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August 2, 2017

VIA E-FILING

Oregon Public Utility Commission
201 High St SE, Suite 100
Salem, Oregon 97301
Attn: Filing Center

Re: Docket No. CP-1460; Notification Regarding the Transfer of Indirect Control of Broadview Networks, Inc.

Dear Sir or Madam:

By this letter, Broadview Networks, Inc. ("Broadview Networks"); Broadview Networks Holdings, Inc. ("Broadview Holdings"); and Windstream Holdings, Inc. ("Windstream") (together with Broadview Holdings and the Broadview Networks, the "Parties") notify the Commission that effective July 28, 2017, Windstream acquired indirect control of the Broadview Networks. Commission approval or prior notice was not required for the Transaction. Accordingly, this letter is submitted for informational purposes.

Description of the Parties

A. Windstream

Windstream Holdings, Inc. is a Delaware corporation headquartered at 4001 Rodney Par-ham Road, Little Rock, Arkansas 72212, 501-748-7000. It is a publicly traded (NASDAQ: WIN) Fortune 500 leading provider of advanced network communications and technology solutions for consumers, businesses, enterprise organizations and wholesale customers. Windstream functions as a holding company and does not provide telecommunications services or hold any telecommunications licenses in its own right. Through its wholly owned subsidiary, Windstream Services, a Delaware limited liability company with addresses at the same location as Windstream, it owns and operates a number of licensed telecommunications providers in all states and the District of Columbia, many of which also hold authority from the Federal Communications Commission ("FCC") to provide domestic interstate and international telecommunications services.

In Oregon, Windstream's regulated subsidiaries hold the following authorizations:

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United States

📞 +1.202.739.3000
📠 +1.202.739.3001

1. McLeodUSA Telecommunications Services, LLC is authorized to provide local exchange and interexchange telecommunications services and operator services pursuant to Order No. 09-230 issued in CP-719.
2. PAETEC Communications, Inc. is authorized to provide local exchange and interexchange telecommunications services pursuant to Order No. 04-486 issued in CP-540.
3. Talk America, Inc. is authorized to provide interexchange telecommunications services pursuant to Order No. 01-145 issued in CP-328.
4. Windstream Communications, Inc. is authorized to provide interexchange telecommunications services and operator services pursuant to Order No. 06-040 issued in CP-1310.
5. Windstream Norlight, Inc. is authorized to provide interexchange telecommunications services pursuant to Order No. 07-473 issued in CP-1385.
6. Windstream NuVox, Inc. is authorized to provide local exchange telecommunications services pursuant to Order No. 10-487 issued in CP-1496.
7. Business Telecom, LLC, a North Carolina limited liability company, is authorized to provide interexchange services pursuant to Order No. 05-785 issued in CP-99.
8. CTC Communications Corp., a Massachusetts corporation, is authorized to provide competitive telecommunications services pursuant to Order No. 06-616 issued in CP-856.
9. DeltaCom, LLC, an Alabama limited liability company, is authorized to provide interexchange services pursuant to Order No. 10-314 issued in UM-659.
10. EarthLink Business, LLC, a Delaware limited liability company, is authorized to provide local exchange and interexchange services pursuant to Order No. 08-314 issued in CP-661.

Windstream's combined operations currently have approximately 2.1 million access lines and approximately \$5.39 billion in annual revenues nationwide as of the year end FY2016.¹ Additional information regarding Windstream, including its most recent SEC Forms 10-K and 10-Q, as filed with the Securities and Exchange Commission, is available at <http://investor.windstream.com/investors/index.cfm>.

¹ Windstream's most recent quarterly financial report is available at: <http://abea-43pvyw.client.shareholder.com/investors/>.

B. Broadview

Broadview Holdings is a Delaware corporation with its headquarters located at 800 Westchester Avenue, Suite N501, Rye Brook, New York 10573. Broadview Holdings does not provide telecommunications services in its own right. It owns and operates a number of telecommunications providers in the District of Columbia and all states, except Alaska, many of which also hold authority from the FCC to provide domestic interstate and international telecommunications services. Broadview Holdings, together with its subsidiaries (collectively, "Broadview"), is a network-based business communications provider serving customers with local and long-distance voice and data communications, patented hosted VoIP systems, data services, and a full suite of managed and professional services. It is a leading provider of cloud-based unified communications solutions primarily to small and medium-sized businesses, offering a broad suite of cloud-based services under the OfficeSuite UC brand. Broadview's subsidiaries offer VoIP, Unified Communications as a Service ("UCaaS"), data services (dedicated internet, MPLS, Ethernet), voice services (local, long distance, POTS, VoIP, toll free), and colocation.

In Oregon, Broadview Holding's regulated subsidiary, Broadview Networks, Inc., a New York corporation, is authorized to provide local exchange and interexchange telecommunications services pursuant to Competitive Provider Certificate granted by the Commission in Docket No. CP-1460, Order No. 09-440 on November 4, 2009.

