

combine its financial, technical and market resources and expertise with that of OCI, thereby enhancing its ability to provide reliable, competitively priced services to customers in Montana. The Transaction will facilitate the entrance of Eschelon into the markets presently served by OCI. Accordingly, the transfer of control of OCI to ETI will increase, not degrade, the competitiveness of the markets served by the Applicants.

Consummation of the proposed Transaction will allow ETI to make its technical, product development, and service resources available to help support and service OCI customers. ETI is committed to exceeding customer expectations and understands that service and support are just as important as having the latest technology at competitive prices. That is why ETI supports its products and services with dedicated and skilled account teams. OCI customers can expect the same dedicated attention upon consummation of the proposed Transaction.

The transfer of control of OCI to ETI does not result in any anticompetitive effects. OCI and ETI do not presently provide services in the same markets and the combined interstate, interexchange market share post-closing will not exceed 10 percent in any market. In all instances where OCI and ETI provide local exchange services, the incumbent local exchange carrier has a virtual monopoly and this Transaction will not diminish the ILEC's dominant market position. Furthermore, in all instances where OCI and ETI provide telecommunications services other competitive carriers participants in these markets. For each of the foregoing reasons, grant of the proposed transaction is in the public interest.

Joann Ekblad

From: Wagner, Kim K. [kkwagner@eschelon.com]
Sent: Thursday, August 17, 2006 6:06 PM
To: Joann Ekblad
Cc: Murray, Catherine A.
Subject: Eschelon/OneEighty Section 214 Additional Information

Ms. Ekblad,

Attached is a PDF copy of Eschelon's Domestic 214 Application containing the ownership information you requested. Please see pages 10 and 11.

<<FCC 214 Domestic.Application.filing.final.08.09.06.pdf>>

Sent on behalf of Cathy Murray (612-436-1632)

Kim K. Wagner

Senior Legal Secretary

Eschelon Telecom, Inc.

612.436.6225 (direct)

612.436.6816 (department fax)

kkwagner@eschelon.com

8/18/2006

August 18, 2006

Via Overnight Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
International Bureau
445 - 12th Street S.W.
Washington, D.C. 20554



RECEIVED

Re: In the Matter of **OneEightyCommunications, Inc.**, Transferor, and **Eschelon Telecom, Inc.**, Transferee, Joint Application for Consent to a Transfer Pursuant to Section 214 of the Communications Act of 1934, as Amended
International Docket No. **ITC-T/C-20060810-00386**
AUG 23 2006
Policy Division
International Bureau

Dear Ms. Dortch:

Per Staff request, Eschelon Telecom, Inc. (ETI) and OneEighty Communications, Inc. (OCI) (together, Applicants) hereby supplement and clarify the above-referenced Application with the following requested information.

In the Applicants' response to Question 10(d), contained in Attachment 1, Applicants stated that "OCI received its international authorization to provide resale services on June 30, 2004, in File No. ITC-214-20040426-00243." That statement should read "OCI received its Section 214 international authorization from the Commission in File No. ITC-214-20011210-00626, as assigned in File No. ITC-ASG-20040426-00243."

In all other respects the Application remains as filed.

Please do not hesitate to contact me should there be any questions about the information provided in the Application or this Supplement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis D. Ahlers".

Dennis D. Ahlers
Assistant Secretary, Associate General Counsel
Eschelon Telecom, Inc.
612.436.6249 (direct)
612.436.6349 (fax)
ddahlers@eschelon.com

cc: Sumita Mukhoty, FCC International Bureau (email and U.S. Mail)
Christopher Dimock, OneEighty (U.S. Mail)