

VIA OVERNIGHT DELIVERY

July 31, 2019

Mark Johnson, Executive Director
Washington Utilities & Transport Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: *Mitel Cloud Services, Inc. – Request to Cancel Certificates of Public Convenience and Necessity and Withdraw Tariffs*

Dear Mr. Johnson,

Please find enclosed for filing the original and one copy of this letter, by Mitel Cloud Services, Inc. (f/k/a Mitel NetSolutions, Inc., "Mitel" or "the Company"), through undersigned counsel, hereby requesting cancellation of its Certificates of Public Convenience and Necessity ("CPCNs") and the withdrawal of any applicable tariffs, effective as soon as possible. Mitel is currently registered as a telecommunications company with the UBI 601 557 673. A Request for Cancellation of Registration form signed by a Company officer is attached.

Mitel was granted CPCNs to provide local exchange and interexchange services throughout Washington in Docket No. UT-051562, on 11/11/2005, and Docket No. UT-910451, on 5/15/1991. Mitel asserts that there are no customers whose service would be impacted by this cancellation.

Mitel's business model has continued to evolve and develop since the CPCNs were originally granted. Today, the Company serves its customers through VoIP and a variety of nomadic interconnected 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 described herein. No customer is currently receiving regulated telecommunications services from the Company, and therefore, no customer will have service interruptions or disconnections. Mitel no longer provides regulated telecommunications services in Washington 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.

To the best of its knowledge, the Company is current on all reporting and fee remittance obligations.

Wherefore, Mitel hereby requests cancellation or withdrawal of its Washington CPCNs and tariffs as soon as the Commission can take appropriate administrative action.

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

Virgil
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UT-051562
COMMISSION

Page 2

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,

A handwritten signature in black ink, appearing to read 'jsm', is written in a cursive style.

Jonathan S. Marashlian

Cancellation of Registration

REQUEST FOR CANCELLATION OF REGISTRATION

TO: Washington Utilities & Transportation Commission
Attention: Telecommunications Section
P.O. Box 47250
Olympia, WA 98504-7250
(Fax) 360-586-1150

Docket UT- _____
(Commission Use Only)

The undersigned, _____ Gregory Hiscock _____ does hereby
(Issuing Agent/Officer of Company)

request cancellation of __Mitel Cloud Services, Inc. _____ registration
(Registered Company Name)

to operate as a telecommunications company doing business in the state of Washington.

Please include the following information:

Unified Business Identification (UBI) Number: ___601 557 673_____

Company Contact Person: ___Jonathan Marshlian_____

Contact Telephone Number: ___703 714 1313_____

The undersigned certify that they have no existing customers and no outstanding prepaid calling services.

I understand that this request is not effective until acknowledged upon by the Commission.

Signature:  _____

Date: July 30, 2019