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May 22, 2020

VIA ECFS and IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**Re: CLARIFICATION TO SUPPLEMENT
WC Docket No. 20-78, File No. ITC-T/C-20200310-00040**

Dear Ms. Dortch:

PrimeLink, Inc. ("PrimeLink"), by counsel, hereby clarifies a previously filed redacted supplement in the above-referenced transfer of control proceedings submitted by the parties to the applications noted above on March 23, 2020 (the "*March Joint Supplement*"). Specifically, PrimeLink clarifies that it has nearly 400 fiber route miles in New York, comprised of owned and leased (including IRUs) facilities, including the approximately 150 owned route miles noted on page one of the *March Joint Supplement*.¹ The potential need for this clarification was recently identified as part of the process PrimeLink undertook to respond to the Department of Justice ("USDOJ") questions submitted to the US DOJ on April 28, 2020 in connection with USDOJ's review of national security, law enforcement, and public safety issues.

¹ After further review of PrimeLink's owned fiber, PrimeLink estimates its owned route miles to be approximately 182.

Marlene H. Dortch
Secretary
Federal Communications Commission
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Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Thomas J. Moorman".

Thomas J. Moorman
Counsel to PrimeLink, Inc

Attachment

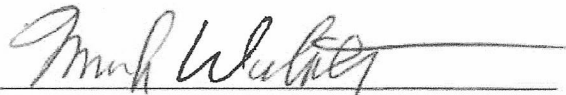
cc: D. Johnson, FCC (via email)
M. Charles, FCC (via email)
S. Mukhoty, FCC (via email)
D. Krech, FCC (via email)
J. Bird, FCC (via email)
C. Clements, Department of Justice (via email)
B. Ferencak, Morgan, Lewis & Bockius LLP (via email)

DECLARATION

I, Mark T. Webster, hereby declare that I am Secretary and Controller of PrimeLink, Inc. (the "Company"); that I read the forgoing Clarification to Supplement; and that the contents of the Clarification to Supplement with respect to the Company is true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of May, 2020.

A handwritten signature in cursive script, appearing to read "Mark Webster", is written over a horizontal line.

Mark T. Webster
Secretary and Controller
PrimeLink, Inc.