

J. Russell Farrar
William N. Bates
Kristin Ellis Berexa
Teresa Reall Ricks
Mary Byrd Ferrara*
Robyn Beale Williams
Jennifer Orr Locklin
Keith F. Blue
Heather C. Stewart
Derrick A. Free
David M. Hannah
Deanna L. Cooper
Beth L. Frazer
Jeffrey M. Cranford
John C. Lyell

LAW OFFICES
Farrar
&
Bates, L.L.P.

Phone 615.254.3060
Fax 615.254.9835

211 Seventh Avenue North
Suite 500
Nashville, TN 37219
fblaw@farrar-bates.com

Of Counsel
H. LaDon Baltimore

*Also licensed in KY

November 30, 2007

FILED ELECTRONICALLY IN DOCKET OFFICE ON 12/03/07

Ms. Sharla Dillon, Docket Room Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket 07-00255; Petition of Ben Lomand Rural Telephone Cooperative, Inc.;
Ben Lomand Communications, Inc.; Volunteer First Services, Inc.; Ben Lomand
Communications, LLC; and Volunteer First Services, LLC For Approval of an
Internal Corporate Reorganization

Dear Ms. Dillon:

Attached is the Response to Data Request No. 1 (original and 4 copies).

Exhibit A is CONFIDENTIAL AND PROPRIETARY.

In Response 5, Petitioners move/request that the 30 day pre-notice for customer
notification letter be waived and that such letter be included in the customer's bill.

Sincerely,



H. LaDon Baltimore
Counsel for Petitioners

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF BEN LOMAND)	
RURAL TELEPHONE COOPERATIVE,)	
INC.; BEN LOMAND)	
COMMUNICATIONS, INC.;)	
VOLUNTEER FIRST SERVICES,)	DOCKET NO. 07-00255
INC.; and VOLUNTEER FIRST)	
SERVICES, LLC FOR APPROVAL OF)	
AN INTERNAL CORPORATE)	
REORGANIZATION AND TRANSFER)	
OF CERTIFICATES OF)	
CONVENIENCE & NECESSITY)	

**RESPONSES OF BEN LOMAND RURAL TELEPHONE
COOPERATIVE, INC.; BEN LOMAND COMMUNICATIONS,
INC.; VOLUNTEER FIRST SERVICES, INC.; BEN LOMAND
COMMUNICATIONS, LLC, and VOLUNTEER FIRST SERVICES,
LLC TO TRA DATA REQUEST NO. 1**

Ben Lomand Rural Telephone Cooperative, Inc. ("Ben Lomand"), Ben Lomand Communications, Inc. ("BLC Inc.") Volunteer First Services, Inc., ("Vol First Inc."), Ben Lomand Communications, LLC ("BLC LLC") and Volunteer First Services, LLC ("Vol First LLC") by and through their undersigned counsel, files these responses to Tennessee Regulatory Authority ("TRA") Data Request No. 1 dated November 27, 2007.

1. Have the Petitioners filed similar applications or notices in other states? If so, provide a listing of states and action taken.

RESPONSE: No.

2. Have the Petitioners filed a similar petition with the FCC? If so, list any action taken and the associated docket number. If a schedule to complete the review of your petition has been established by the FCC, provide such with your response.

RESPONSE: No. Petitioners are in compliance with FCC Rules.

3. Provide the number of customers that Ben Lomand Rural Telephone Cooperative, Inc., Ben Lomand Communications, Inc., and Volunteer First Services, Inc. currently have in Tennessee.

RESPONSE: Attached hereto is **Confidential and Proprietary** Exhibit A which states the number of customers.

4. Provide a signed verification from the Petitioners stating that the information contained in the *Petition* is true and correct to their best knowledge, information and belief.

RESPONSE: Attached hereto as Exhibit B is the Verification of Levoy Knowles.

5. Explain how the Petitioners will comply with TRA Rule 1220-4-2-.56(2)(d) concerning the transfers of customer base with respect to the transaction described in the *Petition*. In your response, provide a copy of the customer notification letter.

RESPONSE: Attached hereto are Exhibits C and D, the customer notification letters of Ben Lomand Communications, Inc. and Volunteer First Services, Inc., respectively.

