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November 1, 2006

FILED/ACCEPTED

NOV - 1 2006

Federal Communications Commission
Office of the Secretary

VIA COURIER

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

RE: Application of Citizens Communications Company and Commonwealth Telephone Enterprises, Inc., For Section 214 Authority to Transfer Control of Domestic and International Authorization, File No. ITC-T/C-20060929-00450; WC Dkt. No. 06-184

Dear Ms. Dortch:

Attached for filing on behalf of RCN Corporation ("RCN") is a request that the International Bureau remove the above-referenced application in File No. ITC-T/C-20060929-00450 from streamlined treatment.

An original and nine (9) copies of this letter are enclosed. Please date-stamp and return the enclosed extra copy of the filing in the attached envelope. Questions regarding this filing may be addressed to the undersigned.

Respectfully submitted,

Michael W. Fleming
Brian McDermott

Counsel for RCN Corporation

A Professional Corporation

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

In re: Application of)	
)	
Citizens Communications Company)	
)	
and)	File No. ITC-T/C-20060929-00450
)	WC Dkt. No. 06-184
Commonwealth Telephone Enterprises, Inc.)	
)	
For Section 214 Authority to Transfer)	
Control of Domestic and International)	
Authorization)	

**REQUEST TO REMOVE APPLICATION
FROM STREAMLINED PROCESSING**

RCN Corporation (“RCN”), by and through undersigned counsel, and pursuant to the Commission’s Public Notice of October 27, 2006, Report No. TEL-01082S, hereby requests the Commission to remove the above-captioned Application (“Application”) from streamlined processing to allow the International Bureau (“Bureau”) processing timeframe to comport with the ongoing Wireline Competition Bureau (“WCB”) review. Specifically, RCN believes that material issues of fact, law and policy exist that require the Bureau to apply close scrutiny to the proposed transaction. Because such scrutiny cannot be reasonably accomplished during the limited window for consideration of the Application, RCN respectfully submits that the Bureau should remove the Application from streamlined processing. Non-streamlined proceeding would also allow the Commission’s approval processes to move in lock-step and ensure continuity between the Bureau and the WCB.

By way of background, on October 27, 2006, the Bureau issued its Public Notice in the above-referenced File, accepting the Application of Citizens Communications Company and Commonwealth Telephone Enterprises, Inc. ("Applicants") for filing and finding that upon initial review that the application was subject to streamlined processing pursuant to Section 63.12 of the Commission's rules. As made clear in the Public Notice and the Commission's Rules, however, the Bureau has discretion to subsequently remove the Application from streamlined treatment.

On October 27, 2006, the Wireline Competition Bureau ("WCB") also issued a Public Notice of the Application and assigned it WC Docket No. 06-184. In that Public Notice, although Applicants specifically requested streamlined treatment from both Bureaus, the WCB denied Applicants' request for streamlined treatment.

RCN believes that the transaction described in the proposed transactions raise serious and significant public interest concerns and that interested parties, including RCN, intend to file substantive comments related to the proposed transaction, the potential implications of the proposed transactions, and the conditions and restrictions that are needed to protect the public interest. RCN expects, at a minimum, to file its comments no later than November 10, 2006, the date upon which WCB has required the submission of comments -- and the date that the Bureau's approval would become effective if the Application is not removed from streamlined processing.

Accordingly, in the event that the Application is not removed from streamlined treatment, RCN submits that the Bureau will have insufficient time to review the comments of RCN and other interested parties. Furthermore, in the event that the Bureau were to permit the Application

to be granted, it could potentially find itself in the awkward position of having approved an application that is contested before a separate bureau of the Commission.

In light of these issues, RCN urges the Bureau to remove the above-captioned Application from streamlined processing. Such removal is critical and necessary to ensure that a full opportunity to review the transaction proposed therein can be completed, as well as to allow the Bureau's ultimate consideration of the issues to be completed in coordination and on a similar timetable with the WCB's review.

Respectfully submitted,



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(703) 748-0244 (fax)

Dated: November 1, 2006

Counsel for RCN Corporation

Certificate of Service

The following were served a copy of the attached Request via first class mail and electronic mail:

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Counsel for Commonwealth Telephone Enterprises, Inc.

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The following were served a copy of the attached Request via electronic mail:

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