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KNOXVILLE  
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October 2, 2009

VIA E-MAIL AND HAND DELIVERY

Chairman Sara Kyle  
c/o Ms. Sharla Dillon  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**Re: Joint Application Of Ardmore Telephone Company, Inc., Ardmore Communications LLC and Synergy Technology Partners, Inc. Regarding Transfer of Control, Docket No. 09-00103**

Dear Chairman Kyle:

Enclosed please find an original and five (5) copies of Applicants' Fourth Supplemental Response to the Tennessee Regulatory Authority's Data Request No. 1, Question 1. Applicants have also transmitted this submission electronically to the Authority. Please stamp a copy of this Response as "filed" and return it to me by way of our courier.

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

With kindest regards, I remain

Very truly yours,



R. Dale Grimes

Enclosures

cc: Hon. Mary Freeman (*w/o enclosure*)  
Hon. Eddie Roberson, Ph.D. (*w/o enclosure*)  
Hon. Kenneth C. Hill (*w/o enclosure*)  
Andy McQueen, Esq.  
Mr. Trevor Bonnstetter  
Mr. Levoy Knowles  
Mr. Clyde Warren Nunn

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Chairman Sara Kyle  
October 2, 2009  
Page 2

Melvin Malone, Esq.  
Clint Cromwell, Esq.  
Mr. Terry Wales

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**Docket 09-00103 Joint Application of Ardmore Telephone Company, Inc.,  
and Synergy Technology Partners, Inc. Regarding Transfer of Control of Ardmore  
Telephone Company, Inc.**

**Tennessee Regulatory Authority Data Request No. 1 to Petitioners, dated August 19, 2009**

**Q1.** Have the Petitioners filed a similar application with the FCC? If so, list any action taken and the associated docket number. If a schedule to complete the review of your petition has been established by any federal agency, provide such with your response.

**A:** Yes. On August 11, 2009, Petitioners filed an application with the Federal Communications Commission ("FCC") seeking FCC consent to the assignment and transfer of control of International Section 214 authority, file number ITC-ASG-20090811-00371 ("International 214 Application"), and an application seeking FCC consent to the transfer of control of wireless licenses held by Ardmore Telephone Company, Inc. (FCC Form 603) (file number 0003917876). On August 19, 2009, the FCC issued a public notice accepting Petitioners' wireless application and establishing a 14-day notice period (relevant excerpts attached as Exhibit 1).

On August 12, 2009, Petitioners also filed an application requesting FCC consent for the assignment and transfer of control of Domestic Section 214 authority ("Domestic 214 Application"). On August 14, 2009, the FCC released a public notice accepting Petitioners' Domestic 214 Application for filing and setting a deadline of August 28, 2009 for the filing of comments in WC Docket 09-148 (attached as Exhibit 2). Reply Comments will be due by September 4, 2009. Petitioners' Domestic 214 Application is not eligible for streamlined treatment under FCC rules.

On August 25, 2009, the FCC contacted counsel for the Petitioners and requested that the Petitioners file separate applications to address the assignment and transfer of control of the International Section 214 authority - the first to address the merger of Ardmore Telephone Company, Inc. with Ardmore Communications, Inc., and a second to address Synergy Technology Partners, Inc.'s stock purchase of Ardmore Telephone Company, Inc. Pursuant to direction from FCC staff, Petitioners will amend the International 214 Application filed August 11, 2009, to address the merger and will file a new application to address the stock purchase. Petitioners are currently preparing the amendment and application and expect to have both filed with the FCC no later than September 1, 2009. Both applications will be subject to streamlined consideration under applicable FCC rules.

**SUPPLEMENTAL RESPONSE:** In accordance with direction from FCC staff, counsel for Petitioners submitted an amended International 214 Application on August 31, 2009. The transfer of control application, which had to be manually filed, was filed on September 1, 2009. As noted above, both applications will be subject to streamlined consideration under applicable FCC rules. These documents are attached hereto as Supplemental Exhibit 1.

In WC Docket 09-148, the docket opened to address the Domestic 214 Application, the FCC issued a Public Notice setting an August 28, 2009 deadline to submit comments on the application. No comments were submitted in that docket.

**SECOND SUPPLEMENTAL RESPONSE:** On September 14, 2009, the FCC issued a Public Notice consenting to the assignment and transfer of control of domestic Section 214

authority in connection with the Merger of Ardmore Communications, LLC (Ardmore Communications) and Ardmore Telephone Company, Inc. (Ardmore) and the transfer of control of Ardmore to Synergy Technology Partners, Inc. (Synergy). The Public Notice regarding the granting of the Domestic 214 Application is attached hereto as Second Supplemental Exhibit 1.

Previously, on September 11, 2009, the FCC issued a Public Notice, "Streamlined International Applications Accepted for Filing" in which the FCC accepted for filing the application of Ardmore Communications and Ardmore for "consent to the assignment of international section 214 authorization" requested "[p]ursuant to the terms of an underlying merger transaction, [whereby] Ardmore Communications will merge with and into Ardmore, with Ardmore emerging as the surviving entity." In the same Public Notice, the FCC also accepted for filing Ardmore's application seeking FCC consent to the transfer of control of international Section 214 authority from Ardmore to Synergy. Pursuant to the September 11<sup>th</sup> Public Notice, both international 214 applications will be automatically granted September 25, 2009, unless the applications are formally opposed or the Commission subsequently deems the applications ineligible for streamlined treatment by that date. The Public Notice regarding the streamlined treatment of the two International 214 Applications is attached hereto as Second Supplemental Exhibit 2.