Description of the Transfer of Control

On April 12, 2017, Windstream and Broadview Holdings entered into an Agreement and Plan of Merger (the "Merger Agreement") pursuant to which, among other things, an indirect subsidiary of Windstream created for the purpose of effectuating the transaction ("MergerSub") was merged with and into Broadview Holdings, with Broadview Holdings continuing as the surviving corporation (the "Transaction"). As a result of the Transaction, Windstream is the new ultimate parent company of Broadview Holdings and Broadview Networks. This change in ultimate control did not involve a transfer of operating authority, assets or customers, and the Transaction was virtually seamless to end user customers. The pre-Transaction customers of Broadview Networks remain customers of those entities following the Transaction. Accordingly, customers continue to enjoy the same rates, terms and conditions of service as they did prior to closing. Immediately following consummation of the Transaction, Broadview Networks has continued to offer the same services, rates, terms and conditions pursuant to their existing authorizations, and the only material change resulting from the Transaction is that these certificated entities ultimately are now indirectly owned by Windstream, and subsequently may change their names to reflect the "Windstream" brand in their names.

Diagrams demonstrating the Transaction are appended hereto as **Exhibit A**.

* * * *

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This letter has been electronically filed with the Commission. We would appreciate acknowledgement of receipt and acceptance of this letter. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in cursive script that reads "Danielle Burt".

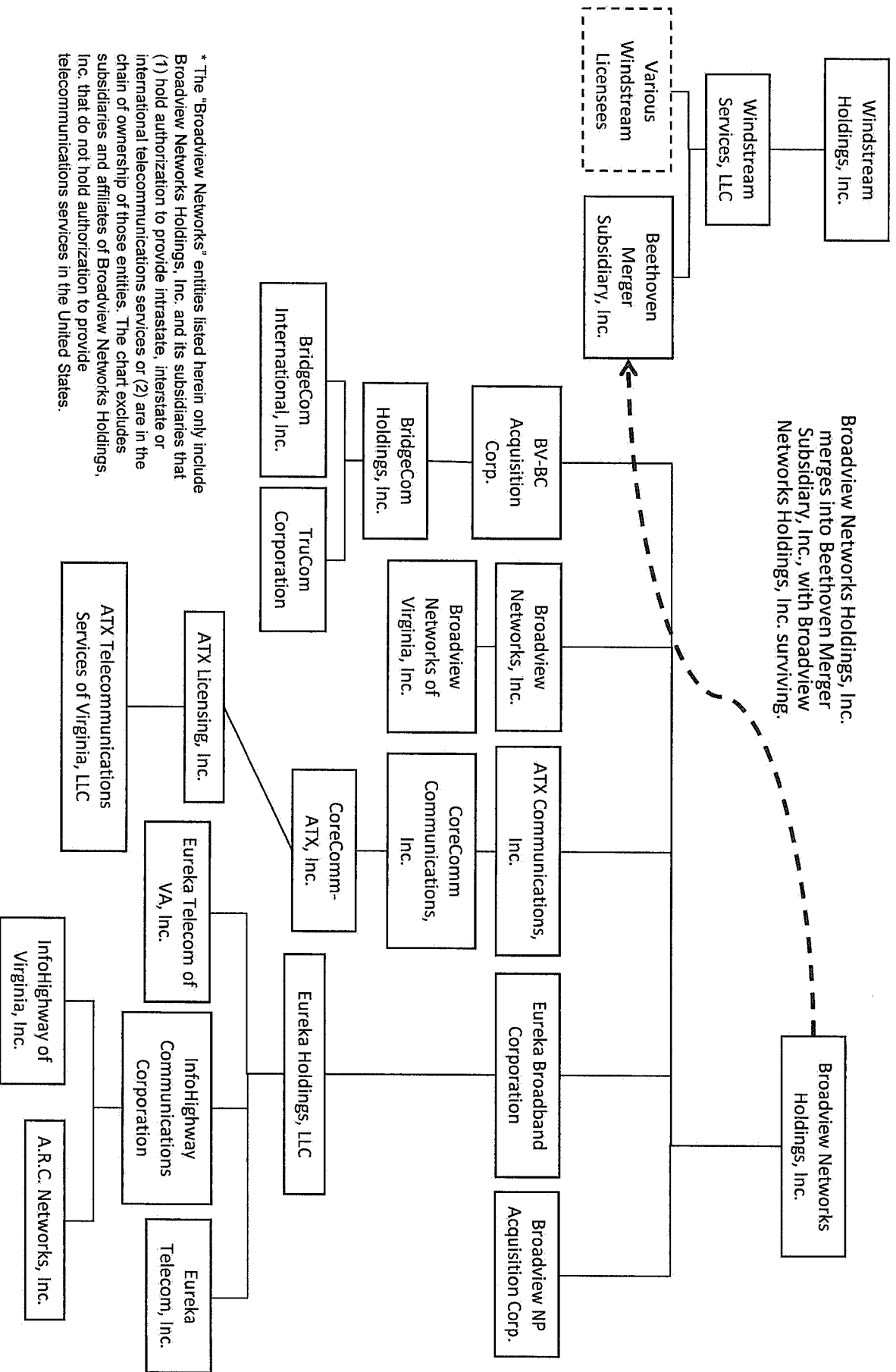
Russell M. Blau
Catherine Wang
Danielle Burt

