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Eddie Roberson, Ph.D., Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-505

T.R.A. LOCKET ROOM

July 25, 2008

08-00143

Subject: Application of NewPhone for designation as an eligible telecommunications carrier (ETC) pursuant to 47 U.S.C. 214(e)

Dear Mr. Roberson:

Please accept this application for designation of Image Access, Inc. d/b/a NewPhone ("NewPhone") as an eligible telecommunications carrier (ETC) pursuant to 47 U.S.C. 214(e).

Enclosed for filing with the Regulatory Authority are the original and thirteen (13) copies of the application and supporting documentation. NewPhone has met the requirements for ETC designation. Grant of this request will serve the public interest by allowing NewPhone to serve current and additional low-income subscribers.

Please date and time stamp the extra copy as proof of filing and return it in the enclosed self addressed stamped envelope. Please refer any questions about this application to me at 5555 Hilton Avenue, Suite 415, Baton Rouge, LA, 70808 or telephone at 225-214-4414.

Sincerely,

Jim Dry
President
Image Access, Inc. d/b/a NewPhone

BEFORE THE TENNESSEE REGULATORY AUTHORITY

APPLICATION OF)	
IMAGE ACCESS, INC. d/b/a)	
NEWPHONE FOR CERTIFICATION)	
AS AN ELIGIBLE TELECOMMUNICATIONS)	DOCKET NO.:
CARRIER)	

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

Image Access, Inc. d/b/a NewPhone (“NewPhone” or the “Company”), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules, regulations and orders of the Tennessee Regulatory Authority (the “TRA”), hereby applies to the TRA for certification as an Eligible Telecommunications Carrier (“ETC”) throughout the BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee or AT&T Southeast (“AT&T Tennessee”) exchanges and service areas of the State (the “Designated Service Area”) for the purpose of receiving low-income federal universal service support only.³ The Company is seeking only low income support, and is not requesting support from the federal high cost fund. As demonstrated below, NewPhone satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of NewPhone as an ETC in the Designated Service Area will serve the public interest. Accordingly, NewPhone respectfully requests that the TRA grant this Application.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ See Exhibit E.

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

Jim R. Dry
President
Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

I. Background

1. NewPhone is a Louisiana corporation⁴ and is authorized to conduct business as a foreign corporation in the State of Tennessee. Copies of the Company's Articles of Organization and authority to transact business in the State of Tennessee are on file with the TRA and incorporated herein by reference. The Company currently holds a Certificate of Public Convenience and Necessity to provide competing resold and facilities-based local exchange telecommunications services, including exchange access telecommunications services, and resold interexchange services within the State of Tennessee.⁵

2. The principal office of the Company is located at 5555 Hilton Avenue, Suite 415, Baton Rouge, Louisiana 70808. The Company provides pre-paid local exchange service in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through

⁴ Newphone was incorporated in the State of Louisiana on April 7, 1997.

⁵ In Docket No. 98-00460, by Order dated June 14, 1999, NewPhone was granted authority to resell communications services. In Docket No 03-00270, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Certificate of Public Convenience and Necessity* (July 22, 2003). In Docket No. 04-00213, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Amendment to Its Certificate of Public Convenience and Necessity* (November 15, 2004).

commercial agreements (“UNE’s”), consisting of the local loop, ports and transport, provided by AT&T Tennessee, that allows end-to-end switching and delivery of calls.

3. As set forth in Section 214(e)(2) of the Act, the TRA “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.”⁶ Upon designation as an ETC, the carrier shall be eligible to receive federal universal service support in accordance with Section 254 of the Act.⁷

4. The requirements for designation as an ETC set forth in Section 214 (e) (1) and 47 C.F.R. 54.201(d)(1) and (2), are that the carrier must be a common carrier and:

- (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.⁸

II. NewPhone Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area.

5. NewPhone is a common carrier as that term is defined in the Act.⁹ The Company provides competitive local telecommunications services in the Designated

⁶ 47 U.S.C. § 214(e)(2); see 47 C.F.R. §54.201(d) (FCC Rules citing the Act’s requirements).

⁷ 47 U.S.C. §214 (e)(1).

⁸ Id.

⁹ 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 . . .”).

