



January 12, 2016

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: Request for International Section 214 Special Temporary Authority
Great Lakes Communication Corp.**

Dear Ms. Dortch:

Great Lakes Communication Corporation (“Great Lakes”), through counsel and pursuant to Section 214 of the Communications Act and Section 63.25 of the Federal Communications Commission’s (“FCC”) rules, respectfully requests such Special Temporary Authority (“STA”) as may be necessary to allow Great Lakes to continue providing any international telecommunications services its local exchange customers may solicit from it while the FCC reviews and acts upon its concurrently filed International Section 214 Application for permanent authority to provide such services.¹

Great Lakes is a competitive local exchange carrier that provides competitive telecommunications and broadband services in rural Northwest Iowa. It has successfully expanded its service offerings to include high-quality telecommunications and broadband services to historically underserved communities in its service territory. It recently discovered, however, that even though it had engaged a consultant to ensure compliance, and even though it had been reporting to the FCC its relatively minor amounts of resold international telecommunications services via its annual International Traffic and Revenue Reports, it had nevertheless neglected to first secure International 214 Authorization from the FCC to provide such services. It has now promptly sought FCC approval upon identifying this issue. Great Lakes at all times intended to comply with the Commission’s Section 214 rules. The delay in filing for Commission authorization was the result of administrative oversight.

Great Lakes respectfully submits that granting this STA is in the public interest because it allows the continued provision of uninterrupted service to its customers while the FCC reviews its pending application for permanent Section 214 international authority.

¹ Great Lakes does not seek an extension longer than the maximum 6-month period contemplated in 47 C.F.R. § 63.25(a)(1). As explained in Great Lakes’ concurrently filed International Section 214 Application, that application qualifies for streamlined processing.

Great Lakes takes its regulatory obligations seriously and is committed to engaging counsel and consultants as needed to ensure compliance with its regulatory obligations.

Great Lakes acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying application. Great Lakes further acknowledges that this STA can be modified or revoked by the Commission upon its own motion without a hearing.

Please do not hesitate to contact me if you have any questions or need additional information regarding this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Bowser". The signature is written in a cursive, flowing style.

Joseph P. Bowser

Counsel to Great Lakes Communication Corp.