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& DONAHUE, PLLC**
THE **COMMLAW** GROUP

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VIA OVERNIGHT DELIVERY

July 22, 2019

Earl Taylor
Executive Director
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

05-00272
95-03325

RE: *Mitel Cloud Services, Inc. Notice of Cancellation of Certificates of Public Convenience and Necessity and Withdrawal of Tariffs*

Dear Mr. Taylor,

Mitel Cloud Services, Inc. (f/k/a Mitel NetSolutions, Inc., "Mitel" or "the Company"), through undersigned counsel, respectfully requests that the Tennessee Public Utility Commission cancel its Certificates of Public Convenience and Necessity ("CPCNs") – granted on 1/3/2006 (Docket No. 05-00272) and 8/13/1995 (Docket No. 95-03325) to operate as a competitive local exchange reseller and a long-distance reseller, as soon as permitted upon receipt of this notice.

Mitel's business model has continued to evolve and develop since the CPCNs were 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 CPCNs granted by the Commission are 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 Tennessee 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.

Please acknowledge receipt of this filing by date-stamping the extra copy of this letter and returning it in the self-addressed, stamped envelope provided.

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

Respectfully submitted,

Jonathan S. Marashlian