110819-00270, ITC-T/C-20110819-00271, ITC-T/C-20110819-00272, ITC-T/C-20110819-00273, ITC-T/C-20110819-00274, ITC-T/C-20110819-00275, ITC-T/C-20110819-00276, ITC-

T/C-20110819-00277 and ITC-T/C-20110819-00278. The post-transaction ownership of the Windstream Licensees is provided in those applications and is incorporated by reference herein.

Windstream is a publicly held corporation. To Windstream's knowledge, no person or entity directly or indirectly owns or controls a ten percent (10%) or more interest in Windstream.

Response to Question 21:

Windstream, the Windstream Licensees and Intellifiber all have identical officers and directors and therefore have interlocking directorates with each other.