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January 27, 2025

VIA EMAIL TO dtc.efiling@mass.gov

Department Secretary
Massachusetts Department of Telecommunications and Cable
1000 Washington Street
Boston, MA 02118
(617) 305-3580

Re: D.T.C. 23-5; Motion for Withdrawal

Dear Sir/Madam:

On behalf of TERRACOM INC. d/b/a Maxsip Tel, attached for filing please find a **Motion for Withdrawal of Petition for Designation as an Eligible Telecommunications Carrier Without Prejudice.**

Please acknowledge receipt via return email. If you have any questions or if we may provide you with any additional information, please do not hesitate to contact us.

Respectfully submitted,

/s/ Lance J.M. Steinhart
Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorney for TERRACOM INC. d/b/a Maxsip Tel

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Petition of TERRACOM INC. d/b/a Maxsip Tel

for Designation as an Eligible Telecommunications
Carrier in the Commonwealth of Massachusetts

Docket No. D.T.C. 23-5

MOTION FOR WITHDRAWAL

Pursuant to 207 CMR 1.04(4)(b), TERRACOM INC. d/b/a Maxsip Tel (“TERRACOM” or the “Company”), respectfully requests that its Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Massachusetts filed on October 11, 2023 (the “Petition”) in the above-referenced docket be withdrawn without prejudice. TERRACOM also requests that any confidential and proprietary information provided by TERRACOM, including those identified in the Motion for Protective Order filed on October 11, 2023 in the docket (collectively, the “Protected Information”), be destroyed by the Department of Telecommunications and Cable (the “Department”) or returned to TERRACOM and removed from the docket. As grounds for this Motion for Withdrawal (“Motion”), TERRACOM states as follows:

- (a) TERRACOM intends to re-file a new petition at a later date with updated information and does not believe it would be an efficient use of the Department’s time to proceed with the current Petition.
- (b) Withdrawal of the Petition without prejudice will allow the parties and the Department to conserve their resources and advance the interests of administrative efficiency.

(c) For these reasons, good cause exists to grant the instant Motion.

CONCLUSION

For the reasons above, TERRACOM requests that the Department grant TERRACOM's Motion for Withdrawal without prejudice, and destroy or return the confidential and proprietary information described above.

Respectfully submitted,



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