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June 25, 2008

**VIA ELECTRONIC FILING**  
**AND OVERNIGHT MAIL**

Honorable Jones, Chairman  
Attn: Sharla Dillon, Dockets  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-9021  
(615) 741-3939

filed electronically in docket office on 07/01/08

Re: dPi Teleconnect, LLC  
ETC Designation

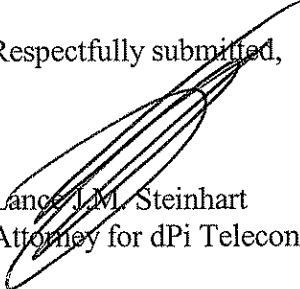
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of dPi Teleconnect, LLC' Application for a Certificate as an Eligible Telecommunications Carrier. I have also enclosed a check in the amount of \$25.00 payable to the "Tennessee Regulatory Authority" for the filing fee and a CD-ROM containing an electronic copy of this filing.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for dPi Teleconnect, LLC

Enclosures

cc: David Dorwart

89886

dPI TELECONNECT, LLC  
2997 LBJ FREEWAY, SUITE 225  
DALLAS, TX 75234  
(972) 488-5500

BANK OF TEXAS N.A.  
32-1432-1110

6/26/2008

\$ \*\*25.00

PAY TO THE ORDER OF TENNESSEE REGULATORY AUTHORITY. DOLLARS

Twenty-Five and 00/100

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

MEMO DPI Teleconnect, LLC-ETC File

⑈089886⑈ ⑆11014325⑆ ⑈8090564509⑈

*David B. Stewart*  
NP

**BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSON**

<b>APPLICATION OF</b>	)	
<b>DPI TELECONNECT, LLC</b>	)	
<b>FOR CERTIFICATION AS AN ELIGIBLE</b>	)	<b>DOCKET NO.</b>
<b>TELECOMMUNICATIONS CARRIER</b>	)	

**APPLICATION FOR CERTIFICATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

dPi Teleconnect, LLC ("dPi" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),<sup>2</sup> and the rules and regulations of the Tennessee Public Service Commission (the "Commission"), hereby applies to the Commission for certification as an Eligible Telecommunications Carrier ("ETC") throughout the BellSouth Telecommunications, Inc. d/b/a AT&T of Tennessee service territories (the "Designated Service Area") for the purpose of receiving federal universal service support. A list of each wire center which the Applicant is requesting ETC status in the State of Tennessee is attached hereto as Exhibit 1. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, dPi satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of dPi as an ETC in the Designated Service Area will serve the public interest. Accordingly, dPi respectfully requests that the Commission grant this Application.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

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## **I. Background**

1. dPi is a Delaware limited liability company<sup>3</sup>. A copy of the Applicant's Articles of Organization is on file with the Commission and incorporated herein by reference. The Applicant was granted a Certificate of Convenience and Necessity ("CCN") to Provide Competing Facilities-Based Local Exchange Telecommunications Services Within the State of Tennessee in Case No. 08-00025 per Order issued on June 16, 2008. Applicant was previously issued a CCN to Provide operator services and/or resell local and interexchange telecommunications service in Tennessee in Docket No. 98-00621 per order issued on March 2, 1999. The principal office of the Applicant is located at 2997 LBJ Freeway, Suite 225, Dallas, TX 75234. The telephone number of the Applicant is (972) 488-5500. The Applicant provides local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents

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<sup>3</sup> dPi was organized in the State of Delaware on January 15, 1999.

obtained through agreements with AT&T of Tennessee that allows end-to-end switching delivery of calls.

2. As set forth in Section 214(e)(2) of the Act, the Commission “shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State commission.”<sup>4</sup> Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.<sup>5</sup>

3. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- (A) offer the services that are supported by Federal universal support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using the media of general distribution.<sup>6</sup>

## **II. dPi Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area**

4. dPi is a common carrier as that term is defined in the Act.<sup>7</sup> The Applicant provides competitive local telecommunications services in the Designated Service Area pursuant to Case Nos. 08-00025 and 98-00621 referenced above.

