

VIA ELECTRONIC FILING

August 1, 2019

Patty VanGerpen Executive Director Public Service Commission of South Dakota 500 East Capitol Avenue Pierre, SD 57501-5070

RE: Mitel Cloud Services, Inc. – Request to Cancel Certificates of Authority and Withdraw Tariffs

Dear Ms. VanGerpen,

Mitel Cloud Services, Inc. (f/k/a Mitel NetSolutions, Inc., "Mitel" or "the Company"), through undersigned counsel, hereby requests that the Public Service Commission of South Dakota cancel its Certificates of Authority ("COAs") - to provide local exchange services in Docket No. TC08-130 on 1/9/2009 and interexchange services, in Docket No. TC02-120 on 3/7/2003 - and withdraw any applicable tariffs, effective as soon as possible.

Mitel's business model has continued to evolve and develop since the COAs were originally granted. Today, the Company serves its customers through VoIP and a variety of nomadic interconnected services as well as private business communication and collaboration solutions. Therefore, the COAs granted by the Commission are no longer necessary. Mitel will, however, continue to offer and provide VoIP and wireless services to customers throughout South Dakota in the future.

The public convenience and necessity will not be adversely affected by the action described herein. Mitel asserts that there are no customers whose service would be impacted by this cancellation. No customer is currently receiving regulated telecommunications services from the Company, and therefore, no customer will have service interruptions or disconnections. Mitel no longer provides regulated telecommunications services and has not offered such services for several years.

All services offered by the Company are sold on a non-tariffed basis pursuant to individually negotiated commercial agreements with sophisticated business customers. Mitel does not serve any residential or mass market consumers.

To the best of its knowledge, the Company is current on all reporting and fee remittance obligations.

Wherefore, Mitel hereby requests cancellation or withdrawal of its South Dakota COAs and tariffs as soon as the Commission can take appropriate administrative action.

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Any questions you may have regarding this filing should be directed to my attention at (703) 714-1313 or by email to <u>jsm@commlawgroup.com</u>. Thank you for your assistance in this matter.

Respectfully submitted,

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Jonathan S. Marashlian

