

February 8, 2017

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Joint Section 214 Application for Transfer of Control of EarthLink Wholly-Owned Subsidiaries to Windstream Holdings, Inc.*, WC Docket No. 16-393; FCC File Nos. ITC-T/C-20161117-00328, ITC-T/C-20161117-00329, ITC-T/C-20161117-00330, and ITC-T/C-20161117-00331

Dear Ms. Dortch:

On January 19, 2017, the Wireline Competition and International Bureaus approved the transfer of control of section 214 authorizations held by EarthLink Holdings Corp. to Windstream Holdings, Inc. (“Windstream”).¹ Consistent with the requirements of 47 C.F.R. § 1.65, Windstream provides the following update.

Per January disclosure filings, BlackRock, Inc. (together with its subsidiaries, “BlackRock”) now holds approximately 10.2 percent of Windstream common stock and 9.2 percent of EarthLink common stock.² If at the time of closing BlackRock’s holdings are at those levels, after consummation of the transactions BlackRock would hold approximately 9.7 percent of the combined company. BlackRock is a publicly-traded Delaware-incorporated investment management firm with one apparent 10 percent-or-greater shareholder, The PNC Financial Services Group, Inc.³

¹ *Domestic and International Section 214 Applications Granted for the Transfer of Control of EarthLink Holdings Corp. to Windstream Holdings, Inc.*, Public Notice, DA 17-92, WC Docket No. 16-393 (rel. Wireline Comp. & Int’l Burs. Jan. 19, 2017).

² BlackRock, Inc., Statement of Acquisition of Beneficial Ownership by Individuals (Form SC 13G/A) (Jan. 9, 2017) (noting BlackRock’s holdings in Windstream Holdings, Inc. as of Dec. 31, 2016); BlackRock, Inc., Statement of Acquisition of Beneficial Ownership by Individuals (Form SC 13G/A) (Jan. 24, 2017) (noting BlackRock’s holdings in EarthLink Holdings Corp. as of Dec. 31, 2016).

³ BlackRock, Inc., Registration Statement Under the Securities Act of 1933 [Amend] (Form S-3/A) (Feb. 1, 2017) (noting that as of September 30, 2016, The PNC Financial Services

As a result of this change, Windstream has identified the following additional companies that may be carrier affiliates by examining BlackRock's SEC Forms 13F for the third quarter of 2016, the FCC's 499 Filer database, and publicly available online information:⁴

- Black Box Corp. (in which BlackRock holds approximately 11.05 percent), which provides business IT services inside and outside the United States;
- CalAmp Corp. (in which BlackRock holds approximately 10.50 percent), which provides telematics and other solutions in broad geographic areas;
- Comtech Telecommunications Corp. (in which BlackRock holds approximately 10.13 percent), which provides business services inside and outside the United States;
- General Communication, Inc. (in which BlackRock holds approximately 12.68 percent), which provides residential and business services throughout Alaska;
- Inteliquent, Inc. (in which BlackRock holds approximately 11.74 percent), which provides voice and data services throughout the United States;
- Iridium Communications Inc. (in which BlackRock holds approximately 12.22 percent), which provides satellite-based services globally; and
- Telephone and Data Systems, Inc. (in which BlackRock holds approximately 15.68 percent), which provides wireless, broadband, and voice services in many areas of the United States.

Please contact me if you have any questions.

Sincerely,



Julie A. Veach
Counsel to Windstream Holdings, Inc.

Group, Inc. "held 21.3% of BlackRock's voting common stock and 22.0% of BlackRock's capital stock, which includes outstanding common and nonvoting preferred stock").

⁴ The applicants previously disclosed possible affiliates created by the holdings of The Vanguard Group, Inc. Five of those companies are also possible affiliates due to holdings of BlackRock: Cincinnati Bell Inc.; Consolidated Communications Holdings, Inc.; CSG Systems International, Inc.; Lumos Networks Corp.; and Spok Holdings, Inc.