

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of . )  
 )  
**City of Crosslake, Minnesota** )  
**Tri-Co Technologies, LLC** )  
 )  
For Authority to Continue Reselling International Toll Service Pending )  
Filing and Grant of an Application for Assignment of an International )  
Section 214 Authorization for Global Resale )  
  
TO: Chief, International Bureau

**APPLICATION FOR SPECIAL TEMPORARY AUTHORITY**

The City of Crosslake, Minnesota (“City”; FRN: 0003744687) and Tri-Co Technologies, LLC (“Tri-Co”; FRN: 0025682071) hereby request Special Temporary Authority to allow Tri-Co to continue reselling international toll termination services to customers in a single exchange serving the area in and around the City of Crosslake in Crow Wing County in rural central Minnesota while the City and Tri-Co file and obtain grant of an application for assignment of the International Section 214 Authorization for Global Resale (File No. ITC-214-20080814-00375) held by Crosslake Communications (“CLC”: FRN: 0019-0520-18) from the City to Tri-Co.

On June 28, 2016, the City and Tri-Co filed a Domestic Section 214 Application with the Wireline Competition Bureau for streamlined consent to the assignment of the interstate exchange access and interexchange toll service assets of CLC, including its blanket domestic Section 214 authorization, from the City to Tri-Co. That application

was accepted for filing and accorded streamlined treatment, Public Notice (*Domestic Section 214 Application Filed for the Acquisition of Assets of Crosslake Communications by Tri-Co Technologies, LLC*), WC Docket No. 16-208, DA 16-773, released July 6, 2016, and was subsequently granted effective August 6, 2016, Public Notice (*Notice of Section 214 Authorizations Granted*), WC Docket No. 16-208 and 16-213, DA 16-898, released August 8, 2016. The transaction was closed on August 31, 2016.

CLC was a small local exchange carrier operated by the City of Crosslake, Minnesota (2010 population: 2,141) that provided local exchange service, exchange access and resold toll services to approximately 1,470 access lines, many of which connected summer cottages and similar vacation and recreational structures. It was managed by an Enterprise Fund of the City.

In August, 2008, CLC applied for and obtained an International Section 214 Authorization for Global Resale (File No. ITC-214-20080814-00375, granted August 29, 2008). During recent years, CLC's international toll resale business and operations have been very limited, with its international toll resale revenues fluctuating from approximately \$400 in 2014 up to approximately \$625 in 2015 and then down below \$150 for the first three quarters of 2016.

For reasons not wholly clear to the parties, CLC's eight-year-old International Section 214 Authorization was overlooked during the period that the sale of CLC's assets to Tri-Co was being negotiated and agreed upon, and the requisite Domestic Section 214

and Minnesota Public Utilities Commission applications were being filed and granted. The City employees operating CLC had limited experience with Commission regulation and do not appear to have remembered the International Section 214 Authorization or to have realized that it required a separate Commission application and grant. By 2016, CLC's international toll resale operations and revenues had become so limited that the City employees did not call attention to them during negotiations, nor did Tri-Co's representatives appear to notice or focus upon them. At the same time, Tri-Co's representatives and attorney do not appear to have asked questions that might have jogged memories or otherwise uncovered the existence of the International Section 214 Authorization.

Hence, whether CLC's 2008 International Section 214 Authorization was forgotten or overlooked, no application for the assignment of it by the City to Tri-Co was filed in conjunction with the Domestic Section 214 Application, or at any other time prior to the closing of the CLC sale. Rather, the existence of CLC's International Section 214 Authorization recently was brought to Tri-Co's attention by a consultant.

Tri-Co and the City have investigated the matter and their options. Whereas the Crosslake area international toll resale business is very small and appears to be declining, Tri-Co nonetheless recognizes an obligation to continue to offer the service to its Crosslake area customers. Therefore, rather than having the City cancel its 2008 authorization, the parties have agreed to file the present Application for Special Temporary Authority to continue the service, while they are filing and prosecuting an

application for assignment of CLC's International Section 214 Authorization from the City to Tri-Co.

Respectfully submitted,

**CITY OF CROSSLAKE, MINNESOTA**

**TRI-CO TECHNOLOGIES, LLC**

By: Stephen L. Roe

By: Josh Netland

Printed Name: Stephen L. Roe

Printed Name: Josh Netland

Title: Mayor

Title: General Manager

Date: 12.13.2016

Date: 12-13-16

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