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<sup>4</sup> 47 U.S.C. § 214(e)(2); *see* 47 C.F.R. § 54.201(b) (FCC Rules citing the Act’s requirements).

<sup>5</sup> 47 U.S.C. § 214(e)(1).

<sup>6</sup> *Id.*

<sup>7</sup> *See* 47 U.S.C. § 153(10) (“the term ‘common carrier’ or ‘carrier’ means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy . . .”).

5. dPi offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs, or the equivalents thereof. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.<sup>8</sup> Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

6. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated in the rules of the Federal Communications Commission ("FCC") at 47 C.F.R. § 54.101(a)(1)-(9). These services are:

- a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;
- c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;

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<sup>8</sup> Section 54.201(f) of the FCC's Rules states, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." 47 C.F.R. § 54.201(f). The term "facilities" under Section 54.201 is defined as "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part." 47 C.F.R. § 54.201(e). dPi's use of UNEs, including §251 loops, or equivalents thereof,

- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;
- e) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;

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commingled with § 271 elements provided pursuant to an agreement filed with the Commission pursuant to § 252, meets this definition of "facilities."

- g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- i) Toll limitation for qualifying low-income consumers.

7. Upon certification as an ETC, dPi will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services, as required by FCC Rules.<sup>9</sup> A copy of proposed tariff revisions is attached hereto as Exhibit 2.

8. dPi will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.<sup>10</sup>

### **III. Area for Which ETC Certification Is Requested**

12. dPi has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the state of Tennessee. dPi does not seek certification as an ETC in any areas served by rural telephone companies.

### **IV. Granting dPi's Application Will Serve the Public Interest**

13. Congress requires that the Commission grant competitive ETC applications in non-rural areas.<sup>11</sup> No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.<sup>12</sup> Thus, the Act provides that the Commission "shall" designate dPi as an ETC upon finding that the Applicant meets the nine-point list of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding, the designation of dPi as an ETC will serve the public interest.

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<sup>9</sup> See 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d)..

<sup>10</sup> See 47 C.F.R. §§ 54.201(d)(2).

<sup>11</sup> See 47 U.S.C. 214(e)(2).

<sup>12</sup> See *Id.*

14. A central purpose of the Telecommunications Act of 1996 was to “promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ... and encourage the rapid deployment of new telecommunications technologies.”<sup>13</sup> Designation of dPi as an ETC would further these goals. Granting ETC status to dPi would allow the Applicant to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to non-rural consumers in the Designated Service Area.

15. dPi will announce and advertise telecommunications services as an ETC where it provides service in its Designated Service Area in Tennessee and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Tennessee residents will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those opportunities by subscribing to dPi’s service.

16. dPi will provide universal service as an ETC in all of its Designated Service Area.

17. dPi is willing to accept carrier of last resort obligations throughout the universal service areas in which dPi is designated as an ETC by the Commission.

18. dPi is aware that it may seek USF funding only with respect to those customers that it serves through the use of its own facilities (including UNE-P or equivalent facilities).

19. dPi will provide equal access to long distance carriers, to the extent to which it is able to do so.

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<sup>13</sup> The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

20. Under FCC guidelines, an ETC Applicant must submit a 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. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because dPi seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, and is distributed on a per-customer basis and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

21. Applicant offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

22. Under FCC guidelines, an ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 CFR §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's ETC Order. Applicant in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

23. Under FCC guidelines, an ETC Applicant must demonstrate its ability to remain functional in emergency situations. 47 CFR §54.202(a)(2); FCC ETC Order at Para 25. Since Applicant is providing service to its customers through the use of ILEC leased facilities, this arrangement allows Applicant to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

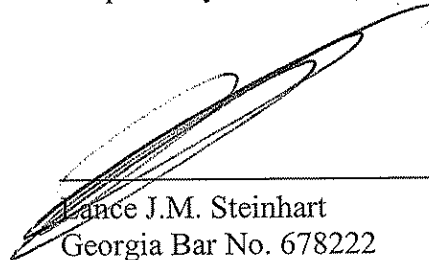
24. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service.

