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BY ELECTRONIC POSTING

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

Re: Transtelco, Inc. – Request for Special Temporary Authority During Processing of Application for Transfer of Control of Section 214 Authorization (FCC File No. ITC-STA-20150112-00010)

Dear Ms. Dortch:

Transtelco, Inc. (“Transtelco”), by its attorneys and pursuant to Sections 1.65 and 63.21(a) of the Commission’s Rules, 47 C.F.R. §§ 1.65 & 63.21(a), hereby supplements the above-referenced request for Special Temporary Authority (“STA”) in response to a request for clarification from FCC staff. This letter seeks to clarify the STA Request in three respects detailed below.

First, the parties acknowledge that the grant of the requested STA would not prejudice any action that the Commission may ultimately take on the underlying application (FCC File No. ITC-T/C-20150112-00008). The parties further acknowledge that any such STA, if granted, could subsequently be modified or revoked by the Commission upon its own motion without prior hearing or notice.

Second, Transtelco clarifies that in addition to the other circumstances supporting grant of an STA, any outcome that would prevent Transtelco from operating under its previously granted authority would have potentially severe negative consequences for both the Transtelco and its customers. To the extent that continuation of the company’s current operations would be impaired by suspension of its authority to operate international carrier facilities, the consequent service interruptions would harm the several dozen U.S. and Mexican companies that rely on the vital trans-border communications links that the company provides. This, in turn, could have a significant



adverse impact on commerce in the border region, including the potential for job losses in both the United States and Mexico.

Finally, Transtelco respectfully requests that STA be granted for the maximum-permitted 180-day duration. *See* 47 C.F.R. § 63.25(a)(1). In view of the likelihood that it may take a matter of months for the Bureau to process the underlying application, an STA of such duration would serve the public interest by minimizing the need for additional extension requests that would be required if only a short-term 60-day STA were granted.

Please contact the undersigned counsel if you have any questions or require any additional information.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'David S. Keir', written over a large, stylized circular flourish.

David S. Keir
Counsel to Transtelco, Inc.