

**VCI
Company**

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T.R.A. DOCKET ROOM

Via U.S. Mail

August 1, 2007

07-00177

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 32743-0505
Attn: Lewis DeBoard

RE: VCI Company – 2008 ETC Self-Certification

Dear Mr. DeBoard:

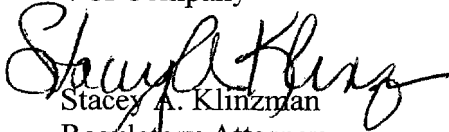
As requested in the Authority's July 25, 2007 letter, enclosed are an original and thirteen (13) copies of VCI Company's Self-Certification for eligibility to receive Universal Service fund reimbursement for the Fiscal Year 2008.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me.

Sincerely,

VCI Company


Stacey A. Klinzman
Regulatory Attorney

**VCI COMPANY
CERTIFICATION OF ELIGIBILITY TO RECEIVE
UNIVERSAL SERVICE FUNDS FOR FISCAL YEAR 2007
DOCKET NO. 07-00177**

Pursuant to Federal Communications Commission rules and orders, and the Tennessee Regulatory Authority's ("Authority") letter dated July 25, 2007, VCI Company ("VCI") hereby submits its annual certification of eligibility to receive universal service funds for fiscal year 2008. With this filing, VCI Company certifies that it will continue to meet all applicable FCC requirements for designation as an ETC set forth in the FCC's March 17, 2005 Order.¹ Each of these requirements is addressed below:

1. **Commitment to provide service throughout its proposed designated service area to all customers making a reasonable request for service.**

VCI commits to continue providing service throughout its proposed designated service area to all customers making a reasonable request for service.

2. **Commitment to provide service on a timely basis within the applicant's service area within and outside of existing network coverage.**

VCI commits to continue to service on a timely basis within its designated service area. As the Company does not own, operate or manage a network, whether the Company is able to serve a particular subscriber is dependent on where AT&T Tennessee's network is located or where AT&T Tennessee builds out its network. Service outside of AT&T's Tennessee's existing network coverage, in VCI's Designated Area, cannot be provided at reasonable cost by VCI.

3. **Five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed designated service area.**

VCI provides Lifeline and Link-Up services in the service area where AT&T Tennessee is a certificated local exchange carrier. AT&T Tennessee is not a rural carrier. VCI does not request reimbursement from any state or federal high cost fund. VCI was not required to submit a 5-year plan indicating how high-cost funding will be used as part of the ETC designation process, and should not be required to provide any such plan in the future.

¹ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, 20 FCC Rcd 6371 ¶¶ 20-35 (FCC 2005).

In Addition, the FCC has determined that Lifeline providers utilize Federal universal service support for the purpose it was intended when the carrier reduces the price of access to telecommunications services for the eligible customer by the amount of that support.² VCI will continue to pass through all applicable state and Federal service discounts to its end-user customers, thus reducing the price of access to telecommunications services for the Lifeline and Link-Up eligible customer.

VCI invests in Tennessee's telecommunications infrastructure through payment of rates and charges to AT&T Tennessee for services purchased or leased from AT&T Tennessee, which rates and charges include costs for maintenance and upgrade of AT&T Tennessee's facilities.

4. **Demonstration of ability to remain functional in emergency situations, including a demonstration that the company has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.**

VCI's ability to remain functional in an emergency situation is dependent on that of AT&T Tennessee, its underlying network based carrier, including the supply of a reasonable amount of back-up power to ensure functionality without an external power source, ability to reroute traffic around damaged facilities, and capability of managing traffic spikes resulting from emergency situations.

5. **Demonstration that VCI will satisfy applicable consumer protection and service quality standards.**

VCI will continue to comply with all applicable consumer protection and service quality standards in Tennessee.

² *In the Matter of Federal-State Board on Universal Service, Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. Sec. 214(e)(1)(A) and 47 C.F.R. Sec. 54.201(i)*, ¶ 26 (CC Docket No. 96-45, rel. Sept. 8, 2005).

6. Demonstration that VCI offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

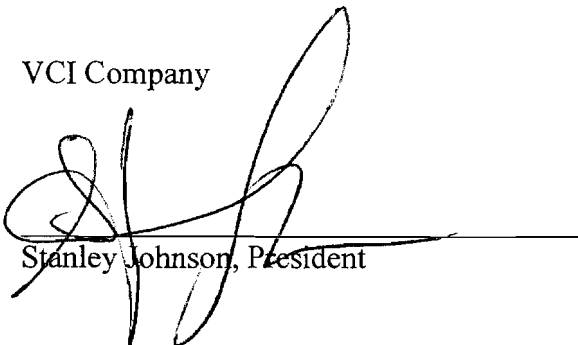
As set forth in VCI's tariff, VCI offers and will continue to offer Tennessee consumers a local usage plan permitting the Customer to make an unlimited number of local calls within the customer's local calling area for a flat monthly fee, as does AT&T Tennessee. (See BellSouth Telecommunications, Inc. Tennessee General Subscriber Services Tariff, Section A3).

7. Certification that VCI acknowledges that the Tennessee Regulatory Authority may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

VCI certifies that it acknowledges that the Authority may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access with the service area.

Submitted this 15th day of August, 2007

VCI Company



Stanley Johnson, President

AFFIDAVIT

STATE OF WASHINGTON)
)
COUNTY OF PIERCE) SS: Tacoma

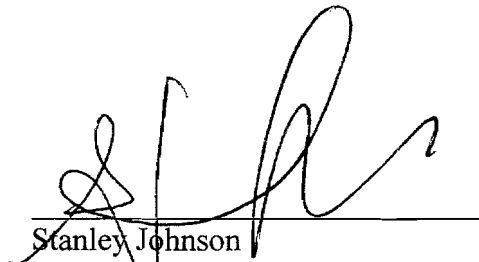
Stanley Johnson, first being duly sworn and deposed, states the following:

I am President of VCI Company;

I am authorized to make this Affidavit on behalf of the company;


I have read the contents of VCI Company's Certification of Eligibility to Receive Universal Service Funds for Fiscal Year 2008 and know the contents thereof; and

The statements made therein are true to the best of my knowledge, information and belief, and as to those matters that are therein stated on information or belief, I believe them to be true.



Stanley Johnson
Telephone: (253) 973-2476
Facsimile: (253) 475-6328
Electronic mail: stanj@vcicompany.com

Subscribed and sworn to before me, Sue P. Willett, a Notary Public in and for the State of Washington, residing at Pierce County, this 15th day of August, 2007.



Sue P. Willett

My Commission Expires: 7-29-2011

