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January 26, 2009

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

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 01/26/09

Re: Image Access, Inc. d/b/a NewPhone
Docket No. 08-00143

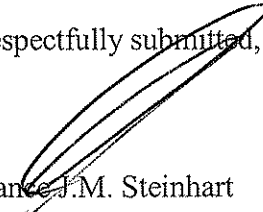
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of the responses to Supplemental Data Request No. 1 Information for Image Access, Inc. d/b/a NewPhone. This filing has also been sent via e-mail to sharla.dillon@state.tn.us on January 26, 2009.

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 additional information, please do not hesitate to contact me.

Respectfully submitted,



Lance J.M. Steinhart
Attorney for Image Access, Inc. d/b/a NewPhone

Enclosures

cc: Mr. Jim R. Dry

Question No. 1 NewPhone needs to file a tariff for Lifeline and Link Up following the guidelines in Authority Rule 1220-4-1-.02. Filing requirements are for an original and three copies with the cover giving a description of the reason for filing and the requested effective date.

ANSWER: Under separate cover, NewPhone has submitted its tariff revision pages for approval on January 26, 2009. Attached as Exhibit A, please find a copy of the cover letter reflecting submission to the Tennessee Regulatory Authority.

Question No. 2 NewPhone's response needs clarification by identifying the rate centers where it is providing service. Additionally, NewPhone must identify, by each rate center, whether services are provided by resale, by leased UNEs or both. Additionally, identify the number of lines where service is provided by UNE.

ANSWER: NewPhone's residential service is available throughout the AT&T service territory, and is being provided in numerous rate centers. See Exhibit B.

Question No. 3 The CD was not enclosed as indicated. Additionally, detail on advertising, either in use or planned, in other service areas is required. Please list the service areas, other than Memphis, and provide the means of advertising utilized and/or planned to be utilized by NewPhone along with copies of the advertisement(s).

ANSWER: NewPhone plans to do additional television advertising in Nashville, Chattanooga, and Knoxville after our ETC designation. We also plan to distribute brochures to as many social service agencies as we can. Please see attached CD Rom with TV ad as Exhibit C.

Question No. 4 Lifeline customers receive a reduction in rates comparable to the subsidies paid by the Federal Universal Service Fund. Identify NewPhone's basic service recurring and non-recurring rates and charges and itemize the amount of NewPhone's Lifeline and Link Up service reductions.

ANSWER: NewPhone's basic service is \$39.95 and our installation charge is \$30.00. The lifeline service reduction would be \$13.50 and Link Up is one half of the installation.

Question No. 8 Outline NewPhone's plans for ensuring its customers continue receiving telecommunications services should AT&T relinquish a particular service area.

ANSWER: NewPhone's plan would be to contact the new service provider and contract with them to continue providing service.

Question No. 9 Describe NewPhone's plans for demonstrating to the Authority that for those Lifeline customers served via resale of another carrier's services, NewPhone is not receiving the federal universal service Lifeline credit from the serving company and filing for credit with the Universal Service Administration Company.

ANSWER: NewPhone is aware that receiving credit from both the USAC and the serving company is not allowed. We would provide the Authority any documents requested to demonstrate this to the Authority.

Question No. 10 NewPhone does not have a current Wireline Activity Report on file with the Authority. In accordance with the requirements established in Authority Docket No. 97-00309, NewPhone is required to file a Wireline Activity Report monthly.

Submit a copy of NewPhone's most recent report.

ANSWER: NewPhone was unaware that we are required to monthly file a Wireline Activity Report. We apologize for this error and will immediately begin filing the report on a monthly basis.

Exhibit A

Coverletter submitted under separate cover for approval of tariff
revisions to include Lifeline and Link Up language

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Re: Image Access, Inc. d/b/a NewPhone

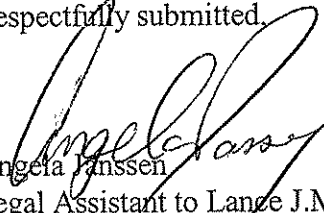
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of tariff revisions to IMAGE ACCESS, INC. d/b/a NewPhone's Tennessee Tariff No. 3 with an effective date of February 26, 2009. This filing has also been sent via e-mail to sharla.dillon@state.tn.us on January 26, 2009.

These tariff changes reflect the incorporation of Lifeline and Link Up language.

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 via phone (678.775.2253) or email (ajanssen@telecomcounsel.com).

Respectfully submitted,


Angela Janssen
Legal Assistant to Lance J.M. Steinhart
Attorney for Image Access, Inc. d/b/a NewPhone

