



August 29, 2005

Tennessee Regulatory Authority  
Attn: Docket Manager  
460 James Robertson Parkway  
Nashville, TN 37243-0505

To Whom It May Concern:

Loretto Communication Services, Inc. has included the reseller application fee for \$50.00 and tariff with copies. This will go with Loretto Communication Services, Inc.'s reseller application package that Lisa Foust has on her desk. Please assign a docket number and pass to Lisa Foust.

If you have any further questions, please call Cindy Rothstein at (931) 853-4351.

Sincerely,

A handwritten signature in cursive script that reads "Louise Brown".

Louise Brown,  
President

PO Box 26  
136 S Main Street  
Loretto, Tennessee 38469

Phone: 931.853.4351  
Fax: 931.853.4329

APPLICATION FOR CERTIFICATE  
TO PROVIDE OPERATOR SERVICES AND/OR  
RESELL  
TELECOMMUNICATION SERVICES IN TENNESSEE  
SECTION A

Application is hereby made for a certificate of authority pursuant to TRA Rule 1220-4-2-.57 to provide telecommunications services in the State of Tennessee.

Part I: General Information

A. Name of Applicant Loretto Communication Services, Inc.  
Full exact name of person, corporation, partnership, sole proprietorship, or other entity, for which application is made.

Legal name of applicant, if different from above.

P.O. Box 26  
136 S. Main St. Loretto TN 38469  
Address City State Zip

Tenn. Secretary of State Certificate of Authority ID 0389664

Federal Taxpayer ID Number 62-1820705

Social Security Number for Applicants

Applying as Individuals N/A

Any trade name(s), assumed name(s) or fictitious name(s) used by applicant:

Loretto Telecom - See Attachment 5

If applicant has affiliate(s) engaged in providing telecommunications services, provide the above requested information for each affiliate(s), as well as for the applicant.

Affiliate - Loretto Telephone Company, Inc - AS An incumbent LEC.  
Address P.O. Box 130; 136 S. Main St. City Loretto

State TN Zip Code 38469 Phone No. (931) 853-4351  
(Use additional pages if necessary)

**\*\*\*IMPORTANT INFORMATION\*\*\***

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information on all parts of this application as well as for the applicant. Provide this information on a separate attachment, if necessary. (See Attachment 1)

THIS SECTION FOR TRA USE ONLY

Docket Number. 05-00743

Company ID Number 128629

Date Approved \_\_\_\_\_

Evaluator \_\_\_\_\_

- B. Describe other businesses or business transactions, if any, at the same location as the principal business address: Loretto Telephone Company, Inc - Regulated phone company. LTC Holding Company - parent company for Loretto Telephone Company Inc and Loretto Communication Services, Inc.
- C. Provide the name, business and home address of and a chronological summary of the employment history and business experience over the preceding eight years of:  
(See Attachment 2)
- (a) The proprietor, if the applicant is an individual;
  - (b) Every member, if the applicant is a partnership;
  - (c) Each Executive Officer, Director and each Key Stockholder if the applicant is a joint stock association or a corporation. (Note: If the applicant is a publicly traded corporation or a subsidiary of such a corporation it does not need to provide this information)
  - (d) Any person in a position to exercise control over or direction of, the business of the applicant, regardless of the form of organization of the applicant.

Information to be included:

NAME TITLE

BUSINESS ADDRESS

PHONE No.

HOME ADDRESS

PHONE No.

EMPLOYMENT HISTORY

**Provide the above requested information on separate attachments.**

- D. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business whose authority to transact business was denied, revoked or suspended by a state or federal regulatory or law enforcement entity?  
\_\_\_\_\_ Yes X No If yes, please explain fully.
- E. Has the Tennessee Regulatory Authority, or any other agency of the State of Tennessee, any federal agency or any agency of any other state ever initiated a regulatory action or order against the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust)?  
X Yes \_\_\_\_\_ No If yes, please explain fully. (See Attachment 3)
- (1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust), been enjoined or restrained by order by any court or state or federal regulatory or law enforcement entity from engaging in any conduct or practice related to the telecommunications business? \_\_\_\_\_ Yes X No If yes, please explain fully.
- F. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business who has ceased providing telecommunications services in any state, describe the circumstances. (Use additional pages if necessary)

No

- G. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been convicted of any crime or crimes, or charged in court with any fraudulent or dishonest acts in any transaction of any kind, or confined in any penal institution? If so, list such persons, give details, state results and final outcome. (Use additional pages if necessary) NO

(1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been indicted, convicted, pled guilty or pled nolo contendere to a felony in Tennessee or elsewhere?