**THIRD SUPPLEMENTAL RESPONSE:** On September 16, 2009, the FCC issued a Public Notice (attached hereto as Third Supplemental Exhibit 1) granting consent to the transfer of control of wireless licenses held by Ardmore Telephone Company, Inc. to Synergy Technology Partners, Inc. (FCC Form 603) (file number 0003917876). This leaves only

the International 214 Applications outstanding with the FCC, which have a September 25, 2009 deadline, whereupon the FCC will automatically grant the applications unless the applications are formally opposed or the Commission subsequently deems the applications ineligible for streamlined treatment by that date. To date, no comments have been filed.

**FOURTH SUPPLEMENTAL RESPONSE:** During the week of September 28, 2009, the FCC granted approval of both outstanding International Section 214 Applications. The IFBS record granting approval of the International Section 214 Application for the merger of Ardmore Communications with Ardmore is attached as Fourth Supplemental Exhibit 1. The IFBS record granting approval of the International Section 214 Application for Synergy Technology Partners acquisition of Ardmore is attached as Fourth Supplemental Exhibit 2.

With these approvals, all FCC applications relating to the merger of Ardmore Communications and Ardmore, and the acquisition of Ardmore by Synergy Technology Partners have now been granted.

# **Fourth Supplemental Exhibit 1**



**INTERNATIONAL BUREAU  
FCC SELECTED APPLICATION LISTING BY FILE NUMBER  
REPORT WR07 - Thu Oct 1 10:44:55 US/Eastern 2009**

File Number = ITCASG2009081100371;

**File Number:** ITC-ASG-20090811-00371

**Callsign:** None

**Streamlined:** Y

**Environmental Impact:** None

**Status:** Action Complete

**Red Light:** N

**Status Date:** 10/01/2009

**Last Action:** Grant of Authority

**Grant Date:** 10/01/2009

**DA #:** None

**Released Date:** 09/10/2009

**Accepted For Filing PN Date:** 09/11/2009

**Action Taken PN Date:** None

**Term Begin Date:** None

**Term End Date:** None

**Date Filed:** 08/11/2009

**Last Action Date:** 10/01/2009

**Bond Date:** None

**Adopted Date:** 09/10/2009

**Document Viewing**

[Other filings related to this application  
\(Petitions, comments, etc\)](#)

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[Attachment Menu](#)

[PDF Version of this application.](#)

[HTML version of this application.](#)

**Old File Number:** None

**Applicant:**

Ardmore Telephone Company Inc  
30190 Ardmore Ave  
549

Ardmore, TN 38449- USA

**Contact:** Michael R. Bennet

Bennet & Bennet, PLLC  
4350 East West Highway  
Suite 201

Bethesda, MD 20814 USA

**Description:** Application for consent to the assignment of international section 214 authorization, ITC-214-20000214-00058, held by Ardmore Communications, LLC (Ardmore Communications) to Ardmore Telephone Company Inc. (Ardmore). Pursuant to the terms of an underlying

**FROM:**

ARDMORE COMMUNICATIONS, LLC.  
30190 ARDMORE AVENUE

ARDMORE, TN 38449 USA

**TO:**

Ardmore Telephone Company Inc  
30190 Ardmore Ave  
549

Ardmore, TN 38449- USA



**File Numbers:** ITC-214-20000214-00058,

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- [IHF Current Authorizations by Expiration Due Date](#)
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- [IPF Pending Application List](#)

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*FCC - Federal Communications Commission - IBFS Internet Reports - Thu Oct 1 10:44:58 US/Eastern  
2009*

# **Fourth Supplemental Exhibit 2**



Federal  
Communications  
Commission

**INTERNATIONAL BUREAU  
FCC SELECTED APPLICATION LISTING BY FILE NUMBER  
REPORT WR07 - Tue Sep 29 14:49:39 US/Eastern 2009**

File Number = ITCT/C2009090200412;

<b>File Number:</b> ITC-T/C-20090902-00412	<b>Accepted For Filing PN Date:</b> <u>09/11/2009</u>
<b>Callsign:</b> None	<b>Action Taken PN Date:</b> None
<b>Streamlined:</b> Y	<b>Term Begin Date:</b> None
<b>Environmental Impact:</b> None	<b>Term End Date:</b> None
<b>Status:</b> Action Complete	<b>Date Filed:</b> 09/02/2009
<b>Red Light:</b> N	
<b>Status Date:</b> 09/25/2009	
<b>Last Action:</b> Grant of Authority	<b>Last Action Date:</b> 09/25/2009
<b>Grant Date:</b> 09/25/2009	<b>Bond Date:</b> None
<b>DA #:</b> None	<b>Adopted Date:</b> 09/10/2009
<b>Released Date:</b> 09/10/2009	

**Document Viewing**

[Other filings related to this application](#)  
(Petitions, comments, etc)

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**Old File Number:** None

**Applicant:**

Ardmore Telephone Company Inc  
30190 Ardmore Ave  
549  
Ardmore, TN 38449- USA

**Contact:** None

SAME AS APPLICANT  
SAME AS APPLICANT

, USA

**Description:** Application for consent to the transfer of control of international section 214 authorization, ITC-214-20000214-00058, held by Ardmore Telephone Company Inc. (Ardmore) to Synergy Technology Partners, Inc. (Synergy). Pursuant to the terms of a Stock Purch

**FROM:**

Ardmore Telephone Company Inc  
30190 Ardmore Ave  
549  
Ardmore, TN 38449- USA

**TO:**

Synergy Technology Partners, Inc.  
237 North 8th Street  
P.O. Box 649  
Mayfield, KY 42066- USA

**File Numbers:** ITC-214-20000214-00058,

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2009*