

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Applications for Consent to the Transfer	)	ITC-T/C-20180925-00178
of Control of Spectrotel, Inc. and Waiver	)	
Request Pursuant to Section 214 of the	)	WC Docket No. 18-292
Communications Act of 1934, as	)	
Amended	)	
	)	
	)	
	)	

**AMENDMENT TO  
JOINT DOMESTIC AND INTERNATIONAL SECTION 214 APPLICATION  
AND REQUEST FOR WAIVERS**

Spectrotel, Inc. (“Spectrotel”) hereby amends its request for authority for the transfer of control of Spectrotel in bankruptcy, which became effective on November 25, 2002. Spectrotel removes its request for authority to be granted *nunc pro tunc*, but maintains its request for consent for the reorganization transaction with a request for waivers needed to allow the filing of the Joint Application outside of the required timeframe for that application. Contemporaneously with this amendment, Spectrotel is filing a request for special temporary authority (“STA”) to bring the company into compliance while the application for authority remains pending.

In addition, Spectrotel supplements its application to provide additional information to clarify Jacob Dayan’s interests in Spectrotel. As indicated in the original application, Mr. Dayan wholly owns and controls Spectrotel and serves as its Chief Executive Officer. Spectrotel owns 85 percent of Spectrotel Holding Company LLC, which in turn has the following wholly owned subsidiaries, which are the entities certificated to provide service in the states indicated:

<b>Subsidiary Name</b>	<b>States Certificated</b>
Spectrotel of New York LLC	New York
Spectrotel of Virginia LLC	Virginia
Spectrotel of New Jersey LLC	New Jersey
Spectrotel of Pennsylvania LLC	Pennsylvania
Spectrotel of Maryland LLC	Maryland
Spectrotel of Alabama LLC	Alabama
Spectrotel of New England LLC	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont

A limited partnership entity, created to hold trusts created for the benefit of Mr. Dayan and his children, holds another 10 percent of Spectrotel Holding Company LLC. Mr. Dayan controls the general partner of that limited partnership. Mr. Dayan does not hold any other interests in telecommunications providers.

Prior to the reorganization in bankruptcy, Mr. Dayan held a 15.7 percent interest in Spectrotel and served as a member of Spectrotel's board. Immediately prior to entering into bankruptcy, Mr. Dayan assumed the role of Spectrotel's Chief Executive Officer, and continued in that role through the bankruptcy proceeding and after emergence from bankruptcy.

Commonwealth Associates Management Company, Inc. owned 11.9 percent of Spectrotel prior to the reorganization transaction. There were no foreign persons or entities that directly or indirectly owned or controlled 10 percent or more of Commonwealth Associates.

Respectfully submitted,

**SPECTROTEL, INC.**

/s/

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October 12, 2018