       YES   X   NO If yes, please explain fully.

- H. Name and telephone number of contact person authorized to respond to Authority inquiries regarding company operations Monday through Friday.

Desda K. Hutchins (931) 853-4351 (931) 853-4329  
Name Phone No. Fax No.

(800) none e-mail Address desda@lorettotel.net

(1) Name and telephone number of contact person authorized to respond to Authority inquiries regarding this filing Monday through Friday.

A.J. Passarella (931) 853-4351 (931) 853-4329  
Name Phone No. Fax No.

(800) none e-mail Address ajap@lorettotel.com

- I. List a toll-free telephone number and mailing address that consumers can call or write to report service problems and/or request refunds or adjustments.

<u>(931) 853-4351</u>	<u>none</u>
PHONE NUMBER	ALTERNATE PHONE NUMBER
<u>P.O. Box 26</u>	<u>Loretto TN 38456</u>
ADDRESS	CITY ST ZIPCODE

- (J) Provide the name and address of the registered agent for service of process:

Desda P. Hutchins  
136 S. Main St., Loretto, TN 38469

- (K) Identify all authorized agents in the state, if any by name, address, business and home phone numbers and any other businesses conducted by the agent at the same location: (use additional sheets if necessary) N/A

Part II:

- A. Check the type of telecommunication services you plan to provide in Tennessee.

  X   Resell Interexchange long distance services  
       Operator Services  
       Resell local services  
       Other (describe) \_\_\_\_\_

- B. If providing operator services, list company name, address and contact person for all reseller carriers you serve in Tennessee. Provide the above information on Appendix I.

N/A

- C. List the state(s) where the applicant, its parent company, and all affiliates is authorized to operate in at this time. For each such state, describe applicant's current activities along with a history of operations there. (Use additional pages if necessary.)

Tennessee

For the above states, list the number and types of complaint(s) filed against applicant, and the complaint(s)' current status. Provide this information on a separate attachment, if necessary.

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information for all as well as for the applicant. Provide this information on a separate attachment, if necessary. (see Attachment 4)

- D. List any states that the applicant or any affiliate, parent company, or constituency corporation operating under any trade name, assumed name, or fictitious name, has been denied authority to provide service. (Use additional pages if necessary)

none

- E. Areas in Tennessee to be served.

Lawrence County Tennessee

- F. What type of customers will the applicant serve?

- a. Business X  
b. Residential X  
c. Aggregators X  
(e.g. Hotels, Payphones)  
d. Other (specify) \_\_\_\_\_

- G. Does the applicant allow a property imposed fee (PIF) to be added to the price of intrastate telephone calls over its network? If yes, specify amount. NO

- H. Are your prices for intrastate services plus any PIF equal to or less than the dominant carriers' price for similar services? Yes X No \_\_\_\_\_

- I. Describe the type of services and price that the applicant will be offering in Tennessee on the Informational Tariff Form found in Appendix II<sup>1</sup>.

- J. What is the applicant's 10XXX or 800 access code, if applicable? Neustar will not issue these codes until reseller Application is approved by TRA. we will provide this information to the TRA as they are issued to us.

- K. Does the applicant now have or plan to have any telecommunication's facilities (e.g. switches, fiber lines) in Tennessee? Not at this time. we

may look at facilities in the future.

<sup>1</sup>Applicant is required to fill out an Informational Tariff form. Failure to fill out this form will cause the applicant's request to be rejected.

L Whose facility-based network(s) will the applicant be reselling?                     

MCI, AT&T, ANPI

M Will the applicant be utilizing the local telephone company's billing system or billing customers directly? Loretto Communication Services, Inc. does the billing for Loretto Telephone Company, Inc. They do combined billing to the customer.  
N Describe briefly how the applicant plans to market their services in Tennessee?

