

RECEIVED

BASS, BERRY & SIMS PLC  
*Attorneys at Law*

2007 SEP 11 PM 12:56

A PROFESSIONAL LIMITED LIABILITY COMPANY

T.R.A. DOCKET ROOM

**Ross Booher**  
PHONE: (615) 742-7764  
FAX: (615) 742-0450  
E-MAIL: rbooher@bassberry.com

315 Deaderick Street, Suite 2700  
Nashville, Tennessee 37238-3001  
(615) 742-6200

September 11, 2007

**VIA HAND DELIVERY**

The Honorable Eddie Roberson  
Chairman  
c/o Sharla Dillon – Docket Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**Re: *Petition Of Global Connection, Inc. Of Tennessee For Designation As An  
Eligible Telecommunications Carrier***  
**Docket No. 07-00106**

Dear Chairman Roberson:

Enclosed please find an original and sixteen (16) copies of a Motion to Intervene in Opposition to the filing by Global Connection Inc. of Tennessee ("Global") for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Federal High Cost Universal Service Funding in the State of Tennessee. This motion is filed on behalf of Ardmore Telephone Company, CenturyTel of Adamsville, CenturyTel of Claiborne, Inc., CenturyTel of Ooltewah-Collegedale, Inc., Concord Telephone Exchange, Crockett Telephone Company, Inc., Humphreys County Telephone Company, Loretto Telephone Company, Inc., Millington Telephone Company, Peoples Telephone Company, Inc., Tellico Telephone Company, Tennessee Telephone Company, United Telephone Company, and West Tennessee Telephone Company, Inc. (collectively referred to hereafter as the "Coalition").

I request you please return three copies of this document, which I would appreciate your stamping as "filed," and returning to me by way of our courier.

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

Sincerely,



Ross Booher

RB/cw  
Enclosures

Chairman Eddie Roberson  
September 11, 2007  
Page 2

Enclosures

Cc: Hon. Sara Kyle  
Hon. Ron Jones  
Hon. Pat Miller  
Houssam Abdallah, President of Global Connection Inc. of America

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

**IN RE: PETITION OF GLOBAL CONNECTION     )  
INC. OF TENNESSEE FOR DESIGNATION AS AN     )  
ELIGIBLE TELECOMMUNICATIONS CARRIER     )**     **Docket No. 07-00106**

**MOTION TO INTERVENE IN OPPOSITION AND FOR A MORATORIUM ON  
DESIGNATION OF NEW ELIGIBLE TELECOMMUNICATIONS CARRIERS  
IN TENNESSEE**

Ardmore Telephone Company, CenturyTel of Adamsville, CenturyTel of Claiborne, Inc., CenturyTel of Ooltewah-Collegedale, Inc., Concord Telephone Exchange, Crockett Telephone Company, Inc., Humphreys County Telephone Company, Loretto Telephone Company, Inc., Millington Telephone Company, Peoples Telephone Company, Inc., Tellico Telephone Company, Tennessee Telephone Company, United Telephone Company, and West Tennessee Telephone Company, Inc. (collectively referred to hereafter as the “Coalition”) submit this Motion to Intervene in Opposition to the filing by Global Connection Inc. of Tennessee (“Global”) for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Federal High Cost Universal Service Funding in the State of Tennessee (“Petition”). The Coalition further moves for a moratorium on granting new Eligible Telecommunications Carriers (ETCs) for the purpose of receiving federal high cost universal service funding (“FUSF”) in Tennessee pending: (i) a decision by the Federal Communications Commission (“FCC”) on the recent recommendation by the Federal - State Joint Board on Universal Service (“Joint Board”) for an emergency cap on the amount of high-cost support that competitive eligible telecommunication carriers (“CETCs”) may receive<sup>1</sup>; (ii) implementation of the Tennessee Regulatory Authority’s

---

<sup>1</sup> See *In the Matter of High-Cost Universal Service Support Federal-State Joint Board on Universal Service*, Recommended Decision, Adopted April 26, 2007, Released May 1, 2007, WC Docket No. 05-337, CC Docket No. 96-45. A copy of the Recommended Decision is attached hereto as Exhibit 1.

rulemaking regarding ETC designation criteria (Docket No. 05-00284); and (iii) clarification of Global's Petition as to which specific areas of Tennessee it seeks ETC designation.