Enclosures

cc: Mr. Jim Dry

Exhibit B
Rate Centers

NewPhone
Service by Rate Center - Tennessee
as of January 21, 2009

RATE CENTER	Switch	Resale	UNE
Arlington,	ARTNTNMT	1	0
Arlington, Total		1	0
Athens,	ATHNTNMA	1	0
Athens, Total		1	0
Bethel Springs,	BTSPTNMA	1	0
Bethel Springs, Total		1	0
Bolivar,	BLVRTNMA	2	0
Bolivar, Total		2	0
Brownsville,	BWVLTNMA	12	0
Brownsville, Total		12	0
Chattanooga,	CHTGTNBR	5	0
	CHTGTNDT	20	0
	CHTGTNMV	1	0
	CHTGTNNS	10	0
	CHTGTNRB	2	0
	CHTGTNSE	1	0
Chattanooga, Total		39	0
Clarksville,	CLVLTNMA	1	0
Clarksville, Total		1	0
Cleveland,	CLEVTNMA	5	0
Cleveland, Total		5	0
Collierville,	CRVLTNMA	4	0
Collierville, Total		4	0
Copper Basin,	CRHLTNCB	2	0
Copper Basin, Total		2	0
Covington,	CVTNTNMT	26	0
Covington, Total		26	0
Cumberland Gap,	CLDGTNMA	1	0
Cumberland Gap, Total		1	0
Dickson,	DKSNTNMT	3	0
Dickson, Total		3	0
Dyersburg,	DYBGTNMA	7	0
Dyersburg, Total		7	0
Elkton,	PLSKTNMA	1	0
Elkton, Total		1	0
Etowah,	ETWHTNMT	1	0
Etowah, Total		1	0
Georgetown,	CLEVTNMA	5	0
Georgetown, Total		5	0
Grand Junction,	GDJTTNMA	4	0
Grand Junction, Total		4	0
Halls,	HLLSTNMT	6	0
Halls, Total		6	0
Harriman,	HIMNTNMA	3	0
Harriman, Total		3	0
Henderson,	HNSNTNMT	2	0
Henderson, Total		2	0
Henning,	HNNGTNMA	2	0
Henning, Total		2	0
Humboldt,	HMBLTNMA	3	0
Humboldt, Total		3	0
Jackson,	JCSNTNMA	6	0
Jackson, Total		6	0
Jasper,	JSPRTNMT	1	0
Jasper, Total		1	0
Jellico,	JLLCTNMA	3	0
Jellico, Total		3	0
Kingston,	KGTNTNMT	1	0
Kingston, Total		1	0
Knoxville,	KNVLTNFC	4	0
	KNVLTNMA	5	0

NewPhone
Service by Rate Center - Tennessee
as of January 21, 2009

RATE CENTER	Switch	Resale	UNE
	KNVLTNWH	2	0
	KNVLTNYH	1	0
	MAVLTNMA	3	0
Knoxville, Total		15	0
Lagrange,	GDJTTNMA	4	0
Lagrange, Total		4	0
Lebanon,	LBNNTNMA	1	0
Lebanon, Total		1	0
Lenoir City,	LNCYTNMA	1	0
Lenoir City, Total		1	0
Lewisburg,	LWBGTNMA	1	0
Lewisburg, Total		1	0
Lexington,	LXTNTNMA	3	0
Lexington, Total		3	0
Loudon,	LODNTNMA	1	0
Loudon, Total		1	0
Lynnville,	LYVLTNMA	1	0
Lynnville, Total		1	0
Maryville,	FIVLTNMA	1	0
	MAVLTNMA	3	0
Maryville, Total		4	0
Mascot,	MSCTTNMT	2	0
Mascot, Total		2	0
Maynardville,	MYVLTNMA	1	0
Maynardville, Total		1	0
Memphis,	MMPHTNBA	71	0
	MMPHTNCK	46	0
	MMPHTNCT	67	0
	MMPHTNEL	6	0
	MMPHTNFR	105	0
	MMPHTNGT	16	0
	MMPHTNMA	66	0
	MMPHTNMT	50	0
	MMPHTNOA	107	0
	MMPHTNSL	77	0
	MMPHTNST	81	0
	MMPHTNWW	47	0
Memphis, Total		739	0
Milan,	MILNTNMA	2	0
Milan, Total		2	0
Moscow,	MSCWTNMA	5	0
Moscow, Total		5	0
Mount Pleasant,	MNPLTNMA	1	0
Mount Pleasant, Total		1	0
Murfreesboro,	MRBOTNMA	2	0
Murfreesboro, Total		2	0
Nashville,	NSVLTNIN	5	0
	NSVLTNMC	1	0
	NSVLTNMT	2	0
	NSVLTNWC	1	0
Nashville, Total		9	0
Newbern,	NWBRTNMA	2	0
Newbern, Total		2	0
Norris,	NRRSTNMA	1	0
Norris, Total		1	0
Oak Ridge,	OKRGTNMT	1	0
Oak Ridge, Total		1	0
Pulaski,	PLSKTNMA	1	0
Pulaski, Total		1	0
Ripley,	RPLYTNMA	11	0
Ripley, Total		11	0

NewPhone
Service by Rate Center - Tennessee
as of January 21, 2009

RATE CENTER	Switch	Resale	UNE
Rockwood,	RKWDTNMA	1	0
Rockwood, Total		1	0
Rogersville,	RRVLTNMA	2	0
Rogersville, Total		2	0
Sevierville,	SVVLTNMT	1	0
Sevierville, Total		1	0
Sneedville,	SNVLTNMA	1	0
Sneedville, Total		1	0
Soddy Daisy,	SDDSTNMA	2	0
Soddy Daisy, Total		2	0
Solway,	OKRGTNMT	1	0
Solway, Total		1	0
Somerville,	SOVLTNMT	14	0
Somerville, Total		14	0
South Oak Grove,	OKGVKYES	1	0
South Oak Grove, Total		1	0
South Pittsburg,	SPBGTNMA	1	0
South Pittsburg, Total		1	0
Spring City,	SPCYTNMT	1	0
Spring City, Total		1	0
Springfield,	SPFDTNMA	1	0
Springfield, Total		1	0
West Whiteville,	WHVLTNMT	5	0
West Whiteville, Total		5	0
Whiteville,	WHVLTNMT	5	0
Whiteville, Total		5	0
Whitwell,	WHWLTNMA	1	0
Whitwell, Total		1	0
Winchester,	WNCHTNMA	3	0
Winchester, Total		3	0
Grand Total		991	991

Exhibit C

CD-Rom with TV ad in .wmv format