Marketing will be through bill inserts, brochures, radio/newspaper ads, mailouts and word of mouth.

O If independent telemarketers are to be used, list the name, contact person, address phone number and federal taxpayer ID for each company.

N/A

COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
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COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
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COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
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COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
--------------	---------	---------	------	----	-----	-------

P Describe the methods and procedures by which the applicant will use to switch a consumer's preferred interexchange service, and to prevent unauthorized switching of a consumer's interexchange service. Use additional pages if necessary. If you have written procedures or company guidelines, attach copies.

Loretto Telecom will follow FCC & Tennessee Regulatory Authority guidelines in switching consumer's to Loretto Telecom's CIC code for 1+ dialing. All LOA signed by consumer will be issued to Loretto Telephone Company, Inc. to have consumer's PIC(s) changed, or the consumer can call the Loretto Telephone Company, Inc. service representative and request a PIC change via telephone.

Q. Applicant has the ability and agrees to honor the form of call blocking that the consumer has subscribed to with their local telephone company. Yes X No       

R Applicant gives permission to the local telephone company to provide the Authority a periodic sample of the reseller's intrastate toll calls. The purpose of this analysis is to audit the reseller's rates to assure they are at or below the dominant carrier's tariffed rates. Yes X No       

<sup>2</sup>A copy of a bill is required if the applicant is going to bill the customer directly.

Part III: Organization Structure

A. Applicant's organizational structure

X Corporation

\_\_\_\_\_ Publicly Traded Corporation

\_\_\_\_\_ Subsidiary of a Publicly Traded Corporation

\_\_\_\_\_ Limited Liability Corporation    Attach a copy of the articles of organization and operating agreement along with amendments.

X Other Form of Corporation

List type "C" Corporation (Example S Corporation)  
Attach a copy of the charter, bylaws and/or certificate of incorporation.

\_\_\_\_\_ Association    Attach a copy of the charter, bylaws and/or certificate of incorporation and Letter of Authorization from Tennessee Secretary of State

\_\_\_\_\_ Joint Stock Association    Attach a copy of the charter, bylaws and/or certificate of incorporation and Letter of Authorization from Tennessee Secretary of State.

\_\_\_\_\_ Trust    Attach a copy of the trust agreement and Letter of Authorization from Tennessee Secretary of State.

\_\_\_\_\_ Individual    Attach a copy of the Letter of Authorization from Tennessee Secretary of State

**SECTION (a)-(g) is to be completed if applicant is a Corporation Association or Trust** N/A

(a) The date and state of formation/incorporation: \_\_\_\_\_

(1) Parent Company, if applicable \_\_\_\_\_

(b) Attach a certificate of good standing from the state in which the applicant was incorporated/formed.

(1) Attach a copy of Certification of Authority issued by Tennessee Secretary of State showing corporation's authority to engage in business in Tennessee.

(d) Describe the corporate structure of the applicant, including the identity of any parent or subsidiary of the applicant. Disclose whether any parent or subsidiary is publicly traded on any stock exchange.

(e) Provide the history of material litigation and criminal convictions of every current director, executive officer, or key shareholder of the applicant for the ten-year period prior to the date of this application.

(f) If applicable, attach a copy of the instrument creating the trust and all amendments thereto:

N/A B. \_\_\_\_\_ Proprietorship

\_\_\_\_\_ Partnership

- \_\_\_\_\_ General Attach a copy of the partnership agreement along with any amendments.
- \_\_\_\_\_ Limited Attach a copy of the certificate of limited partnership and the partnership agreement along with any amendments.
- \_\_\_\_\_ Other (Explain on separate sheet)

All of the above will be required to submit a valid business license.

