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July 20, 2004

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: Oregon Farmers Mutual Telephone Company and  
Northwest Missouri Holdings, Inc., et al.  
Application for Transfer of Control

Dear Ms. Dortch:

In response to requests from the Commission's staff, Applicants Oregon Farmers Mutual Telephone Company and Northwest Missouri Holdings, Inc., provide the following additional information with respect to their Domestic and International Applications for Transfer of Control:

**Section 63.04(a)(4) Ownership**

As stated in the application, Northwest Missouri Holdings, Inc. will, upon closing of the transaction, be owned 49% by American Broadband Communications, Inc., and 51% by Signal Equity Partners II, L.P.<sup>1</sup> Further information regarding these entities is as follows:

American Broadband Communications, Inc.                      10% Owners:

William Tucker 52%  
Citizenship: US  
Residence: Maryland  
No other communications holdings

Patrick Eudy 35%  
Citizenship: US  
Residence: North Carolina

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<sup>1</sup> The application identified the 51% owner as Signal Equity Partners, the complete identification is as stated above.

60% Owner of Dialog Telecommunications, a Competitive Local Exchange Carrier operating in Kentucky, Mississippi and North Carolina

American Broadband Communications, Inc. has a 40% interest in American Georgetown, Inc., which, in turn, owns 100% of Georgetown Telephone Company, an Incumbent Local Exchange Carrier in Mississippi. Signal Equity Partners, II, L.P. owns the remaining 60% of American Georgetown.

Signal Equity Partners II, L.P.

General Partner            Signal Equity Advisors II, LLC, (2.94%)

Signal Equity Advisors II, LLC            10% Owners

Timothy P. Bradley    23.3%  
Brooklyn, N.Y.  
Citizenship, U.S.

Alfred J. Puchala, Jr.    22.3%  
Westport, CT  
Citizenship, U.S.

Christian Nolen            19.6%  
Watertown, MA  
Citizenship, U.S.

Malcolm C. Nolen        19.6%  
New York, NY  
Citizenship, U.S.

Charles T. Lake II        11.2%  
New York, NY  
Citizenship, U.S.

10% Limited Partners

Garden House, LLC    58.9%  
New York, NY

Garden House, LLC    10% Owner

Eliot Nolen, New York, NY, U.S. citizen, owns approximately 95% of Garden House and does not own or control other communications businesses.

Eurazeo            23.5%  
Paris, France

Eurazeo indirectly owns 15.2% of Eutelsat that it holds through a 66%

interest in BlueBirds, which has a 23% interest in Eutelsat.<sup>2</sup> Eutelsat provides communications services in Europe and the Indian Ocean region. Eurazeo also owns a 11% interest in Distacom, which owns companies providing mobile telephone service in Hong Kong and India

Burden Direct Investment Fund III 11.76%  
New York, NY

Does not own or control other communications businesses

### **Section 63.03 Request for Streamlined Processing**

The application is entitled to a presumption of applicability of the streamlined procedures pursuant to Sections 63.03(b)(2)(ii) and (iii). At the close of the transaction, Northwest Missouri Holdings, Inc., together with all of its affiliates, will have a less than 10% share of the interstate, interexchange market. With respect to Section 63.03(b)(2)(ii), Dialog Telecommunications, a non-dominant carrier provides services exclusively outside the geographic area where the dominant carrier, Oregon Farmers Mutual Telephone Company is dominant. With respect to Section 63.03(b)(2)(ii), the applicant Oregon Farmers Mutual Telephone Company and Northwest Missouri Holdings, Inc.'s affiliate Georgetown Telephone Company together have fewer than two (2) percent of the nation's subscriber lines and there are no overlapping or adjacent service areas.

### **Section 63.12 Request for Streamlined Processing**

The application is entitled to streamlined processing under Section 63.12(c) because neither applicant Northwest Missouri Holdings, Inc. nor applicant Oregon Farmers Mutual Telephone Company is affiliated with a foreign carrier. Oregon Farmers Mutual Telephone Company has no relationship whatever with a foreign carrier. Although there will indirect ownership relationships between Northwest Missouri Holdings, Inc. and Eutelsat and with the mobile carriers owned by Distacom, these relationships do not amount to affiliation as defined in Section 63.09(e) and neither Eutelsat nor Distacom owns facilities in Missouri.

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<sup>2</sup>

*See*, [http://www.eurazeo.com/gb/investissement/investissements\\_type.htm](http://www.eurazeo.com/gb/investissement/investissements_type.htm)

Respectfully submitted

Northwest Missouri Holdings, Inc.  
Oregon Farmers Mutual Telephone Company, et al.  
Oregon Farmers Mutual Long Distance, Inc.  
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By

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