



A CITIZENS COMMUNICATIONS COMPANY

Government & External Affairs
180 S. Clinton Ave.
5th Floor
Rochester, NY 14646

August 11, 2008

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

Re: TRA Docket No. 08-00125
Section 254(e) Certification of Citizens Telecommunications Company of Tennessee LLC
and Citizens Telecommunications Company of the Volunteer State LLC to Receive USF
Disbursements in Calendar Year 2009

RECEIVED
2008 AUG 13 AM 11:01
T.R.A. DOCKET ROOM

Dear Chairman Hargett:

Enclosed please find:

1. Certification letters signed by Gregg C. Sayre (Attachment A)
2. Statements of 2007 federal Universal Service receipts subject to certification and the 2007 expenditures for provision, maintenance and upgrading of facilities and services supported by federal Universal Service funding. (Attachment B)
3. 13 copies of each filing.

If there are any questions, please direct to Cassandra Guinness at 585-777-4557.

Sincerely,

Carissa Nickel
Government & External Affairs

Enclosure



A CITIZENS COMMUNICATIONS COMPANY

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ATTACHMENT A

August 11, 2008

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


Re: TRA Docket No. 08-00125
Section 254(e) Certification of Citizens Telecommunications Company of the Volunteer
State LLC to Receive USF Disbursements in Calendar Year 2009

Dear Chairman Hargett:

I, Gregg C. Sayre, Assistant Secretary of Citizens Telecommunications Company of the Volunteer State LLC (the "Company"), do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am the Assistant Secretary of the Company;
2. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37), subject to the jurisdiction of the Tennessee Regulatory Authority; The SAC # is 290580
3. The Company is eligible for disbursements from the federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission ("FCC"); and
4. The Company will utilize its USF disbursements for high cost support (including any high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support) received in 2008 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act of 1934, as amended.

Sincerely yours,



Gregg C. Sayre
Assistant Secretary

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Citizens Telecommunications Company of the Volunteer State

Attachment B

Year 2007 Federal Universal Service Receipts Subject To Certification.

1 High cost loop support	\$0
2 Local switching support	\$346,296
3 TOTAL	\$346,296

Year 2007 Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

Plant Specific Operations Expenses	Actual 2007	Maintenance Provision Upgrade Total	78.7% 7.3% 14.0% 100.0%
4 Network support (Accts. 6110-16)	\$7,019	\$6,462,193	
5 General support (Accts. 6120-24)	\$608,394	\$601,704	
6 Central office (Accts. 6210-6215)	\$303,011	\$1,146,600	
7 Cable and wire facilities (Accts. 6410-6441)	\$601,704	\$8,210,497	
8 Network operations (Accts. 6530-35)	\$747,859	\$8,210,497	
9 Depreciation & amortization (Accts. 6560-65)	\$3,328,386		
10 Customer Operations Expenses			
11 Customer services (Accts. 6620-23)	\$732,539		
Corporate Operations Expenses			
12 Executive and planning (Accts. 6710-12)	\$142,592		
13 General and administrative (Accts. 6720-28)	\$592,393		
14 Total Year 2007 Supported Expenses, Before Return on Investment	\$7,063,897		
Additions			
15 Total central office switching (Acct. 2210)	\$88,494		
16 Total cable and wire (Acct. 2410)	\$1,058,106		
17 TOTAL	\$1,146,600		
18 Total Year 2007 Supported Expenditures Before Return On Investment	\$8,210,497		



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to Receive USF Disbursements in Calendar Year 2009

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Dear Chairman Hargett:

I, Gregg C. Sayre, Assistant Secretary of Citizens Telecommunications Company of Tennessee LLC (the "Company"), do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am the Assistant Secretary of the Company;
2. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37), subject to the jurisdiction of the Tennessee Regulatory Authority; The SAC # is 294336
3. The Company is eligible for disbursements from the federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission ("FCC"); and
4. The Company will utilize its USF disbursements for high cost support (including any high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support) received in 2008 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act of 1934, as amended.

Sincerely yours,

Gregg C. Sayre
Assistant Secretary

Citizens Telecommunications Company of Tennessee

Attachment B

Year 2007 Federal Universal Service Receipts Subject To Certification.

1 High cost loop support	\$3,804
2 Local switching support	\$0
3 TOTAL	\$3,804

Year 2007 Expenditures For Provision, Maintenance, and Upgrading Of Facilities and Services Supported By Federal Universal Service Funding

Plant Specific Operations Expenses	Actual 2007	Maintenance	
4 Network support (Accts. 6110-16)	\$28,633		74.5%
5 General support (Accts. 6120-24)	\$2,088,771	Provision	11.4%
6 Central office (Accts. 6210-6215)	\$1,448,546	Upgrade	14.0%
7 Cable and wire facilities (Accts. 6410-6441)	\$3,597,829	Total	100.0%
8 Network operations (Accts. 6530-35)	\$2,970,606		
9 Depreciation & amortization (Accts. 6560-65)	\$11,426,395		
10 Customer Operations Expenses			
11 Customer services (Accts. 6620-23)	\$2,703,128		
Corporate Operations Expenses			
12 Executive and planning (Accts. 6710-12)	\$523,391		
13 General and administrative (Accts. 6720-28)	\$2,285,922		
14 Total Year 2007 Supported Expenses, Before Return on Investment	\$27,073,221		
Additions			
15 Total central office switching (Acct. 2210)	\$65,321		
16 Total cable and wire (Acct. 2410)	\$4,351,456		
17 TOTAL	\$4,416,777		
18 Total Year 2007 Supported Expenditures Before Return On Investment	\$31,489,998		