- (a) Identify the place and date of the applicant's qualifications to provide telecommunications services in this state.
- (b) List the full name, social security number and address of the owners, if a sole proprietorship, or all partners identifying the percentage of ownership:  
**ATTACH ADDITIONAL PAGES AS NECESSARY**

C. Number of employees: none.

Employer Identification Number (E.I.N.) 62-1820705

Part IV: Financial Information

A. Address where business records are kept: 136 S. Main St  
Loretto TN 38469 (931) 853-4351  
CITY STATE ZIP CODE PHONE NUMBER

B. Attach a copy of the applicant's most recent unconsolidated and consolidated audited financial statements for the immediately preceding three-year period. Provide in detail the applicant's financial condition, including balance sheet and income statement, or a copy of IRS form 1120 or 1065 filed by your business for the previous year. Attach, if available, a copy of your company's 10K and/or stockholder reports.

(1) Fiscal year end: Month December Day 31

(2) Date of most recent audited, unconsolidated financial statement of Applicant:  
Financial statements are unaudited and compiled.

(3) If applicable, name and address of independent certified public accountant:

Auditor used for compiled Financial statements is  
York, Dillingham & Company Certified Public Accountants

(4) Period covered by financial statement attached: 2002-2004

C. Does the applicant currently have an internal auditor and/or internal audit program? No

If so, Name of internal auditor N/A

D. If applicable, provide a history of applicant's material litigation and criminal convictions for the ten-year period prior to the date this application is made. Material litigation is defined as any litigation that, according to generally accepted accounting principles, is deemed significant to a person's financial health and would be required to be referenced in annual audited financial statements, reports to shareholders or similar documents. none



**Part VI: Rule Compliance Agreement**

- A. Attach a copy of a Small and Minority-Owned Telecommunications Business Participation Plan Pursuant to Tennessee Code Annotated § 65-5-212. (See Attached)
- B. Have you read and understand the Tennessee Regulatory Authority's (TRA) Rules and Regulations for Resellers, 1220-4-2 located at the TRA's website <http://www.state.tn.us/tra> *electronic fileroom* in its entirety?  
\_\_\_\_\_X\_\_\_\_\_ Yes \_\_\_\_\_ No
- C. Do you understand the penalties for non-compliance, and all associated fees to provide such service? \_\_\_\_\_X\_\_\_\_\_ Yes \_\_\_\_\_ No

Mail the completed application and a check for \$50.00 to: Tennessee Regulatory Authority, P.O. Box 198907, Nashville, TN 37219-8907. Should you have any questions, call (615) 741-7489, ext. 163.

The Reseller or Operator Service Provider applicant, hereby, affirms the following:

Will comply with the TRA Reseller Rules and all other applicable Authority Rules and state laws, including T.C.A. Section 65-5-206 located at the TRA's website <http://www.state.tn.us/tra> *electronic fileroom* under the External Site of Lexis Law Publishing.

**Having been duly sworn, and under the penalties of perjury, I hereby certify that the representations in this RESELLER APPLICATION and all attachments and appendices are true and correct to the best of my knowledge and belief. I further understand that omissions or inaccuracies may result in denial of the APPLICATION and grounds for revocation of Certificate of Authority.**

For Individual and Partners:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
PRINTED NAME

\_\_\_\_\_  
PRINTED NAME

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
PRINTED NAME

\_\_\_\_\_  
PRINTED NAME

For Corporations  
and Other Organizations

Lotto Communication Services, Inc.  
(NAME OF CORPORATION)

BY:

Louise Brown  
SIGNATURE

Louise Brown  
PRINTED NAME

President  
Title

ATTEST:

Aesda K. Hutchins  
Secretary  
Title

On this the 18<sup>th</sup> day of August, 2005 before me, a Notary Public

Louise Brown

known to me to be the person(s) named in, and who executed the foregoing application, being duly sworn according to law, deposes and says that the statements and representations set forth in the above application are true and correct to the best of his/her knowledge and belief.

Caraleyn Thompson  
Notary Public

seal

My Comm. Exp. 2/4/2007

**Secretary of State**

Attachment 5

**Division of Business Services****312 Eighth Avenue North****6 Floor, William R. Snodgrass Tower****Nashville, Tennessee 37243**

DATE: 03/25/03  
REQUEST NUMBER: 4765-1668  
TELEPHONE CONTACT: (615) 741-2286  
FILE DATE/TIME: 03/25/03 1054  
EFFECTIVE DATE/TIME:  
CONTROL NUMBER: 0389664

TO:  
NEAL & HARWELL, PLC  
150 FOURTH AVE N  
STE 2000  
NASHVILLE, TN 37219-2498

RE:  
LORETTO TELECOM  
APPLICATION FOR REGISTRATION OF ASSUMED CORPORATE  
NAME

THIS WILL ACKNOWLEDGE THE FILING OF THE ATTACHED ASSUMED NAME  
REGISTRATION FOR A FIVE YEAR PERIOD BEGINNING WITH AN EFFECTIVE DATE AS  
INDICATED ABOVE.