Service Area pursuant to TRA Docket No. 98-00460 by Order dated June 14, 1999, referenced above.

6. NewPhone offers all of the supported services enumerated under Section 254 (c) via the resale of AT&T Tennessee's services in combination with using facilities obtained as UNE's, or the equivalents thereof, through commercial agreements with AT&T Tennessee. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services.¹⁰ Accordingly, the Company satisfies the requirements set forth in Section 214(e)(1)(A).

7. The services that are supported by the 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;

NewPhone meets this requirement by providing voice-grade access to the public switched telephone network (PSTN). Through its

¹⁰ 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 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). NewPhone's use of UNEs, or equivalents thereof, meets this definition of "facilities."

interconnection agreement with AT&T Tennessee, all customers of the Company are able to make and receive calls on the PSTN within the specified bandwidth.

- (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;

Although the FCC requires an ETC applicant to demonstrate that it offers a local usage plan comparable to the one offered by AT&T Tennessee in the service areas for which the applicant seeks designation, the FCC has not adopted a specific local usage threshold.¹¹ NewPhone offers unlimited local service in the AT&T Tennessee service areas permitting the customer to make an unlimited amount of local calls within his/her local calling area.

- (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;

NewPhone currently uses out-of-band digital signaling and in-band multi-frequency signaling that is functionally equivalent to DTMF in Tennessee.

- (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;

NewPhone meets the requirement of single-party service by providing its customers with exclusive use of a wireline subscriber loop for each call placed, through its interconnection agreement with AT&T Tennessee.

- (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

¹¹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45 (March 17, 2005) at paras. 32 – 34 (“FCC March 17, 2005 Order”).

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;

NewPhone currently provides all of its customers with access to emergency services by dialing 911 through its interconnection agreement with AT&T Tennessee in satisfaction of this requirement.

- (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;

NewPhone meets this requirement by providing all of its customers with access to operator services provided by AT&T Tennessee through its interconnection agreement with AT&T Tennessee.

- (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 functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier’s network;

NewPhone meets this requirement by providing all of its customers with the ability to connect with an interexchange carrier.

- (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

NewPhone meets this requirement by providing its customers with access to directory assistance.

- (I) Toll limitation for qualifying low-income consumers. Toll limitation service is defined as either “toll control” or “toll blocking” services pursuant to 47 C.F.R. 54-400(d).

NewPhone provides toll blocking services to requesting Lifeline eligible customers in Tennessee free-of-charge via its interconnection agreement with AT&T Tennessee.

8. NewPhone currently advertises the availability of the above-listed services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.¹²

9. Upon certification as an ETC, NewPhone will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income customers 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.¹³ Attached hereto as Exhibit A and incorporated herein by reference are copies of NewPhone’s proposed Lifeline and Linkup tariff to be filed with the TRA upon approval. The Company’s advertising plan is designed to provide notification of the existence of low-income programs to the widest possible audience in the Designated Service Area in Tennessee.

III. Area for Which ETC Certification is Requested.

10. NewPhone has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural incumbent telephone company (BellSouth/AT&T Tennessee) in the State of Tennessee. NewPhone does not seek certification as an ETC in any areas served by any Rural Telephone Company in the State of Tennessee. The Company does not provide local exchange service in any area served

¹² See 47 C.F.R. §§ 54.201(d)(2).

by any Rural Telephone Company in the State of Tennessee. The exchanges in the AT&T Tennessee service area that NewPhone serves and for which it seeks ETC designation are attached as Exhibit E.

11. NewPhone will provide Lifeline and Link-Up services in the Designated Service Area where AT&T Tennessee is the incumbent local exchange carrier.

IV. Granting Newphone's Application Will Serve the Public Interest.

12. 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 eligible customers by the amount of that support.¹⁴ NewPhone will pass through all applicable state and federal service discounts and mandated service support to its Lifeline and Link-Up customers, thus reducing the price of access to telecommunications services for the Lifeline and Link-Up eligible customers in Tennessee.

