

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER, JR.

2120 L STREET, NW
WASHINGTON, DC 20037

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY
OF COUNSEL

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

ARTHUR BLOOSTON
1914 – 1999

December 21, 2015

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com
202-828-5562

VIA IBFS

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

Re: Townes Telecommunications, Inc.
File Nos. ITC-T/C-20050324-00121, ITC-214-19970710-00392
Modification Request

Dear Mr. Dortch:

Townes Telecommunications, Inc. (“Townes”), by its attorneys, hereby requests the Commission modify its above-referenced authorization to remove the condition requiring compliance with the Letter of Assurance dated May 6, 2005.¹ As described in greater detail below, the authorization has since been transferred to Townes, a corporation 100% owned by U.S. citizen shareholders and, as such, the Letter of Assurance condition is no longer necessary.

On May 6, 2005, Pymatuning Holding Company, Inc. (PHC) entered into an agreement with the U.S. Departments of Justice and Homeland Security and the Federal Bureau of Investigation (collectively “USG Agencies”) in order to address national security, law enforcement and public safety concerns relating to PHC’s 2005 transfer of control application with the Federal Communications Commission. In 2009, Pymatuning Independent Telephone Company (PITC) filed an application with the FCC to transfer control from Pymatuning Holding Company (PHC) to Townes. PHC retained no interest in PITC and Townes is a corporation

¹ According to Commission Staff, a copy of the Letter of Assurance is not readily available. As such, Townes was instructed to file the instant letter without one.

100% owned by U.S. citizen shareholders. As such, the USG Agencies have indicated they would have no objection to removing the 2005 Letter of Assurances as a condition on the FCC authorization.

Attached is a Declaration Under Penalty of Perjury in support of the factual statements contained in this letter. A copy of this letter is being filed in file no. ITC-T/C-20050324-00121 for recordkeeping purposes. If you have any questions, please do not hesitate to contact the firm directly.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Dickens, Jr.", written in a cursive style.

Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.

Counsel to
Townes Telecommunications, Inc.

Cc: Johnny Ross

DECLARATION UNDER PENALTY OF PERJURY

I, Johnny Ross, hereby state the following:

1. I am the General Manager of Townes Telecommunications, Inc.

2. I have read the foregoing modification request, which was prepared under my direction and supervision.

3. I certify under penalty of perjury that the factual statements contained therein are true and correct to the best of my knowledge, information, and belief.

Signed: _____

Johnny Ross

Executed this 9 day of December, 2015