Global's Petition affects the Coalition's interests. First, while the Petition is internally inconsistent, it appears that Global intends for the Petition to cover all or part of the Coalition's local service area. Global's Petition initially states that Global seeks designation as an ETC for "the wire centers of BellSouth," yet Exhibit A to Global's Petition indicates that Global seeks ETC designation for "BellSouth," "Verizon," and "Sprint" exchanges. *See* Petition at 1-3 and Exhibit A. However, Global's Petition also states that Global seeks designation as an ETC "throughout [Global's] licensed service area," that such designation would affect "rural areas of the State" and that Global meets the elements required for a carrier that seeks ETC designation in an area served by a "rural telephone company." *Id.*<sup>2</sup> If Global is seeking CETC designation in rural parts of the State or in areas currently served by rural telephone companies, then the Coalition is directly affected by the Petition.

Second, regardless of the exchanges for which Global seeks CETC status, the Coalition would be affected by Global's designation as a CETC due to the impact such designation would have on an already strained Federal Universal Service Fund ("FUSF"). The TRA should take note of the Recommended Decision issued by the Joint Board<sup>3</sup> which recommends, *inter alia*, that the Federal Communications Commission ("FCC") take immediate action to rein in the explosive growth in FUSF disbursements. Specifically, the Joint Board has recommended an interim, emergency cap on the amount of high-cost support that competitive eligible telecommunications carriers (CETCs) may receive for each state, based on the average level of CETC support

---

<sup>2</sup> The Coalition is left to guess as to exactly what is being requested by the Petitioner. Indeed, the Petition contains no information about existing or future service in the state. Accordingly, the Coalition objects to the Petition on the basis that it fails to provide the basic information necessary to inform third parties of the nature and scope of the Petition.

<sup>3</sup> *See* Note 1, *infra*.

distributed in that state in 2006. The Coalition believes the issues raised by this application are inextricably tied to the decisions to be made by the FCC in response to the Recommended Decision of the Joint Board and that it is in the public interest to defer consideration of this application until such time as the FCC issues its decision regarding the Joint Board recommendation.

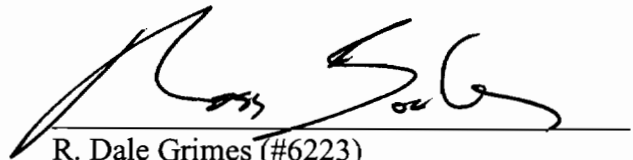
As the TRA is aware, on a national level, CETC Universal Service support payments have been growing at an alarming rate of one-hundred percent (100%) per year since 2002. At the same time, Universal Service funding received by traditional landline phone companies like Companies have been capped for more than ten (10) years. It is in the public interest for TRA to make sure the burden on Tennessee customers does not increase while the FCC considers the Joint Board recommendation to adopt an interim cap on FUSF support. Under the Joint Board recommendation, FUSF money will continue to flow and no current eligible telecommunications carrier will lose support or be harmed.

In addition, the Coalition also submits that the TRA should suspend the designation of any new ETC's pending the Tennessee Attorney General's review and implementation of the TRA's proposed Regulations for Eligible Telecommunications Carriers (ETC) as proposed in TRA Docket 05-00284. These proposed requirements establish the designation criteria, including the initial ETC designation, for the purpose of receiving federal universal service support. To grant new ETC designations prior to the final approval of the TRA's pending ETC requirements is counter to the TRA's initiative in Docket 05-00284.

For all of the reasons set forth above, the Coalition respectfully moves to intervene in opposition to Global's Petition and moves the TRA to implement a moratorium on pending and future CETC applications filed at the TRA for a one-year time period, or at least until action is

taken by the FCC on the Joint Board recommendation (or a long term USF solution is adopted by the FCC), until the TRA's ETC designation criteria proposed in docket number 05-00284 are finally approved and implemented and until Global specifies in which areas of Tennessee it seeks ETC designation. A moratorium will provide the TRA with time to address the issues raised in the current proceeding and will help stabilize the impact of FUSF on Tennessee telecommunications customers.

Respectfully submitted,



R. Dale Grimes (#6223)  
Ross I. Booher (#19304)  
BASS, BERRY & SIMS, PLC  
AmSouth Center  
315 Deaderick Street, Suite 2700  
Nashville, Tennessee 37238-3001  
(615) 742-6200

*Attorneys for the Coalition*

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing *Motion to Intervene in Opposition* on those indicate below by placing a copy of same in the United States Mail, properly addressed and postage prepaid on this the 11<sup>th</sup> day of September, 2007.

Houssam Abdallah, President  
Global Connection Inc. of America  
3957 Pleasantdale Road  
Atlanta, Georgia 30340



Ross Booher