THE CORPORATION MAY RENEW THE RIGHT TO USE THIS NAME WITHIN TWO  
(2) MONTHS PRECEDING THE EXPIRATION OF SUCH RIGHT, FOR A PERIOD OF FIVE (5)  
YEARS, BY FILING AN APPLICATION WITH THE SECRETARY OF STATE.

WHEN CORRESPONDING WITH THIS OFFICE OR SUBMITTING DOCUMENTS FOR  
FILING, PLEASE REFER TO THE CORPORATION CONTROL NUMBER GIVEN ABOVE.

-----  
FOR: APPLICATION FOR REGISTRATION OF ASSUMED CORPORATE ON DATE: 03/25/03  
NAME

FROM:  
NEAL & HARWELL, PLC  
2000 FIRST UNION TWR  
150 FOURTH AVE NORTH  
NASHVILLE, TN 37219-0000

	FEE	
RECEIVED:	\$20.00	\$0.00
TOTAL PAYMENT RECEIVED:		\$20.00

RECEIPT NUMBER: 00003247022  
ACCOUNT NUMBER: 00311571



SS-4458

RILEY C. DARNELL  
SECRETARY OF STATE

4 1 5 5 1 5 5 3

**APPLICATION FOR RESERVATION OF  
ASSUMED CORPORATE NAME**RECEIVED  
OF TENNESSEE

Pursuant to the provisions of Section 48-14-101(d) of the Tennessee  
Corporation Act, the undersigned corporation hereby submits this application for the registration  
of an assumed corporate name:

1. The true name of the corporation is Loretto Communication Services, Inc.
2. The corporate control number is 0389664.
3. The state or county of incorporation is Tennessee.
4. The corporation intends to transact business in Tennessee under an assumed corporate name.
5. The assumed corporate name the corporation proposes to

LORETTO TELECOM

LORETTO COMMUNICATION  
SERVICES, INC.

By: Desda Passarella Hutchins, Secretary  
Desda Passarella Hutchins, Secretary

Dated: March 20, 2003

RECEIVED  
OF TENNESSEE  
MAY 25 AM 10:54  
RILEY DARNELL  
SECRETARY OF STATE

Secretary of State

Corporations Section

James K. Polk Building, Suite 1800

Nashville, Tennessee 37243-0306

DATE: 05/18/00  
REQUEST NUMBER: 3905-1557  
TELEPHONE CONTACT: (615) 741-2286  
FILE DATE/TIME: 05/18/00 1313  
EFFECTIVE DATE/TIME: 05/18/00 1313  
CONTROL NUMBER: 0389664

TO:  
NEAL & HARWELL PLC  
150 4TH AVE

NASHVILLE, TN 37219

RE:  
LORETTO COMMUNICATION SERVICES, INC.  
CHARTER - FOR PROFIT

CONGRATULATIONS UPON THE INCORPORATION OF THE ABOVE ENTITY IN THE STATE OF TENNESSEE, WHICH IS EFFECTIVE AS INDICATED.

A CORPORATION ANNUAL REPORT MUST BE FILED WITH THE SECRETARY OF STATE ON OR BEFORE THE FIRST DAY OF THE FOURTH MONTH FOLLOWING THE CLOSE OF THE CORPORATION'S FISCAL YEAR. ONCE THE FISCAL YEAR HAS BEEN ESTABLISHED, PLEASE PROVIDE THIS OFFICE WITH THE WRITTEN NOTIFICATION. THIS OFFICE WILL MAIL THE REPORT DURING THE LAST MONTH OF SAID FISCAL YEAR TO THE CORPORATION AT THE ADDRESS OF ITS PRINCIPAL OFFICE OR TO A MAILING ADDRESS PROVIDED TO THIS OFFICE IN WRITING. FAILURE TO FILE THIS REPORT OR TO MAINTAIN A REGISTERED AGENT AND OFFICE WILL SUBJECT THE CORPORATION TO ADMINISTRATIVE DISSOLUTION.