13. NewPhone complies with all applicable consumer protection and service quality standards in Tennessee.

14. Congress requires that the TRA grant competitive ETC applications in non-rural areas.¹⁵ No specific public interest test is mentioned, as is the case for areas served by Rural Telephone Companies.¹⁶ Thus, the Act provides that the TRA "shall" designate NewPhone as an ETC upon finding that the Company meets the nine-point list

¹³ See 47 C.F.R. §§ 54.401-54.417; 54.405(b)&54.411(d).

¹⁴ *In the Matter of Federal-State Joint Board on Universal Service, Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. Sect. 214(e)(1)(A) and 47 C.F.R. 54.201(i)*, para. 26 (CC Docket No. 96-45, rel. Sept. 8, 2005).

¹⁵ See 47 U.S.C. 214(e)(2).

¹⁶ See *Id.*

of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding the foregoing, the designation of NewPhone as an ETC will serve the public interest.

15. 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.”¹⁷ Designation of NewPhone as an ETC would further these goals. Granting ETC status to NewPhone would allow the Company to obtain federal low-income universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

16. NewPhone 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 NewPhone’s service.

17. NewPhone will provide universal service as an ETC in all of its Designated Service Area. Designation of NewPhone as an ETC will increase the low-income consumer’s choice of carriers. For those consumers who have been disconnected

¹⁷ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56,56 (1996).

from AT&T Tennessee or other competitive carriers for non-payment of bills, NewPhone provides an alternative service to these consumers.

18. NewPhone's customers generally have poor credit and have had service disconnected by AT&T Tennessee or another competitive carrier because of unpaid bills. These consumers may be without telephone service because of an inability to bring their accounts current and comply with other requirements for being reconnected to the telephone network, such as the payment of a deposit and/or reconnection fee. NewPhone removes significant barriers to telephone subscribership by providing service to all Lifeline and Link-Up eligible consumers within its Designated Service Area of Tennessee without credit checks or the posting of a deposit, and despite the customer having been disconnected by another carrier.

19. NewPhone provides toll restriction services throughout its Designated Service Area in Tennessee, free of charge, as required by the FCC rules. As an alternative to subscription to toll interexchange services, NewPhone provides prepaid long distance. As a result, the majority of NewPhone's customers choose toll restriction services and/or prepaid long distance, which leads to affordable telephone service for the low-income consumer.

20. Under FCC guidelines, where applicable, 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 its requirement is where an applicant's requested ETC serving territory would qualify it to

receive no “high cost” federal universal service support, but only “low income” federal universal service support. Because NewPhone seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers in Tennessee, submission of a Five-Year Network Improvement Plan is not required at this time.

21. Under FCC guidelines, where applicable, an ETC Applicant must demonstrate its ability to remain functional in emergency situations: (47 C.F.R. § 54.202(a)(2); FCC March 17, 2005 Order, at para. 25). Because NewPhone is providing service to its customers through the resale of AT&T Tennessee’s service and/or through the use of facilities leased from AT&T Tennessee, this arrangement allows NewPhone to provide to its customers the same ability to remain functional in emergency situations as currently provided by AT&T Tennessee to its 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.

22. Under FCC guidelines, where applicable, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making reasonable requests for service. (FCC March 17, 2005 Order, at para. 22; 47 C.F.R. § 54.202(a)(1)(i)). NewPhone commits to provide service throughout its proposed ETC-Designated Service Area to all customers making reasonable requests for service.

V. Exhibits

23. Attached as Exhibit A and incorporated herein by reference are copies of NewPhone's proposed Lifeline and Linkup tariff to be filed with the TRA upon approval.

24. Attached as Exhibit B and incorporated herein by reference are NewPhone's updated financial statements demonstrating that the Company has the financial qualifications to provide the services specified herein. NewPhone has previously provided the TRA with evidence of its financial capabilities to provide the supported services in the context of its application to become certified as a CLEC in Tennessee.¹⁸ *The financial statements of NewPhone contain proprietary and confidential information not generally available to the public and thus have been marked confidential and are being submitted under seal to be maintained by the TRA and TRA staff on a confidential basis pursuant to the TRA's current rules.*

25. Attached as Exhibit C and incorporated herein by reference is a current list of officers of NewPhone. NewPhone has previously provided the TRA with evidence of its managerial and technical capabilities to provide the supported services in the context of its application to become certified as a CLEC in Tennessee.¹⁹

26. Attached as Exhibit D to this Application and incorporated herein by reference is an Affidavit of Jim R. Dry, President of NewPhone certifying that the

¹⁸ See Docket No. 98-00460, by Order dated June 14, 1999, NewPhone was granted authority to resell communications services. In Docket No 03-00270, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Certificate of Public Convenience and Necessity* (July 22, 2003). In Docket No 04-00213, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Amendment to its Certificate of Public Convenience and Necessity* (November 15, 2004).

