

MILLER CANFIELD

MICHAEL C. RAMPE
TEL (517) 483-4941
FAX (517) 374-6304
E-MAIL rampe@millercanfield.com

Miller, Canfield, Paddock and Stone, P.L.C.
One Michigan Avenue, Suite 900
Lansing, Michigan 48933
TEL (517) 487-2070
FAX (517) 374-6304
www.millercanfield.com

MICHIGAN: Ann Arbor
Detroit • Grand Rapids
Kalamazoo • Lansing
Saginaw • Troy

FLORIDA: Tampa

ILLINOIS: Chicago

NEW YORK: New York

OHIO: Cincinnati

CANADA: Toronto • Windsor

CHINA: Shanghai

MEXICO: Monterrey

POLAND: Gdynia
Warsaw • Wrocław

October 6, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission

VIA ECFS and IBFS

Re: Withdrawal of Request for Nunc Pro Tunc Treatment of applications filed in WC 15-224, IBFS ITC-T/C-20150922-00226, and IBFS ITC-T/C-20150922-00227.

Dear Ms. Dortch:

I am writing regarding the following related filings:

- i. WC 15-224:** Joint Application requesting approval of domestic Section 214 authorization for the transfer of control of Great Lakes Comnet, Inc., Clinton County Telephone Company, Westphalia Telephone Company, Westphalia Broadband, Inc., and Comlink, LLC, to Ace Telephone Association and Ace Telephone Company of Michigan, Inc., which was uploaded to ECFS on September 16, 2015, and which included a request for Special Temporary Authority (“STA”).
- ii. IBFS Filing ITC-T/C-20150922-00226:** Joint Application requesting approval for the transfer of control of Great Lakes Comnet, Inc.’s international Section 214 authorization for global resale service to Ace Telephone Company of Michigan and Ace Telephone Association, which was uploaded to IBFS on September 22, 2015 (an STA request for which was filed on October 5, 2015).
- iii. IBFS Filing ITC-T/C-20150922-00227:** Joint Application requesting approval for the transfer of control of Westphalia Broadband, Inc.’s international Section 214 authorization for global resale service to Ace Telephone Company of Michigan and Ace Telephone Association, which was uploaded to IBFS on September 22, 2015 (an STA request for which was filed on October 5, 2015).

The above-referenced filings requested “nunc pro tunc” approval of the transfers of control. The applicants understand that the FCC does not grant such filings on a “nunc pro tunc” basis, and therefore the applicants hereby withdraw the request for nunc pro tunc treatment of these filings. In lieu of such treatment, the applicants have applied for STA to continue to provide service to customers during the pendency of the applications in the above-referenced

October 6, 2015

cases. Other than withdrawing the request for nunc pro tunc treatment, the applicants request approval of their filings in all other respects.

If you have any questions in respect to this filing, please contact me directly. Thank you for your assistance in this matter.

Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By: _____
Michael C. Rampe

MCR/cla

cc via e-mail: Dennis Johnson
Jodie May
Sumita Mukhoty
Gabrielle Kim