25. Applicant has been designated an ETC by the Alabama Public Service Commission, the Kansas Corporation Commission, the North Carolina Public Utilities Commission, the Texas Public Utility Commission. No state has denied any ETC petition filed by Applicant, nor have any such petitions been withdrawn. Applicant has petitions for ETC status pending in states of Arkansas, Florida, Georgia, Louisiana, Oklahoma and South Carolina.

**V. Relief Requested**

For the foregoing reasons, dPi respectfully requests that the Commission grant its application and designate the Applicant as an ETC for the Designated Service Area.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lance J.M. Steinhart", is written over a horizontal line.

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Attorney for dPi Teleconnect, LLC

**Exhibit 1**  
**Wire Centers**

## Exhibit E

Company	RateCenter	Switch
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORK RIDGE	MDBOKYMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ETOWAH	ETWHTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DECATUR	DCTRNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENTON	BNTNTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNHTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SURGOINSVL	SRVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SWEETWATER	SWTWTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL	MDVITNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SODDYDAISY	SDDSTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGCITY	SPCYTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COPPERBSIN	CRHLTNCBRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BULLS GAP	BLGPTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNNSDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITWELL	WHWLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNDTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SNEEDVILLE	SNVLTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ATHENS	ATHNTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAYTON	DYTNTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHARLESTON	CHTNTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JELICO	JLLCTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNNSDS1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNSED0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SO PITTSBG	SPBGTMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNMVDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNRODS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNRBDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNSMRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAFOLLETTE	LFLTNNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROGERSVL	RRVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JASPER	JSPRTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHATTNOOGA	CHTGTNBRDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GEORGETOWN	CLEVTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WATERTOWN	WTTWTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EAGLEVILLE	EAVLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNAARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PORTLAND	PTLDTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNCDRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNWMDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARTSVILLE	HTVLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGFLD	SPFDTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRIUNE	TRINTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNAPDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNMT84T
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GALLATIN	GALLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SMYRNA	SMYRTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEBANON	LBNNTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENBRIER	GNBRTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNINCG0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRSPLORLND	CRPLTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNBWDS0

BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNBHRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITEHOUSE	WHHSTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNBVDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ADMSCDARHL	ACHLTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNHHRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CARTHAGE	CRHTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DICKSON	DKSNTNMSTD0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PLEASANTVW	PSVWTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN	FKLNTNCCRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNMTDS3
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHARLOTTE	CHRLTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ASHLAND CY	ASCYTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN	FKLNTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FAIRVIEW	FRVWTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSNVL	HDVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNCHDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OLDHICKORY	OLHCTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GOODLETSVL	GDVLTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNMCDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNWCDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNMTDS1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURFREESBO	MRBOTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNSTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNODDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KINGSTNSPG	WHBLTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE	NSVLTNUNDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOLIVAR	BLVRTNMADS1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENFIELD	GNFDTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MICHIE	CRNTMSMADS2
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TIPTONVL	TPVLTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RIDGELY	RDGLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYERSBURG	DYBGTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCKENZIE	MCKNTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLETON	MDTNTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SO FULTON	FLTNKYMADS0
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BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HORNBEAK	HRNBTNMTRS5
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BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BIG SANDY	BGSNTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEWBERN	NWBRTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RIPLEY	RPLYTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARIS	PARSTNMADS1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SELMER	SLMRTNMTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GLEASON	GLSNTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOLIVAR	BLVRTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BELLS	BLLSTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYER	DYERTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MILAN	MILNTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENNING	HNNGTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KENTON	KNTNTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BROWNSVL	BWVLTNMADS1

[illegible]