WHEN CORRESPONDING WITH THIS OFFICE OR SUBMITTING DOCUMENTS FOR FILING, PLEASE REFER TO THE CORPORATION CONTROL NUMBER GIVEN ABOVE. PLEASE BE ADVISED THAT THIS DOCUMENT MUST ALSO BE FILED IN THE OFFICE OF THE REGISTER OF DEEDS IN THE COUNTY WHEREIN A CORPORATION HAS ITS PRINCIPAL OFFICE IF SUCH PRINCIPAL OFFICE IS IN TENNESSEE.

FOR: CHARTER - FOR PROFIT

ON DATE: 05/18/00

FROM:  
NEAL & HARWELL, PLC  
2000 FIRST UNION TWR  
150 FOURTH AVE NORTH  
NASHVILLE, TN 37219-0000

RECEIVED: FEES \$100.00 \$0.00  
TOTAL PAYMENT RECEIVED: \$100.00

RECEIPT NUMBER: 00002689983  
ACCOUNT NUMBER: 00311571



*Riley C. Darnell*

RILEY C. DARNELL  
SECRETARY OF STATE



August 18, 2005

Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

To Whom It May Concern:

As part of our application to Resell Telecommunication Services in Tennessee, Loretto Communication Services, Inc. will follow Loretto Telephone Company, Inc.'s Intralata Toll Dialing Parity Plan.

A copy of Loretto Telephone Company, Inc.'s Intralata Toll Dialing Parity Plan is attached.

If more information is needed to fulfill this requirement, please call A. J. Passarella at (931) 853-4351.

Sincerely,

A handwritten signature in cursive script that reads 'Louise Brown'.

Louise Brown,  
President

**Intralata Toll Dialing Parity  
Plan**

FINA  
IMPLEMENT  
PLAN

ORIGINAL  
PLAN

**Loretto Telephone Company, Inc.**

April 22, 1999

## I. Purpose

Loretto Telephone Company, Inc. (LTC) has described herein the process for implementing Intralata Toll Dialing Parity in the LTC exchanges located in the state of Tennessee in LTC's LATA (Plan). The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice routing their intraLATA toll calls.

## II. IntraLATA Environment

LTC customers in Tennessee in the LTC LATA can currently dial eleven digits to complete intraLATA toll calls. The scheduled date for implementation of toll dialing parity should not change this dialing pattern. After upgrading switch technology and software configurations, eleven-digit dialed numbers that are intraLATA toll calls should be prefixed with the area code before being transmitted to the carrier.

## III. Implementation Schedule

LTC will offer dialing parity for intraLATA toll in all of its Tennessee exchanges on July 22, 1999. Attachment A is a specific listing of all exchanges on record for the state of Tennessee.

\* See Attachment "B" for timeline.



#### **IV. Carrier Selection Procedures**

LTC will implement the full 2-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier, including their existing local exchange company (when it offers long distance service), for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

LTC employees who communicate with the public, accept customer orders, and serve in customer service will be trained to explain the process to customer's for making PIC changes for intralata toll calls. Business Office personnel will be prepared to make changes in customer records based upon requests from customer or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers. A list of available carriers will be provided to existing customers, if they request.

##### *Existing Customers*

On the date in which intraLATA toll presubscription is implemented in Tennessee, customers may presubscribe to telecommunications carriers offering intraLATA toll service in their exchange. Customers will remain with BellSouth Telecommunications until they affirmatively choose an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers directly to LTC, as their local exchange service provider, through the local Business Office or indirectly through their selected carriers.

Customers will be assessed a cost-based PIC change charge per LTC's tariff for changing their intraLATA carrier. When customers request a change in their interLATA and intraLATA carrier during one contact with the Business Office and choose the same carrier for both jurisdictions only one charge will be assessed. When customers request a change in their interLATA and intraLATA carriers during one contact with the Business Office and choose different carriers for each jurisdiction, two charges will be assessed.

