

ALAN GREGORY POOLE JR.  
404.885.3754 telephone  
404.885.3900 facsimile  
alan.poole@troutmansanders.com

# TROUTMAN SANDERS

TROUTMAN SANDERS LLP  
Attorneys at Law  
Bank of America Plaza  
600 Peachtree Street NE, Suite 5200  
Atlanta, Georgia 30308-2216  
404.885.3000 telephone  
troutmansanders.com

December 3, 2014

Utah Public Service Commission  
Attn: Gary Widerburg, Commission Secretary  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, UT 84114

**Re: Joint Application for Approval of Transfer of Ultimate Control of LSSi Data Corporation to NewNet Communication Technologies, LLC**

Dear Mr. Widerburg:

Enclosed for filing is a Joint Application for approval of transfer of ultimate control of LSSi Data Corporation to NewNet Communication Technologies, LLC.

Pursuant to Utah Admin Code R746-100-6, Mitchel H. Perkiel, an attorney at Troutman Sanders admitted to practice law in the State of Utah, appears on this filing along with me. In the event that further action is required, I also request that this Commission waive the requirement for local sponsoring counsel in this matter, which is in keeping with the Commission's practice with regards to "certain CLEC merger and acquisition transactions."<sup>1</sup>

Any questions you may have regarding this filing can be directed to my attention at 404-885-3754 or via email to alan.poole@troutmansanders.com. Thank you for your assistance in this matter.

Sincerely,

Alan Gregory Poole Jr.

---

<sup>1</sup>See Notice to Attorneys Licensed in a Foreign State, UTAH PUBLIC SERVICE COMMISSION, available at <http://www.psc.state.ut.us/faq/Pro%20Hac%20Vice%20Notice%20to%20Attorneys%20licensed%20in%20foreign%20state.pdf> (last visited 6:11 P.M., Nov. 24, 2014).