¹⁹ See Footnote 18 (above).

Company satisfies all of the requirements for designation as an ETC to serve the Designated Area.

VI. Relief Requested

For the foregoing reasons, Image Access, Inc. d/b/a NewPhone respectfully requests that the TRA grant its Application for designation as an Eligible Telecommunications Carrier for the purposes of receiving low-income, Lifeline and Link-Up, federal universal service support in the Designated Service Area in Tennessee.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jim R. Dry", is written over a horizontal line.

JIM R. DRY-PRESIDENT
IMAGE ACCESS, INC. D/B/A NEWPHONE
5555 HILTON AVENUE, SUITE 415
BATON ROUGE, LOUISIANA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

VERIFICATION

I, Jim R. Dry, President of Image Access, Inc. d/b/a NewPhone, do verify, on behalf of applicant, that Image Access, Inc. d/b/a NewPhone will comply with and abide by the TRA guidelines and requirements presently in effect or otherwise adopted in the future.



JIM R. DRY
PRESIDENT

Exhibit A

Proposed Lifeline and Linkup Tariff

G. Lifeline

1. Applicability:

- a. Lifeline discounts are applicable to local exchange services provided to eligible residential Applicants.

2. Territory:

- a. Within the base rate areas of all BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee or AT&T Southeast ("AT&T Tennessee") exchanges as shown and defined in the Incumbent LEC's current and effective Tariffs on file with the Commission.

3. Discounts:

- a. Lifeline is provided as a reduction of the subscriber's access line rate for local service in amounts equal to the sum of the state and/or federal approved and supported credits.

4. Terms and Condition:

- a. Lifeline is provided only to the customer's principle residence.
- b. One low-income credit is available per household and 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 5 following.
- c. Proof of eligibility in any of the qualifying low-income assistance programs should be provided to the Company at the time of application for service. The Lifeline credit will not be established until the Company has received proof of eligibility.
- d. When, for any reason, a customer is determined to be ineligible the Company will contact the customer. If the customer cannot provide eligibility documentation, the Lifeline account will be disconnected.
- e. Certification of eligibility in any of the qualifying low-income assistance programs will be required for any account that has been disconnected prior to the reestablishment of the service.

5. Eligible low-income assistance programs:

- a. The eligible low-income assistance programs are the same as those defined in the AT&T Tennessee's current and effective Tariffs on file with the Commission.

Issued: _____

Issued By: Jim Dry
President

5555 Hilton Ave, Suite 415
Baton Rouge, LA 70808
BR.553725.1

Effective: _____

H. Link-Up

1. Link-Up is a connection assistance program, which provides for the reduction of applicable charges associated with connection of telephone service.
2. The applicant must meet the requirements for qualification for Lifeline Telephone Service.

Issued: _____

Issued By: Jim Dry
President

5555 Hilton Ave, Suite 415
Baton Rouge, LA 70808
BR.553725.1

Effective: _____

Exhibit B

Financial Statements

These documents demonstrate NewPhone's financial ability to provide the proposed services. NewPhone is a privately-held corporation and as such its financial statements are not public information, but rather constitute confidential and proprietary information. NewPhone's financial statements are therefore submitted under seal. NewPhone respectfully requests that this confidential information not be provided to anyone except those members of Staff and the Regulatory Authority who need to review the material for evaluation of Applicant's fitness to provide service.

