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March 27, 2017

Via Electronic Filing

LEON L. NOWALSKY

EDWARD P. GOTHARD

Marlene H. Dortch, Secretary Federal Communications Commission International Bureau 445 12<sup>th</sup> Street SW Washington, DC 20554

RE: Request for Special Temporary Authority

on behalf of Benchmark Communications, LLC ("Benchmark")

Dear Secretary Dortch:

Please allow this letter to serve as a supplement to the Request for Special Temporary Authority filed on behalf of Benchmark Communications, LLC ("Benchmark") on March 16, 2017, pursuant to Staff request.

- 1. A Grant of Special Temporary Authority Will Serve the Public Interest. This STA has been filed at the direction of the Commission staff to accompany the filing of the Transfer of Control of a portion of the Membership Interests in Benchmark from Hunt Telecommunications, LLC to Crescent Affiliates, Inc. Grant of the STA is needed to allow Benchmark to continue to operate its telecommunications network pending Commission action on the Section 214 Transfer Application. Benchmark's International Section 214 license authorizes Benchmark to provide international resale service. Benchmark is an active domestic carrier, presently providing telephone, cable and Internet services to multi-dwelling units in the states of Louisiana, Mississippi, Alabama and Florida. As such, the public interest will be served by granting this STA request to allow uninterrupted provision of Benchmark's services to its customers. In further support of this request, the Applicants respectfully request that the Commission consider that Benchmark has acted in good faith to rectify its failure to file for approval of the transfer of control described herein, admitting its failure to comply with Commission rules, and seeking approval of the Application.
- 2. <u>Circumstances Regarding Need for STA.</u> The circumstances leading to the need for an STA are as follows: Hunt Telecommunications, LLC ("Hunt"), the sole member of Benchmark Communications, LLC ("Benchmark") entered into an Agreement in January, 2014 to sell fifty percent (50%) of the Membership Interests in Benchmark to Crescent Affiliates, Inc. ("Crescent"). Hunt, nor Benchmark, sought Commission approval for the transaction and this error was discovered during a recent review of Benchmark's regulatory status. Benchmark wishes to make full disclosure of all substantive and non-substantive changes which have occurred involving this transaction.
- Steps Taken to Ensure Future Compliance with FCC Rules. Benchmark has taken steps to
  ensure future compliance with Commission rules. Benchmark will consult with Communications counsel

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on a regular basis as necessary to remain advised and up-to-date on Commission regulatory requirements affecting its operations. In addition, Benchmark will maintain a current copy of Part 63 of the Commission's rules at its headquarters in Metairie, Louisiana, and has engaged Compliance Solutions, Inc. to oversee compliance.

- 4. <u>Requested Duration for Special Temporary Authority</u>. Benchmark requests 60 days temporary authority while the Section 214 Transfer of Control Application is pending. All of the ownership interests in Benchmark are held by United States citizens.
- 5. <u>Acknowledgment</u>. Benchmark hereby acknowledge that the grant of this STA will not prejudice any action the Commission may take on the underlying application seeking Commission approval of the Section 214 transfer of control application. The parties further acknowledge that this STA can be revoked by the Commission upon its own motion without a hearing.

Should you have any questions, please feel free to contact me.

Sincerely,

Len Novabky
Leon Nowalsky / W

LLN/rph