



VIA ELECTRONIC SUBMISSION

July 26, 2019

Kristi Collins, Commission Secretary
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

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

Dear Ms. Collins,

Enclosed please find for filing an amended request, by Mitel Cloud Services, Inc. (f/k/a Mitel NetSolutions, Inc., "Mitel" or "the Company"), through undersigned counsel, hereby requesting the Public Utility Commission of Oregon cancel its Certificate of Authority ("Certificate") granted on 4/2/2007 in Docket No. CP 1358 to operate as a competitive local exchange reseller and long-distance reseller, and withdraw any tariffs on file, effective as soon as possible.

Mitel's business model has continued to evolve and develop since the Certificate was originally granted. Today, the Company serves its customers through a variety of nomadic interconnected Voice over Internet Protocol (I-VoIP) services as well as private business communication and collaboration solutions. Therefore, the Certificate granted by the Commission is no longer necessary.

The public convenience and necessity will not be adversely affected by the action requested herein. No customer currently receives regulated telecommunications services from the Company, and therefore, no customer will have service interrupted or disconnected. Mitel no longer provides regulated telecommunications services in Oregon 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.

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

Respectfully submitted,

Jonathan S. Marshlian