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**VIA OVERNIGHT DELIVERY**

Commission Secretary  
District of Columbia Public Service Commission  
1325 G Street NW, Suite 800  
Washington, DC 20005

Re: Mitel Cloud Services, Inc. Supplemental Response  
Docket No. TA06-5-23

To Whom It May Concern,

Mitel Networks Corporation ("Mitel Networks Corp."), Mitel US Holdings, Inc. ("Mitel US"), Mitel (Delaware), Inc. ("Mitel DE"), Mitel Networks, Inc., formerly ShoreTel, Inc. ("MNI") and Mitel Cloud Services, Inc. ("Mitel Cloud") (collectively, the "Parties") hereby supplements its filing of the transfer of control of Mitel Cloud from Mitel DE to MNI, pursuant to staff request dated June 7, 2018 ("Supplemental Request").

In the Supplemental Request, District of Columbia Public Service Commission ("Commission") staff requested that the Parties submit a supplemental response stating whether the parties involved in this transaction own or control telecommunications facilities in the District of Columbia. Staff requested this information in order to make a determination as to whether the companies included in this transaction are classified as a "public utility" pursuant to the Commission's rules.<sup>1</sup> Accordingly, in response to the Supplemental Request, the Parties state the following:

Mitel Cloud was approved by the Commission to provide resold local exchange telecommunications services on October 4, 2007 (Order No. 14593).<sup>2</sup> Mitel Cloud neither currently has telecommunications facilities in the District of Columbia, nor currently provides facilities-based services in the District of Columbia.

<sup>1</sup> See 15 D.C. Mun. Regs. § 1599 ("public utility" defined as "any public utility, as defined under" the D.C. Code). See also D.C. Code § 34-214 (defining "public utility").

<sup>2</sup> Approval issued under Mitel Cloud's former name, Inter-Tel Netsolutions, Inc.



Confirmation of assessments paid for retail telecommunications services were also requested in the Supplemental Request. In response to this, the Parties provide the following:

- Pursuant to ASMT2017-37-T, Mitel Cloud paid \$1,210.30 and an OPC assessment of \$682.48.
- Pursuant to ASMT2016-118-T, Mitel Cloud paid \$2,352.11 and an OPC assessment of \$1,415.46.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

Mitel Networks Corporation  
Mitel US Holdings, Inc.  
Mitel (Delaware), Inc.  
Mitel Networks, Inc.  
Mitel Cloud Services, Inc.



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