MEDINA	MEDNTNMAADS0
GIBSON	GBSNTNMTRS0
HUMBOLDT	HMBLTNMAADS1
HALLS	HLLSTNMTRS5
TRENTON	TRTNTNMAADS0
UNION CITY	UNCYTNMAADS0
SAVANNAH	SVNHTNMTDS0
BETHEL SPG	BTSPTNMARS0
LEXINGTON	LXTNTNMAADS1
JACKSON	JCSNTNNSDS0
CEDARGROVE	HNTGTNMAADS0
JACKSON	JCSNTNMAADS0
HENDERSON	HNSNTNMTRS0
WESTSWEETW	SWTWTNMTRS0
BENTCREEK	HRFRTNMARS0
ROCKWOOD	RKWDTNMAADS0
LAKE CITY	LKCYTNMAADS0
OLIVER SPG	OLSPTNMARS0
GATLINBURG	GTBGTNMTDS0
MARYVILLE	TWNSTNMARS5
LOUDON	LODNTNMARS5
CLINTON	CLTNTNMAADS0
JEFFERSNCY	JFCYTNMAADS1
DANDRIDGE	DNRGTNMAADS0
NORRIS	NRRSTNMARS0
CHESTNUTHI	NWPTTNMTDS0
KNOXVILLE	KNVLTNMAADS0
KNOXVILLE	KNVLTNYHCG0
WHITE PINE	WHPITNMAADS0
KNOXVILLE	KNVLTNFCDS0
KINGSTON	KGTNTNMTDS0
KNOXVILLE	KNVLTNWHDS0
GREENBACK	GRNBTNMAARS5
HARRIMAN	HIMNTNMAADS0
SEVIERVL	SVVLTNMTDS0
KNOXVILLE	KNVLTNBEDS0
SOLWAY	OKRGTNMTDS0
MASCOT	MSCTTNMTDS0
KNOXVILLE	KNVLTNMAADS1
KNOXVILLE	MAVLTNMAADS0
LENOIRCITY	LNCYTNMAADS0
MAYNARDVL	MYVLTNMAARS0
BEAN STATN	MRTWTNMAADS0
MARYVILLE	FIVLTNMAARS5
WESTWHITEV	WHVLTNMTRS0
MEMPHIS	MMPHTNELBB0
MEMPHIS	MMPHTNFRDS0
SOMERVILLE	SOVLTNMTDS0
COVINGTON	CVTNTNMTDS1
MEMPHIS	MMPHTNCTDS0
MEMPHIS	MMPHTNMTDS0
MEMPHIS	MMPHTNMACG1

BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNMACG0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNMTCG0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNCKDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNHPRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	GTWSTNSWRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNGTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNWWCG0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNNOADS1
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNELDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COLLIERVL	CRVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ARLINGTON	ARTNTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MOSCOW	MSCWTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAGRANGE	GDJTTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNSLDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNBADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS	MMPHTNSTDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DOVER	DOVRTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HAMPSHIRE	HMPSTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WAVERLY	WVRLTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PALMYRA	PLMYTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEWISBURG	LWBGTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FREDONIA	FRDNTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SANGO	SANGTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTPLEASANT	MNPLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CUNNINGHAM	CNHMTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLANCHE	BLNCTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FAYETTEVL	FYVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TULLAHOMA	TLLHTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKTON	PLSKTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HUNTLAND	HNLDTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SO GUTHRIE	GTHRKYMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGHILL	SPHLTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYNNVILLE	LYVLTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SOOAKGROVE	OKGVKYESDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCEWEN	MCWNTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLIAMSPJ	WLPTTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SEWANEE	SEWNTNMWDS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PETERSBURG	PTBGTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYLES	LYLSTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SANTA FE	SNTFTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHELBYVL	SHVLTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MANCHESTER	MNCHTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTERVL	CNVLTNMARS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYNCHBURG	LYBGTNMTRS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	W VANLEER	VNLRTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAWRENCEBG	LRBGTNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOHENWALD	HHNWTNMARS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CUMBERLDCY	CMCYTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COLUMBIA	CLMATNMADS0
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NORMANDY	WRTRTNMTRS5
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLARKSVL	CLVLTNMADS0

BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL  
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL  
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL  
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL

FLINTVILLE  
SUMMERTOWN  
WINCHESTER  
CULLEOKA

FLVLTNMARS5  
SMTWTNMARS5  
WNCHTNMADS0  
CULKTNMARS5

**Exhibit 2**  
**Proposed Tariff Revisions**

(N)

