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September 22, 2008

Chairman Tre Hargett
c/o Ms. Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

filed electronically in docket office on 09/22/08

***Re: Rulemaking to Establish Requirements and Funding Mechanisms to Support
Telecommunications Services for Individuals with Hearing Loss and Speech
Disabilities
Docket No. 05-00237***

Dear Chairman Hargett:


Enclosed please find an original and 13 sets of copies of Tennessee Rural Coalition's comments on the proposed TRA Rule 1220-4-14.

Please return two (2) copies of this filing to me by way of our courier, which I would appreciate your stamping as "filed."

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

With kindest regards, I remain

Sincerely,



R. Dale Grimes

RDG:lfr

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: Rulemaking To Establish Requirements And)
Funding Mechanisms To Support)
Telecommunications Services For Individuals With)
Hearing Loss And Speech Disabilities)

Docket No.
05-00237

COMMENTS OF THE TENNESSEE RURAL COALITION ON
PROPOSED TRA RULE 1220-4-14

A. INTRODUCTION

The Tennessee Rural Coalition (Coalition) respectfully submits the following comments in the matter of Proposed Rule §1220-4-14, Telecommunications Rule Governing the Operations and Funding Mechanism for the Tennessee Relay Service. The Coalition represents nineteen rural local exchange carriers (ILECs) and cooperatives providing service in Tennessee.¹

II. SPECIFIC COMMENTS

The Coalition's position is that all the service providers as stated in the Tennessee Regulatory Authority broad based definition of "Contributing Service Provider" (Rule §1220-4-14-.01) should be required to support the Tennessee Relay Service ("TRS") based on an annual assessment amount to pay the costs incurred by the TRS provider. The Coalition believes that

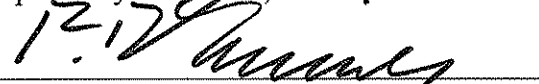
¹ Ardmore Telephone Company; Ben Lomand Telephone Cooperative; Century Telephone Enterprises, Inc. Companies in Tennessee consisting of CenturyTel of Adamsville, Inc., CenturyTel of Claiborne, Inc. and CenturyTel of Ooltewah-Collegedale; Dekalb Telephone Cooperative; Highland Telephone Cooperative; Loretto Telephone Company; Millington Telephone Company; North Central Telephone Cooperative, the TDS Telecom Companies in Tennessee consisting of Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tennessee Telephone Company, and Tellico Telephone Company; the Telephone Electronics Corp. ("TEC") companies in Tennessee consisting of Crockett Telephone Company, Inc., Peoples Telephone Company, Inc. and West Tennessee Telephone Company, Inc.; Twin

service providers of voice grade end user access lines or their equivalent should be required to contribute to the TRS on a competitively neutral basis. The service providers should include ILECs, CLECs, CMRS and VOIP providers. All of these providers benefit from the TRS and should be assessed to pay for the costs incurred by the TRS provider for providing this service in Tennessee.

Rule 1220-4-14-.05 - TRS Funding Mechanism

The Coalition generally supports this TRA rule section but offers an observation regarding Rule 1220-4-14-.05(2) concerning the assessment of the annual cost of the TRS. The Coalition believes that to ensure that all service providers are assessed equitably and in a nondiscriminatory, competitively and technologically neutral manner, the TRA should require all service providers to submit the Federal Communications Commission ("FCC") Form 477. The use of this Form will ensure that all service providers are providing data in a consistent manner. The Coalition believes that the TRA should require that CMRS and VOIP providers file their Form 477 with the TRA or at a minimum the CMRS and VOIP providers should be required to file a certified statement (affidavit) indicating the number of their wireless and VOIP customers. The Coalition understands that VOIP providers will be required to file the FCC Form 477 beginning March 2009.

Respectfully submitted,



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Attorneys for the Tennessee Rural Coalition

Lakes Telephone Cooperative; United Telephone Company; and Yorkville Telephone Cooperative.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by way of the method indicated on September 22, 2008, upon:

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Vance L. Broemel, Esq.
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