

**WINDSTREAM SERVICES II, LLC**

4001 N. Rodney Parham Road  
Little Rock, Arkansas 72212

Nicole Winters  
*Counsel II*

501.748.6313  
Email: [Nicole.Winters@windstream.com](mailto:Nicole.Winters@windstream.com)



March 9, 2021

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: Revised Supplemental filing to PAETEC iTEL, L.L.C.'s Application for  
Interconnected VoIP Numbering Authorization  
WC 20-416**

Dear Ms. Dortch:

PAETEC iTEL, L.L.C. (“Windstream IPES”) submits this revised supplemental information in connection with its above referenced Application filed on September 30, 2020.

1. Windstream IPES intends to provide interconnected VoIP service in the following states: Florida, Georgia, Indiana, North Carolina, South Carolina, Washington, and Wisconsin.
2. In compliance with Commission Rule Section 52.15(g)(2), in order to show its facilities readiness, Windstream IPES has supplied confidential exhibits to the Commission reflecting network agreements that are in place.
3. Windstream IPES’ ultimate parent company Windstream Holdings II, LLC (“Holdings II”) holds its interest in Windstream IPES through a vertical chain of several wholly-owned subsidiary companies that are U.S. domestic entities. On August 28, 2020, the FCC approved the transfer of control of Holdings II, which was simultaneously converted from a corporation to a limited liability company, in connection with its emergence from Chapter 11 bankruptcy protection. See DA 20-985, WC Docket No. 20-151 et al. (“Emergence Order”). The Emergence Order permitted the transfer of control to occur in two steps. At the end of Step One, which occurred on September 21, 2020, Holdings II’s equity ownership by non-U.S. holders is approximately 3.64%. The Emergence Order permitted Holdings II and two of its direct investors to issue Special Warrants to foreign investors. Pursuant to the Emergence Order, Holdings II was also required to file within 30 days of

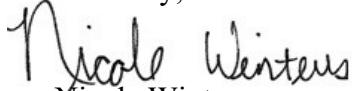
**March 9, 2021**

**Page 2 of 2**

emergence a Petition for Declaratory Ruling requesting a waiver to exceed the 25% statutory foreign ownership benchmark, to secure specific approval for a number of foreign entities to hold direct or indirect equity and voting interests in Holdings II, and to have up to 100% aggregate non-U.S. ownership. Holdings II filed the required Petition for Declaratory Ruling on October 21, 2020, in IBFS File No. ISP-PDR-20201021-00010, and this matter is currently pending. Step Two, the exercise of the Special Warrants, will not be consummated until the Commission has granted the requested Declaratory Ruling.

Should you have any questions or need additional information please feel free to contact me.

Sincerely,



Nicole Winters  
Counsel II