For a waiver period of 90 days from implementation, customers will not be assessed an intraLATA PIC change charge for their initial intraLATA toll carrier choice. During the 90-day waiver period, a charge of one-half of the interLATA PIC change charge will be assessed when the intraLATA and interLATA carriers are changed to the same carrier during one contact with the Business Office. Only the interLATA charge will be assessed when the intraLATA and interLATA carriers are changed to different carriers during one contact with the Business Office during the waiver period.

A charge will be established for "slamming" or unauthorized PIC changes submitted by carrier for end-user customers. LTC will be subject to the rules related to slamming as indicated in Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2)-(6). [Section (1) defines the manner in which IXCs should confirm PIC change information prior to submitting the information to LECs. Because LTC is a LEC, the communication of information in the manner defined would not be applicable.

#### *New Installation Customers*

Customers who contact LTC requesting new telephone exchange service will be provided a list of telecommunications carriers available to provide interLATA toll service. Upon implementation of intraLATA toll presubscription, the customer will be provided a second list of carriers that provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented in a competitively neutral manner. Customers who do not make a positive choice for an intraLATA toll carrier will be identified within LTC's system as a "no-PIC" and will not be automatically defaulted to a carrier. Customers identified as "no-PIC" within LTC's systems will be required to dial 1010XXX to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

#### V. Customer Education/Notification

Customers will receive information explaining their opportunity to select an intraLATA carrier a minimum of 30 days in advance of the offering of intraLATA toll dialing parity via a bill message. In addition, during the 30 days following implementation of intraLATA Dialing Parity, customers will receive a bill insert also explaining their opportunity to select an intraLATA carrier. LTC anticipates that promotional strategies by carriers will contribute to customer awareness of intraLATA toll dialing parity. Customer telephone directories will be up-dated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier.  
(See Attachment "C" for Sample Copy)

#### VI. Carrier Notification

Current interexchange carriers will be notified of LTC's intraLATA toll dialing parity implementation via letter approximately 90 days in advance of the proposed implementation date. Carriers should provide a list of exchanges in which they plan to offer intraLATA toll service at least 60 days in advance of LTC's implementation date. LTC needs notification in advance to include the carrier on the list of participating carriers in each LTC exchange. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying LTC.

LTC will provide subscriber listing information to carriers in "readily accessible" tape or electronic formats in a timely manner as requested through the processes that currently exist for the interLATA market. The process includes subscriber listing updates to carriers for new customers who choose that carrier or for existing customers of a carrier who revise their subscriber listing information. In addition, carriers can obtain complete subscriber listings in several formats. The provision of this information is in compliance with FCC Order No. 96-333, Paragraph 389.

## **VII. Access to Operator Services and Directory Assistance**

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA carrier. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" in LTC's territory for accessing the local exchange Directory Assistance and customers dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

The local and interLATA Operator Services and Directory Assistance may be branded by the local and interLATA carriers, as appropriate, based on the dialing pattern of the end user. Since no unique intraLATA dialing pattern currently exists in the industry, LTC is not capable of identifying intraLATA calls to LTC's local or the IXC's interLATA operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 51-217(d).

## **VIII. Cost Recovery**

Loretto Telephone Company will file for approval with the TRA, an Equal Access Impact Recovery Plan that will be developed and implemented in coordination with IntraLATA Pre-subscription by June 11, 1999.

## **IX. Rights Under S251(f)(2) of the Telecommunications Act of 1996**

The filing of this plan does not preclude Loretto Telephone Company Inc. from exercising any of its rights to Suspension or Modification under S251(f)(2) of The Telecommunications Act of 1996.

## **X. Compliance With Rules.**

Loretto Telephone Company, Inc. will comply with all rules of the FCC and the TRA.

## **Attachment A**

### **Loretto Telephone Company. Inc. IntraLATA Toll Dialing Parity Exchanges**

Ethridge	931.829.xxxx
Five Points	931.556.xxxx
Leoma	931.852.xxxx
Loretto	931.853.xxxx
St. Joseph	931.845.xxxx