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Little Rock, AR 72202  
P.O. Box 2177, 72203-2177  
501-905-8144  
fax 501-905-5679

Bob Priebe  
Staff Manager  
State Government Affairs



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2003 SEP 30 AM 9:54

T.R.A. DOCKET ROOM

September 29, 2003

Mr. Ron Jones  
Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

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RON JONES

SEP 30 2003

TN REGULATORY AUTHORITY

RE: Docket No. 03-00502  
Response to Inquiry pertaining to Compliance with  
TN Code Ann. 65-21-114

Dear Mr. Jones:

In your Notice of Filing in Docket No. 03-00502 dated September 16, 2003 you directed all facilities based providers and resellers of telecommunications services certificated in the State of Tennessee to respond to certain inquiries pertaining to countywide calling. ALLTEL Communications, Inc. ("ACI") is certified in Tennessee as a long distance provider and as a provider of resold CLEC services.

On July 20, 2001 the Office of the Attorney General for the State of Tennessee issued Opinion No. 01-115 in response to the question, "Is Tenn. Code Ann. § 65-21-114, in requiring all telephone calls placed between two points in the same county to be toll-free, constitutional as applied to interexchange or long distance carriers?"

In response, the Attorney General issued this opinion: "While Tenn. Code Ann. § 65-21-114 is constitutional in most of its applications, it would be unconstitutional to apply this statute to a long distance telephone carrier under circumstances where the carrier does not receive reasonable remuneration for the service it is required to provide."

As a long distance provider, ACI would not receive any remuneration for intra county calls. As such, ACI does not believe that its long distance service is subject to countywide calling service requirements.

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Staff Manager  
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As a provider of resold CLEC services, ACI currently has no customers in the state of Tennessee. However, should ACI decide to actively enter the CLEC market in Tennessee it would answer the inquiries as follows:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a). If you do not currently take steps to ensure compliance with 65-21-114(a), explain your reason for not doing so.

ACI RESPONSE: As stated above, ACI, as a provider of resold CLEC services, currently has no customers in the state of Tennessee. However, should ACI decide to actively enter the CLEC market in Tennessee and render bills to customers, ACI would utilize the industry TAR code file to qualify a call for countywide purposes.

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

ACI RESPONSE: ACI affiliates have had experience in other states utilizing the TAR code file. Any problems that arise seem to be mainly associated with timeliness of the file updates and with other carriers updating the file.

- Provide a suggestion for how this workshop should proceed.

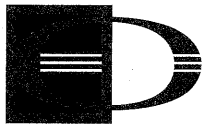
ACI RESPONSE: Since ACI is not presently serving CLEC customers in Tennessee, it offers no suggestions as to how this workshop should proceed.

If you have any questions please call me at (501) 905-8144.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Priebe', with a long horizontal line extending to the right.

Bob Priebe  
Staff Manager – State Government Affairs



**EVERCOM**

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September 26, 2003

Tennessee Regulatory Authority  
Attn: Mr. Ron Jones, Director  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Evercom Systems, Inc.  
Response to Docket #03-00502

Dear Mr. Jones:

In accordance with Docket #03-00502, and the advice of Mr. Louis DeBoard in the Consumer Services division of your agency, Evercom Systems, Inc. hereby submits its response prior to the specified October 1, 2003 deadline. Evercom Systems, Inc. is an inmate telecommunications service provider for correctional facilities across the United States on a contractual basis. As such, inmate providers, as COCOT's, are not subject to the county-wide calling statute.

Should you have any further questions, please contact the undersigned at (972) 953-4123.

Sincerely,

Colleen Dziuban  
Director – Governmental Affairs  
Evercom, Inc.  
8201 Tristar Drive  
Irving, TX 75062

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SEP 30 2003

TN REGULATORY AUTHORITY



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Winter Park, FL  
32789

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September 29, 2003  
**Via Overnight Delivery**

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SEP 30 2003

TN REGULATORY AUTHORITY

Mr. Ron Jones  
Director/Moderator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219-0412

**Re: Docket 03-00502: Implementation of County Wide Calling  
Response of T-NETIX Telecommunications Services, Inc.**

Dear Mr. Jones:

T-NETIX Telecommunications Services, Inc. ("T-NETIX") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

T-NETIX is authorized to provide calling services to inmates in confinement institutions in Tennessee. At this time, however, T-NETIX is not providing service in Tennessee. Should T-NETIX secure a contract with a Tennessee confinement institution the Company would be able to purchase the necessary data bases in order to distinguish intracounty calls, and zero rate them, if this would be required.

T-NETIX has no suggestions as to how the proposed workshop should proceed.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-3004 or via e-mail at [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton, Consultant to  
T-NETIX Telecommunications Services, Inc.

cc: Kendall Hollon, T-NETIX  
File: T-NETIX - TN - Inmate  
TMS: TNx0302