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July 20, 2015

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

Attn: Jodie May, Competition Policy Division
Wireline Competition Bureau

Re: **WC Docket No. _____ (To be assigned)**
Request for Domestic Section 214 Special Temporary Authority

Dear Ms. Dortch:

Simultaneously with this request, Sierra Telephone Company, Inc. (“STC”) and John H. Baker (“Transferee”) (STC and Transferee are jointly referred to as “Applicants”), by their undersigned counsel, and pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. §214, and Section 63.04 of the Commission’s rules, 47 C.F.R. §63.04, have filed an application for Section 214 authorization for the current ownership and control of STC and its affiliate Sierra Tel Long Distance (“STLD”) following a transfer of control by which John H. Baker became successor and sole trustee for each of the two trusts that hold a combined 98% of the voting stock of Sierra Tel Communications Group (“STCG”), the sole stockholder of STC and STCG. (the “214 Application”). By this letter the Applicants request Special Temporary Authorization (“STA”) as immediate authorization for STC to continue operations under the control of Transferee.

A. Background and Description of Transfer of Control

STC (FRN 0005753116) is a corporation organized under the laws of California. Its address is PO Box 219, 49150 Rd. 426, Oakhurst, CA 93644. STC is authorized by the California Public Utilities Commission to provide local exchange telephone service as the incumbent local exchange carrier (“ILEC”) in portions of Mariposa and Madera Counties, California. STC holds blanket domestic Section 214 authority to provide interstate interexchange telecommunications services.

John H. Baker is a United States citizen. His address is PO Box 219, 49150 Rd. 426, Oakhurst, CA 93644. His principal business is communications and he serves as Vice President of STC, STLD and STCG. John H. Baker also serves as the executor of the Estate of Harry H. Baker, Jr.

Until January 12, 2015, Harry H. Baker, Jr. was the controlling party of STC and STLD. Aware that he was seriously ill, and to assure that operations of STC and STLD continued in capable hands, he appointed his son, John H. Baker, as successor and sole trustee for each of the two trusts that hold a combined 98% of the voting stock of STCG and resigned as trustee of both trusts effective January 12, 2015. Neither Harry nor John Baker was aware at that time that prior authorization of the Commission was needed for what amounted to a transfer of control of STC and STLD.

Exhibit A lists the name, address and citizenship of each of the STCG's ten percent or greater direct and indirect shareholders or other equity holders. There are no interlocking directorates.

B. Public Interest Statement

By this letter, STA is requested to permit a continuation of interstate interexchange telecommunications services by STC while applications for authorization of the current control are under review by Commission staff. John H. Baker is familiar with operations of the operating companies, having served as an officer of STC since 1981, and STLD since 1998. Grant of the requested STA will serve the public interest, convenience and necessity because it will permit the continued provision of service by STC without interruption to customers while the Commission staff considers an application for the current control of STC.

Customers rely upon STC for telecommunications service and would be adversely impacted if there is a disruption of service while the companion application is processed.

The parties to this STA request acknowledge that grant of this request will not prejudice any action the Commission may take on the companion application for Commission authorization of the current ownership and control of STC. The parties to this STA request further acknowledge that STA may be revoked by the Commission upon its own motion without a hearing. Applicants acknowledge that grant of this STA request and the 214 Application will not preclude enforcement action for the unauthorized transfer of control.

Accordingly, favorable action on this STA request is consistent with public interest considerations. If any further information is needed please communicate with this office.

Respectfully submitted,



David L. Nace

cc: Jodie May (FCC, by email)
Tracey Wilson (FCC, by email)
Myrva Charles (FCC, by email)
Dennis Johnson (FCC, by email)

Exhibit A

SIERRA TEL COMMUNICATIONS GROUP

Shareholders

As of July 13, 2015

Stockholder Name & Address	% Common (Voting)	% Class A Preferred (Non-Voting)	% Class B Preferred (Non-Voting)
Harry H. Baker, Jr. 1975 Trust PO Box 219, 49150 Rd. 426 Oakhurst, CA 93644 Organized in California	49%	42.1%	
Sole Trustee:			
John H. Baker PO Box 219, 49150 Rd. 426 Oakhurst, CA 93644 U.S. Citizen			
Beneficiaries:			
John H. Baker PO Box 219, 49150 Rd. 426 Oakhurst, CA 93644 U.S. Citizen			
Marie Verna Baker David Baker Heidi Baker Heidi Baker, Trustee of the Matthew Baker Trust c/o STCG PO Box 219 49150 Rd. 426 Oakhurst, CA 93644 Each beneficiary, a U.S. citizen			49 %
Harry H. Baker Revocable Trust (2003) PO Box 219, 49150 Rd. 426 Oakhurst, CA 93644 Organized in California	49%	57.9%	

Stockholder Name & Address	% Common (Voting)	% Class A Preferred (Non-Voting)	% Class B Preferred (Non-Voting)
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Sole Trustee:

John H. Baker
 PO Box 219, 49150 Rd. 426
 Oakhurst, CA 93644
 U.S. Citizen

Beneficiaries:

John H. Baker
 PO Box 219, 49150 Rd. 426
 Oakhurst, CA 93644
 U.S. Citizen

Marie Verna Baker		49 %
David Baker		
Heidi Baker		
Heidi Baker, Trustee of the Matthew Baker Trust		
c/o STCG		
PO Box 219		
49150 Rd. 426		
Oakhurst, CA 93644		
Each beneficiary, a U.S. citizen		

John H. Baker Revocable Trust	2%	2%
PO Box 219, 49150 Rd. 426		
Oakhurst, CA 93644		
Organized in California		

Sole Trustee:

John H. Baker
 c/o STCG
 PO Box 219, 49150 Rd. 426
 Oakhurst, CA 93644
 U.S. Citizen

Stockholder Name & Address	% Common (Voting)	% Class A Preferred (Non-Voting)	% Class B Preferred (Non-Voting)
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Beneficiaries:

John H. Baker
c/o STCG
PO Box 219
49150 Rd. 426
Oakhurst, CA 93644
U.S. Citizen

Elizabeth Baker
c/o STCG
PO Box 219
49150 Rd. 426
Oakhurst, CA 93644
U.S. Citizen