New Phone Income Statement

For the Year Ended December 31, 2007

2007

Sales

Telephone Service	\$	4,999,587
Other Revenue		170,653
Net Sales	\$	5,170,240

Cost of Goods Sold

Cost of Lines	\$	2,138,312
Taxes		358,470
Total Cost of Goods Sold	\$	2,496,782

Gross Profit On Sales

\$ 2,673,458

Operating Expenses

Advertising	\$	698,814
Rent & Utilities		58,113
Bank Charges		48,440
Payment Commissions		48,229
Dues and Subscriptions		9,894
Insurance		7,365
Legal/ Accounting Fees		99,593
401(k) Expenses & Employee Benefits		14,962
Licenses/Permits		-
Outside Services		89,802
Postage and Delivery		55,965
Printing and Reproduction		938
Office Supplies		3,180
Telephone		71,560
Meals/Entertainment		925
Payroll		490,695
Group Insurance		54,789
Travel Expenses		5,611
Interest Expense		52,680
Payroll Taxes		61,327
Miscellaneous Expense		427
Total Operating Expenses	\$	1,873,309

Income Before Owners' Comp, Depr., & Tx

\$ 800,149

Owners' Compensation	\$	300,982
Depreciation		84,104
Software		-

Net Income

\$ 415,063

New Phone Balance Sheet 2007

December 31, 2007

ASSETS

CURRENT ASSETS

Cash	\$	14,320
Accounts Receivable		3,745
Credits due from BellSouth		496,194
Reserve for non-collection of credits		
Prepaid Expenses		
TOTAL CURRENT ASSETS	\$	514,259

FIXED ASSETS

Furniture, Fixtures & Equipment	\$	683,723
Less Accumulated Depreciation		626,283
TOTAL FIXED ASSETS	\$	57,440

OTHER ASSETS

Loans to Owners	\$	300,000
Other Loans Receivable		1,661,360
Deposits		
TOTAL OTHER ASSETS	\$	1,961,360

TOTAL ASSETS

\$ 2,533,059

LIABILITIES AND EQUITY

CURRENT LIABILITIES

Accounts Payable-Trade	\$	183,330
Accrued Liabilities		19,831
Bell Cash Back		432,425
Loans from Stockholders		
Line of Credit & Short Term Notes		564,678
TOTAL CURRENT LIABILITIES	\$	1,200,264

LONG-TERM DEBT

L-T Notes Payable		
TOTAL LONG-TERM DEBT	\$	-
TOTAL LIABILITIES	\$	1,200,264

STOCKHOLDERS EQUITY

Paid-In Capital	\$	59,318
Retained Earnings		2,113,968
Shareholder Distributions		(1,255,554)
Net Profit/(Loss)		415,063
TOTAL EQUITY	\$	1,332,795

TOTAL LIABILITIES AND EQUITY

\$ 2,533,059

Exhibit C

Current List of Officers

NewPhone Corporate Principal Officers

Jim R. Dry

President

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Gene R. Dry

Vice President, Legal Affairs

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Richard R. Jaubert

Vice President & Chief Financial Officer (CFO)

Image Access, Inc. d/b/a NewPhone
5555 Hilton Avenue, Suite 415
Baton Rouge, LA 70808
Telephone: (225) 214-4414
Fax: (225) 214-4111

Exhibit D

Certification/Affidavit in Support of the Application

AFFIDAVIT OF JIM R. DRY
IN SUPPORT OF
PETITION OF
IMAGE ACCESS, INC. D/B/A NEWPHONE AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN TENNESSEE

Jim R. Dry, being first duly sworn upon oath, deposes and states as follows:

1. I am President of Image Access, Inc. d/b/a NewPhone (“Newphone”). My office is currently located at 5555 Hilton Avenue, Suite 415, Baton Rouge, LA 70808.

2. I have read the foregoing Application and all information therein is true and correct to the best of my knowledge, information and belief.

3. NewPhone currently holds a Certificate of Public Convenience and Necessity to provide competing resold and facilities-based local exchange telecommunications services, including exchange access telecommunications services, and resold interexchange services Tennessee.²⁰ NewPhone is currently providing telecommunications services in Tennessee to residential consumers throughout the AT&T Tennessee local exchange service areas of the State.