3.7 Lifeline Program

A. General

- (i) The Lifeline program is designed to increase the availability of telecommunications services to low income subscribers by providing a credit to monthly recurring local service for qualifying residential subscribers. Basic terms and conditions are in compliance with the FCC's Order on Universal Service in CC Docket No. 97-157, which adopts the Federal-State Joint Board's recommendation in CC Docket No. 96-45, which complies with the Telecommunications Act of 1996. Specific terms and conditions are as prescribed by the South Carolina Public Service Commission and are as set forth in this tariff.
- (ii) Lifeline is supported by the federal universal service support mechanism.
- (iii) Federal baseline support of eight dollars and twenty-five cents (\$8.25) is available for each Lifeline service and is passed through to the subscriber. An additional three dollars and fifty cents (\$3.50) credit is provided by the Company. Supplemental federal support of one dollar and seventy-five cents (\$1.75), matching one half of the Company contribution, will also be passed along to the Lifeline subscriber. The total Lifeline credit available to an eligible customer in South Carolina is thirteen dollars and fifty cents (\$13.50). The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage.

B. Regulations

(i) General

- (a) Customers eligible under the Lifeline program are also eligible for connection assistance under the Link-Up program.
- (b) One low income credit is available per household and is applicable to the primary residential connection only. The named subscriber must be a current recipient of any of the low income assistance programs identified in Section B(ii)(a) following.
- (c) A Lifeline customer may subscribe to any local service offering available to other residential customers. Since the Lifeline credit is applicable to the primary residential connection only, it may not be applied to multiple lines in a package for local service.
- (d) Toll blocking, if elected, will be provided at no charge to the Lifeline subscriber.
- (e) No deposit will be required of a Lifeline customer who subscribes to toll blocking. If a Lifeline customer removes toll blocking prior to establishing an acceptable credit history, a deposit may be required. When applicable, advance payments will not exceed the connection and local service charges for one month.
- (f) Neither the Federal Universal Service Charge nor the South Carolina Intrastate Universal Service Surcharge will be billed to Lifeline customers.

(N)

3.7 Lifeline Program (Cont'd.)

(N)

B. Regulations (Cont'd.)

(i) General (Cont'd.)

(g) A Lifeline subscriber's local service will not be disconnected for non-payment of regulated toll charges. Local service may be denied for non-payment of local calls in accordance with Section 2. Access to toll service may be denied for non-payment of regulated tolls. A Lifeline subscriber's request for reconnection of local service will not be denied if the service was previously denied for non-payment of toll charges.

(h) At no time shall a customer's Lifeline rate go below zero.

(ii) Eligibility

(a) To be eligible for a Lifeline credit, a customer must be a current recipient of any one of the following low income assistance programs.

1. Temporary Assistance to Needy Families (TAW), previously known as AFDC.
2. Food Stamps
3. Medicaid

(b) All applications for service are subject to verification with the state agency responsible for administration of the qualifying program.

(iii) Certification

(a) Proof of eligibility in any of the qualifying low income assistance programs should be provided to the Company within 30 days of application for service. The Lifeline credit will not be established until proof of eligibility has been received by the Company. When eligibility documentation is provided, the Lifeline credit will be provided on a going forward basis.

(b) The Company reserves the right to periodically audit its records, working in conjunction with the appropriate state agencies, for the purpose of determining continuing eligibility. Information obtained during such audit will be treated as confidential information to the extent required under State and Federal laws. The use or disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Lifeline plan.

(c) When a customer is determined to be ineligible as a result of an audit, the Company will contact the customer. If the customer cannot provide eligibility documentation within 60 calendar days, the Lifeline credit will be discontinued.