The Petitioners hereby request the Authority to waive the thirty day pre-notice due to time constraints and the pro forma nature of the customer transfer. As stated in the *Petition*, due to tax reasons it is imperative that the restructure be completed before January 1, 2008. No hardship will be caused to the customers because it is not a transfer to a new carrier but merely restructured and renamed Ben Lomand Communications, Inc. and Volunteer First Services, Inc. Petitioners also request that such customer

notification letter be inserted in the first bill to customers after the reorganization is approved and completed. Such mailing will meet the requirements of TRA 1220-4-2-.56(2)(d)(2) because the logo of the current provider will be displayed on the letterhead of the notice and on the exterior envelope of the invoice containing the customer notification letter. Such mailing will save costs and time which will benefit the customers of the companies undergoing the name change. Petitioners submit that such reasons for the thirty day waiver and separate mailing are good cause for waiver under TRA Rule 1220-4-2-.56 (2)(d)(2-4). Furthermore, TRA Rule 1220-1-1-.05(1) provides for waiver of any rules of the Authority. Petitioners ask the Authority to consider the request in this response to be a Motion for Waiver of such rules.

6. Provide a \$20,000 corporate surety bond, irrevocable letter of credit or sufficient documentation to demonstrate compliance with T.C.A. § 65-4-125 for Ben Lomand Communications, LLC; and Volunteer First Services, LLC.


RESPONSE: Attached hereto as Exhibit E is the application and invoice for the surety bond for Volunteer First Services, LLC. The surety bond will be filed upon receipt, which should be during the week of December 3. Vol First, LLC will own and operate equipment facilities in Tennessee with the value of more than five million dollars (\$5,000,000) within the next six to twelve months and thus will meet the exemption requirements of T.C.A. § 65-4-125(j).

Ben Lomand Communications, LLC meets the exemption requirements of T.C.A. § 65-4-125(j) because BLC LLC, upon transfer of assets from BLC Inc., will own and operate equipment facilities in Tennessee with a value of more than five million dollars (\$5,000,000).

7. Will Volunteer First Services, Inc. retain certification to provide telecommunications service after completion of the transaction described in the *Petition*? If not, please explain the basis for requesting approval from the TRA for a name change for a non-certificated entity.

RESPONSE: Volunteer First Services, Inc. will not retain certification to provide telecommunications services after completion of the transactions. Volunteer First Services, LLC will have certification to provide such services after completion of the transactions. Request for approval of the name change was requested out of an abundance of caution. If the TRA is of the opinion that approval is not necessary, then such request for approval of name change is withdrawn. Counsel for Petitioner agrees with the TRA that approval of the name change of Volunteer First Services, Inc. to Ben Lomand Holdings, Inc. is not necessary since Vol First Services, Inc. will not be a certificated telecommunications service provider after the transactions are complete. Therefore, Volunteer First Services, Inc. will be a non-certificated entity when the name change occurs.

Respectfully submitted,



H. LaDon Baltimore, BPR #003836
FARRAR & BATES, L.L.P.
211 Seventh Avenue North, Suite 500
Nashville, TN 37219
(615) 254-3060
(615) 254-9835 FAX
Attorney for Petitioners

EXHIBIT A

CONFIDENTIAL & PROPRIETARY

(PROVIDED IN SEALED ENVELOPE)

VERIFICATION

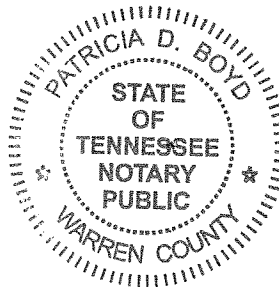
I, Levoy Knowles, Chief Executive Officer of Ben Lomand Rural Telephone Cooperative, Inc. am authorized to represent it and its subsidiaries, and to make this verification on their behalf. The statements in the petition filed in this matter relating to Ben Lomand Rural Telephone Cooperative, Inc. and its subsidiaries, except as otherwise specifically attributed, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Levoy Knowles

Subscribed and sworn to before me this 29th day of
November, 2007.

Patricia D. Boyd
Notary Public



My Commission expires: 8-25-09

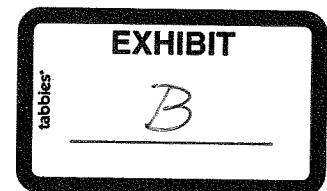


EXHIBIT C

[Insert company logo or name]

[Insert date]

Dear Valued Customer:

Ben Lomand Communications, Inc. has changed its name to Ben Lomand Communications, LLC to reflect a corporate reorganization. As an existing customer, the only change you will see is a change in the name of Ben Lomand Communications, Inc. to Ben Lomand Communications, LLC.

As a customer of Ben Lomand Communications, LLC you will continue to receive telecommunications services with the same rates, features, terms and conditions as you currently enjoy. Under Tennessee law, we are required to give you thirty days notice if there will be any rate increases within ninety days of the name change. At this time, we do not anticipate any such changes.

