

**Section 214 Application for
Special Temporary Authority
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Yukon-Waltz Communications, Inc.

Response to Question 10:

Yukon-Waltz Communications, Inc. (“YWCI”) respectfully submits that the public interest would be served by a grant of this Special Temporary Authority (“STA”) pending grant of its application for Section 63.18(e)(2) (global resale authority) filed simultaneously herewith. A grant of this STA will allow YWCI to continue to provide resold international long distance service until such time as its application for permanent Section 63.18(e)(2) is granted. Thus, prompt action granting this STA will allow YWCI’s customers to continue to utilize the international long distance service offered by YWCI.

Through an apparent oversight as described below, YCWI had not obtained the necessary global resale authority when it began operations in 1997. YWCI regrets its oversight and is now trying to correct it. During the time required by YWCI to correct this situation, YWCI respectfully submits that its customers should not be adversely affected. Although the level of billed international long distance traffic for recent years has been less than \$1,000 on an annual basis, the public interest would be served by avoiding the inconvenience to YWCI’s customers that would result should this STA not be granted promptly.

As explained informally to the Commission Staff, YCWI is a wholly-owned subsidiary of Yukon-Waltz Telephone Company, Inc. (“Yukon”). Yukon has entered into a stock purchase agreement with Laurel Highland Total Communications, Inc. (“LHTC”) which, when consummated, would result in Yukon and YWCI becoming controlled by LHTC. Consummation of the Yukon and LHTC transaction is subject to the receipt of all necessary approvals. As part of the due diligence process arising from this proposed transaction, it was discovered that YWCI did not have the necessary Commission authority to provide international resale long distance service. Prior to this discovery, Yukon’s current shareholders believed in good faith that YWCI was operating with all necessary Commission authorizations. Complicating the ability of the shareholders of Yukon (and thus YWCI) to uncover how this could have occurred is the fact that one of its shareholders, John S. Rucker, has died. It was Mr. Rucker who, prior to his death, oversaw the day-to-day operations of Yukon and of YCWI since its inception. Once the lack of international Section 214 authority was uncovered and actions taken to verify the fact that such authority did not exist, YWCI brought this matter to the Commission’s attention and proceeded to file the necessary applications to rectify this situation.

Under these circumstances and coupled with the consumer inconvenience that would result absent a grant of this request, YCWI respectfully submits that the public interest would be served by a prompt grant of this STA.

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Yukon-Waltz Communications, Inc.

Response to Question 10 (Cont'd):

YWCI acknowledges that the grant of the STA will not prejudice any action the Commission may take on the underlying application seeking Commission consent to the transfer/assignment. YWCI further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing.

Response to Question 16:

In response to 47 C.F.R. §63.18(d), Applicant has not previously been granted international Section 214 authority. Applicant seeks authorization to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2) to resell the international services of authorized U.S. common carriers for the provision of international switched, private line, data, television and business services to all international points, and to resell private lines for the purpose of providing international basic switched services to countries found to offer equivalent resale opportunities. Accordingly, Sections 63.18(e)(3) and 63.18(g) are not applicable.