

**TWIN LAKES COMMUNICATIONS, INC.**

**Response to Question 10**

Twin Lakes Communications, Inc. ("Twin Lakes") respectfully seeks Special Temporary Authorization ("STA") for the provision of resold international services pending grant of its application for permanent Section 63.18(e)(2) authorization, filed simultaneously herewith. Twin Lakes has recently discovered that, during the course of corporate formation, pursuit of various operational authorizations and other required filing, the company apparently, and inadvertently, overlooked filing for international authorization. Accordingly, Twin Lakes hereby seeks special temporary authorization to provide international services. Prompt grant of the STA request would serve the public interest by allowing Twin Lakes to continue uninterrupted international service to its customers.

Twin Lakes only recently realized that the required application for international authorization was not submitted in a timely fashion. In the course of preparing an application as the proposed transferee of a target company's international authorization, a review of corporate files failed to produce a Section 214 International Authorization for Twin Lakes. It appears that, despite the fact that Twin Lakes regularly accounts for international revenues (through USAC reporting and regulatory fee filings), and regularly files timely annual international traffic reports, the pursuit of formal authorization was overlooked.

Promptly upon confirming this fact, Twin Lakes is seeking to correct this oversight by initiating the preparation of this application and its companion application for permanent authorization. Twin Lakes acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying application for permanent authorization, or the contemplated subsequent application seeking Commission consent to transfer of the authorization of the target company. Twin Lakes further acknowledges that this STA can be revoked by the Commission on its own motion without a hearing.

Good cause exists for grant of the instant request. Grant would ensure that Twin Lakes's customers would not suffer inconvenience or loss of service, or otherwise be affected adversely. Having become aware of its oversight, Twin Lakes is voluntarily attempting to take all steps necessary to rectify the situation as promptly as

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**Response to Question 10 (continued)**

possible. Accordingly, Twin Lakes submits that the public interest would be served by prompt grant of this request for STA.

**Response to Question 16**

Applicant Twin Lakes 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 US 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.