Counsel for the Parties

EXHIBIT A

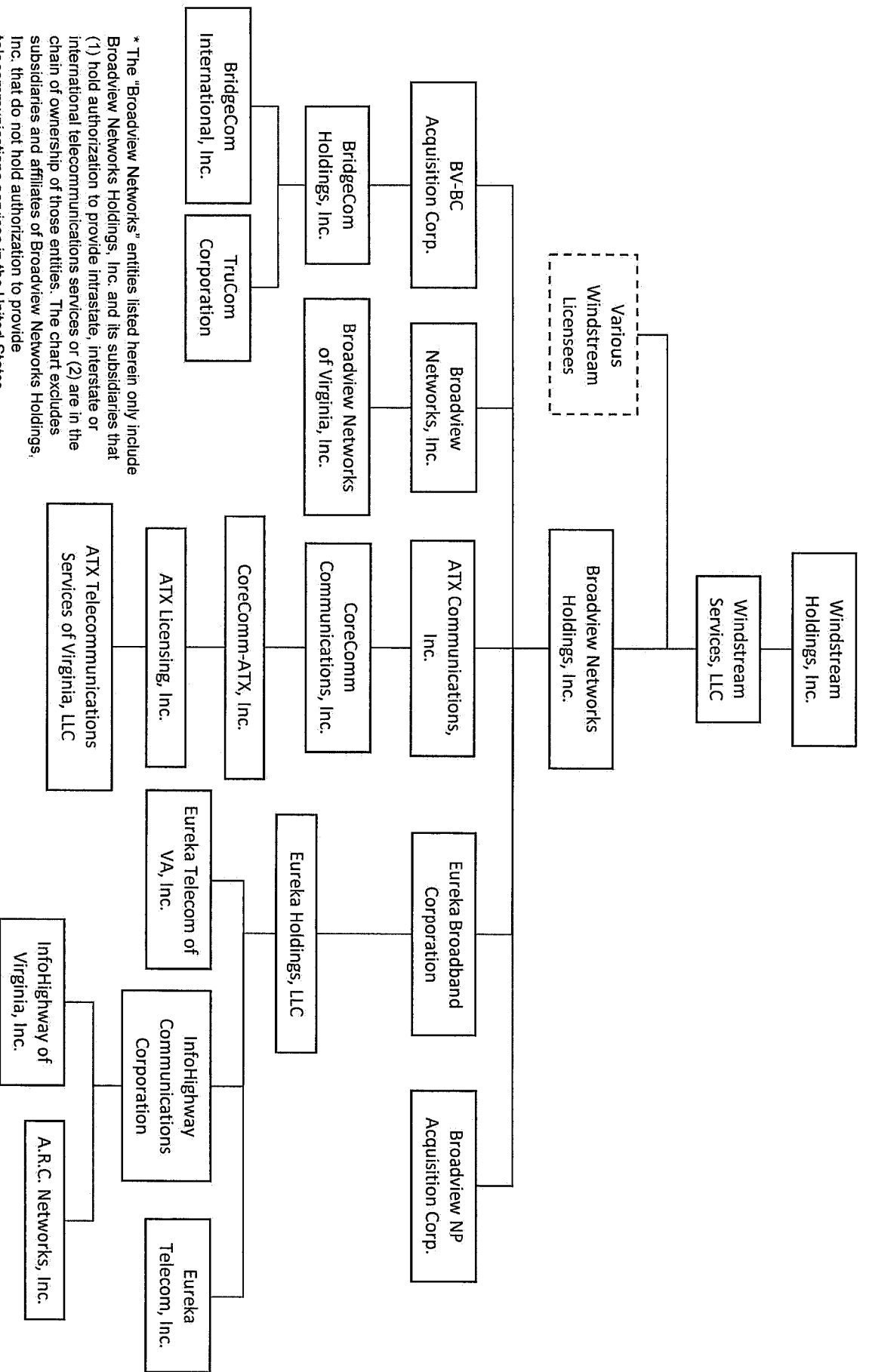
Pre- and Post-Transaction Corporate Ownership Charts

Pre-Transaction Corporate Ownership Structure Charts



* The "Broadview Networks" entities listed herein only include Broadview Networks Holdings, Inc. and its subsidiaries that (1) hold authorization to provide intrastate, interstate or international telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries and affiliates of Broadview Networks Holdings, Inc. that do not hold authorization to provide telecommunications services in the United States.

Post-Transaction Corporate Ownership Structure Charts



* The "Broadview Networks" entities listed herein only include Broadview Networks Holdings, Inc. and its subsidiaries that (1) hold authorization to provide intrastate, interstate or international telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries and affiliates of Broadview Networks Holdings, Inc. that do not hold authorization to provide telecommunications services in the United States.