(N)

Issued: \_\_\_\_\_

David Dorwart, President & CEO  
dPi Teleconnect, LLC

Effective: \_\_\_\_\_

(N)

3.7 Lifeline Program (Cont'd.)

B. Regulations (Cont'd.)

(iv) General

- (a) Lifeline is provided as a monthly credit on the eligible residential subscriber's access line bill for local service.
- (b) Service Charges in Section 4 are applicable for installing or changing Lifeline service.
- (c) Link-Up connection assistance in Section 4 may be available for installing or relocating Lifeline service.
- (d) The Service Change Charge in Section 4 is not applicable when existing service is converted intact to Lifeline.
- (v) The total Lifeline credit consists of one federal credit plus one (1) Company credit

(a) Federal credit

Monthly Credit

- 1. Temporary Assistance to Needy Families \$10.00
- 2. Food Stamps \$10.00
- 3. Medicaid \$10.00

(b) Company credit

- 1. All programs, one per Lifeline service \$ 3.50

3.8 Link-Up South Carolina

A. General

- (i) Link-Up is a program designed to increase the availability of telecommunications services to low income subscribers by providing a credit to the non-recurring installation and service charges to qualifying residential subscribers. Basic terms and conditions are in compliance with the FCC's Order on Universal Service in CC Docket 97-157, which adopts the Federal-State Joint Board's recommendation in CC Docket 96-45, which complies with the Telecommunications Act of 1996. Specific terms and conditions are as prescribed by the South Carolina Public Service Commission and are as set forth in this tariff.
- (ii) Link-Up is supported by the federal universal service support mechanism.
- (iii) A federal credit amount of fifty percent (50%) of the non-recurring charges for connection of service, up to a maximum of thirty dollars (\$30.00), is available to be passed through to the subscriber.

(N)

3.8 Link-Up South Carolina (Cont'd.)

(N)

B. Regulations

(i) General

- (a) Customers eligible under Link-Up are also eligible for monthly recurring assistance under the Lifeline program.
- (b) Link-Up connection assistance is available per household and is applicable to the primary residential connection only.
- (c) The Link-Up credit is available each time the customer installs or relocates the primary residential service.
- (d) To receive the credit, proof of eligibility must be provided within 30 days after installation of service.
- (e) The total tariffed charges for connecting service, including service and other installation charges, are considered in the credit calculation.

(ii) Eligibility

- (a) To be eligible for a Link-Up credit, the named subscriber must be a current recipient of any of the following low income assistance programs:
  - 1. Temporary Assistance to Needy Families (TANF), previously known as AFDC
  - 2. Food Stamps
  - 3. Medicaid
- (b) All applications for service are subject to verification with the state agency responsible for administration of the qualifying program.

(iii) Certification

- (a) Proof of eligibility in any of the qualifying low income assistance programs should be provided to the Company within 30 days of application for service. The Link-Up credit will not be established until proof of eligibility has been received by the Company.
- (b) The use or disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Link-Up plan.

C. Rates and Charges

The federal credit available for a Link-Up connection is thirty dollars (\$30.00) maximum or fifty percent (50%) of the installation and service charges from this Tariff, whichever is less.

(N)

Issued: \_\_\_\_\_

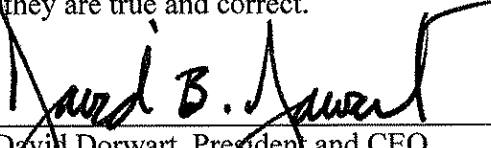
David Dorwart, President & CEO  
dPi Teleconnect, LLC

Effective: \_\_\_\_\_

State of Texas )  
 )  
County of Dallas )

**VERIFICATION OF APPLICANT**

I, David Dorwart of dPi Teleconnect, LLC, the applicant for Designation as an Eligible Telecommunications Carrier from the Public Service Commission of the State of Tennessee, verify that based on information and belief, I have knowledge of the statements in the foregoing Application, and I declare that they are true and correct.

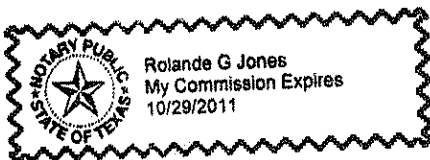
  
\_\_\_\_\_  
David Dorwart, President and CEO  
dPi Teleconnect, LLC

Subscribed and sworn to before me, a Notary Public in the State and County above named, this  
26 day of June 2008.

(Notary Seal)

  
\_\_\_\_\_  
(Signature of person authorized to administer oath)

My Commission Expires: 10-29-2011



TN - ETC