There is no action required on your part. You will automatically become a customer of Ben Lomand Communications, LLC. You may, of course, choose another provider for your telephone service, subject to any restrictions in your service arrangement with Ben Lomand Communications, Inc. Any preferred carrier freezes in place will automatically be lifted, and will be reinstated at no charge.

We look forward to serving you and appreciate your continued business. In the meantime, if you have specific questions about this notice, please contact us at: (931) 507-0581 or (931) 837-0581

Sincerely,

Ben Lomand Communications, Inc.
Ben Lomand Communications, LLC

EXHIBIT D

[Insert company logo or name]

[Insert date]

Dear Valued Customer:

Volunteer First Services, Inc. has changed its name to Volunteer First Services, LLC to reflect a corporate reorganization. As an existing customer, the only change you will see is a change in the name of Volunteer First Services, Inc. to Volunteer First Services, LLC.

As a customer of Volunteer First Services, LLC you will continue to receive telecommunications services with the same rates, features, terms and conditions as you currently enjoy. Under Tennessee law, we are required to give you thirty days notice if there will be any rate increases within ninety days of the name change. At this time, we do not anticipate any such changes.

There is no action required on your part. You will automatically become a customer of Volunteer First Services, LLC. You may, of course, choose another provider for your telephone service, subject to any restrictions in your service arrangement with Volunteer First Services, Inc. Any preferred carrier freezes in place will automatically be lifted, and will be reinstated at no charge.

We look forward to serving you and appreciate your continued business. In the meantime, if you have specific questions about this notice, please contact us at: (931) 484-5097.

Sincerely,

Volunteer First Services, Inc.
Volunteer First Services, LLC

Southern Insurance Group
419 North Chancery Street
McMinnville, Tennessee 37110
(931) 473-9641

November 30, 2007

Volunteer First Services, LLC
c/o Ben Lomand Rural Telephone Cooperative, Inc.
311 North Chancery Street
McMinnville, TN 37110

Attn: David Vaughn

Re: Tennessee Telecommunications Service Provider's Surety Bond
RLI Insurance Company

David:

As we discussed on the phone, RLI Senior Surety Underwriter, Ken Floyd, has emailed me that RLI can service the surety bond with indemnity of Volunteer First Services, LLC and Ben Lomand Rural Telephone Cooperative, Inc. Upon receipt of proper indemnity, RLI will issue the bond.

I have enclosed the following items:

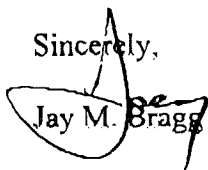
- Completed RLI Form 01 bond application.
- Information on RLI Insurance Company.
- Invoice for the \$400 bond annual premium.

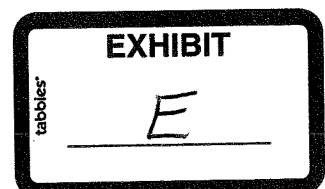
Please have Levoy sign the enclosed application (by the red X) as a managing member of Volunteer First Services, LLC and as a corporate officer of Ben Lomand Rural Telephone Cooperative, Inc. After his signature, Levoy is to print in his own handwriting his respective corporate title.

Phone me when the application is ready to pick-up at the drive thru window. Should you have any questions, just call.

I appreciate the opportunity to be of continuing service.

Sincerely,


Jay M. Bragg





Volunteer First Services, LLC
 Ben Lomand Rural Telephone Cooperative, Inc.
 311 North Chancery Street
 McMinnville, TN 37110

Customer	Ben Lomand Rural Telephone Cooperative, Inc.
	2251
Date	11/30/2007
Customer Service	Jay Bragg Virginia Nunley
Page	1 of 1

Payment Information	
Invoice Summary	400.00
Payment Amount	
Payment for:	Invoice#72884
TBD	

Customer: Ben Lomand Rural Telephone Cooperative, Inc.

Invoice	Effective	Transaction	Description	Amount
72884	12/03/2006	New business	Policy #TBD 12/03/2006-12/03/2007 RLI Surety Service Provider Surety Bond - New business Volunteer First Services, LLC	400.00
				APPROVED TO PAY
				BY: <u>CLK</u> DATE: <u>11/30/07</u> TITLE: <u>Chief Mgr</u>
				Total
				400.00

Southern Insurance Group, Inc.
 419 N. Chancery Street
 McMinnville, TN 37110-2049

(931)473-9641

Date

11/30/2007