4. NewPhone respectfully requests federal ETC designation in the AT&T Tennessee service areas throughout the state as set forth in the Application. NewPhone requests ETC designation only for the purpose of obtaining reimbursement from the federal low-income portion (Lifeline and Linkup) of the federal universal service mechanisms from the federal Universal Service Administrative Company. NewPhone is

²⁰ See Docket No. 98-00460, by Order dated June 14, 1999, NewPhone was granted authority to resell communications services. In Docket No 03-00270, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Certificate of Public Convenience and Necessity* (July 22, 2003). In Docket No 04-00213, Image Access, Inc. d/b/a NewPhone was granted an *Initial Order Granting Amendment to its Certificate of Public Convenience and Necessity* (November 15, 2004).

not requesting ETC status for the purpose of receiving support from the high cost portion of the federal universal service support mechanisms.

5. As set forth in the Application, NewPhone fulfills the FCC's requirements for ETC designation because:

- a. NewPhone is a common carrier;
- b. NewPhone provides the services supported by the federal universal service support mechanisms;
- c. NewPhone has made a reasonable demonstration of its capability and commitment to provide the supported services, as enumerated and described in the Application, to low-income consumers in Tennessee;
- d. NewPhone provides the support services in Tennessee to Lifeline and Link-Up eligible consumers via a combination of its own facilities and resale of AT&T Tennessee's retail services;
- e. NewPhone advertises the availability of Lifeline and Link-Up eligible services in Tennessee via television advertisement, newspaper advertisement and customer brochures;
- f. NewPhone will comply with all applicable requirements of the FCC and the TRA, as addressed in the Application and as required by the TRA;
- g. NewPhone will pass through to its Lifeline and Link-Up eligible customers all discounts and waivers required by the FCC's rules; and
- h. NewPhone's designation as an ETC in the AT&T Tennessee service areas is in the public interest because such designation will: 1) lead to increased

consumer choice of carriers, and provide an alternative to higher priced pre-paid local exchange carriers; 2) lead to increased subscribership due to advertising, which increases consumer awareness, and the provision of service without the imposition of deposits or credit checks; 3) lead to reduced toll charges for customers due to NewPhone's policy of educating consumers about toll limitation services and prepaid long distance telephone service; 4) make premium services available to low-income consumers; and 5) contribute to low-income consumers' continued presence on the public telephone network through the Company's provision of affordable service.

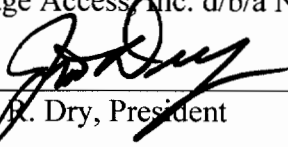
7. NewPhone's designation will have no measurable impact on the federal universal service fund. The Company requests reimbursement for low-income support only and will receive reimbursements previously received by other carriers, except in the case where a customer subscribes to telephone service for the first time.

8. No party to this petition is subject of a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Sec. 862, and Sections 1.2001-1.2003 of the FCC's rules, 47 C.F.R. Sects. 1.2001-1.2003.

9. This concludes my Affidavit.

Respectfully submitted this 31st day of July, 2008.

Image Access, Inc. d/b/a NewPhone



Jim R. Dry, President

Subscribed and sworn to before me, Sharon C. Ragusa, a Notary Public in
and for the State of Louisiana, on this 31st day of July, 2008.



Sharon C. Ragusa #039606

My commission expires: At Death

Exhibit E

**Exchanges in the AT&T Tennessee Service Areas that NewPhone serves
and for which it seeks ETC designation.**

Source: Section A 3.6 of AT&T Tennessee's General Subscriber Service Tariff

Source: Section A 3.6 of AT&T Tennessee's General Subscriber Service Tariff

Company

Rate Center

BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	APISON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BENTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHARLESTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHATTANOOGA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CLEVELAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COLLEGE STATION
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COLLEGEDALE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COPPER BASIN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DAYTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DECATUR
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DUNLAP
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FALL CREEK FALLS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GEORGETOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	JASPER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LIBERTY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NINE MILE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OOLTEWAH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PIKEVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SODDY DAISY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOUTH PITTSBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPRING CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WHITWELL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ATHENS
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BEAN STATION
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BULLS GAP
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHESTNUT HILL
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ENGLEWOOD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ETOWAH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GATLINBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GREENBACK
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HALLS CROSS ROAD
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	JEFFERSON CITY
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LA FOLLETTE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAKE CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LENOIR CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LOUDON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MADISONVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MARYVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MASCOT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MAYNARDVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MORRISTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NEW TAZEWEILL

BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NEWPORT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NIOTA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NORRIS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OAK RIDGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OAKDALE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OLIVER SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ONEIDA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PETROS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	POWELL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	RICEVILLE
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ROCKWOOD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ROGERSVILLE
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WATERVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WEST SWEETWATER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WHITE PINE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ADAMSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ALAMO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ARLINGTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ATWOOD
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAGRANGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LATHAM
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LEXINGTON
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SAVANNAH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SCOTTS HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SELMER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SHARON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SHELBY FOREST
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SHILOH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SIDONIA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOMERVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOUTH MOSCOW
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	STANTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TIPTONVILLE
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TREZEVANT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TRIMBLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TROY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	UNION CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WEST WHITEVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WHITEVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	YELLOW CREEK
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	YORKVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ADAMS-CEDAR HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ALEXANDRI
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ASHLAND CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	AUBURNTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BAXTER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BEECH GROVE

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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BELFAST
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BETHPAGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BLANCHE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BON DECROFT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	BYRDSTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CARTHAGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CELINA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CENTERTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CENTERVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHAPEL HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHARLOTTE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CHESTNUT MOUND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CLARKRANGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CLARKSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CLIFTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COLLEGE GROVE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COLLINWOOD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COLUMBIA
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BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	COOKEVILLE SOUTH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CORNERSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CRAWFORD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CROSS PLAINS ORLINDA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CROSSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CULLEOKA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CUMBERLAND CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	CUNNINGHAM
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DEFEATED
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DIBRELL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DICKSON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DOVER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	DOYLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	EAGLETON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	EAGLEVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	EAST SANGO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ELKTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ERIN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ESTILL SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ETHRIDGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FAIRVIEW
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FAYETTEVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FIVE POINTS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FLAT CREEK
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FLINTVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FOSTERVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FRANCISCOALABAMA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FRANKLIN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	FREDONIA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GAINESBORO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GALLATIN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GOODLETTSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GORDONSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GRANVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GREEN GROVE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	GREENBRIER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HAMPSHIRE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HARTSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HENDERSONVILLE

BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HIGHLAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HILLSBORO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HILLSDALE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HOHENWALD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	HUNTLAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	JAMESTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	KINGSTON SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAAGER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAFAYETTE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAVERGNE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LAWRENCEBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LEBANON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LEOMA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LEWISBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LIBERTY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LINDEN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LIVINGSTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LOBELVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LORETTO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LYLES
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LYNCHBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	LYNNVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MANCHESTER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MCBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MCEWEN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MCMINNIVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MILTON
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MINOR HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MONTEAGLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MONTEREY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MOSS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MOUNT JULIET
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MOUNT PLEASANT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	MURFREESBORO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NASHVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NEW JOHNSONVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NOLENSVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NORENE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NORMANDY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NORTH SPRINGS HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	NORTH SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OLD HICKORY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	OLD ZION
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PALMYRA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PELHAM
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PETERSBURG
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PLEASANT HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PLEASANT SHADE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PLEASANT VIEW
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PORTLAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	PULASKI
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	RED BOILING SPRINGS
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	RICKMAN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ROCK ISLAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SANGO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SANTE FE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SEWANCE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SHELBYVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SMITHVILLE

BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SMYRNA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOUTH CUNNINGHAM
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOUTH FREDONIA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SOUTH OAK GROVE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPARTA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPENCER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPENCER MILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPRING HILL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SPRINGFIELD
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	ST. JOSEPH
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	SUMMERTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TANSI
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TEMPERANCE HALL
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TENNESSEE RIDGE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TRACY CITY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TRIUNE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	TULLAHOMA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	UNIONVILLE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	VANLEER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	VETO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	VIOLA
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WARTRACE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WATERTOWN
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WAVERLY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WAYNESBORO
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WEST VANLEER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WESTMORELAND
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WHITE BLUFF
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WHITE HOUSE
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WILLIAMSPORT
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WINCHESTER
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WOODBURY
BELLSOUTH TLECOMM INC DBA AT&T TENNESSEE OR AT&T SOUTHEAST	WOODLAND