## TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway Nashville, Tennessee 37243-0505

November 4, 2009

Melvin J. Malone Miller & Marting PLLC 1200 One Nashville Place 150 Fourth Avenue North Nashville, TN 37219

RE: Docket 09-00103: Joint Application of Ardmore Telephone Company, Inc. and Synergy Technology Partners, Inc. Regarding Transfers of Control

Dear Mr. Malone:

In order to analyze recent filings in the above-referenced *Joint Application*, the Tennessee Regulatory Authority requires additional information. The questions herein generally pertain to the *Expedited Petition* for approval of a financing transaction filed on October 29, 2009. Please provide the information requested below by November 11, 2009, and refer to this correspondence as Data Request No. 3 in the response.

- 1. Provide the current capital structure of Ardmore Telephone Company, Inc. ("Ardmore") and Synergy Technology Partners, Inc. ("Synergy"). For comparison, provide the capital structure of Ardmore and Synergy if the financing transaction described in the *Expedited Petition* is approved.
- 2. Provide the amount, term, interest rate and source of all of Ardmore's current indebtedness.
- 3. Provide the amount of debt that Ardmore will service if the financing transaction described in the *Expedited Petition* is approved.
- 4. Discuss the regulatory accounting treatment by Ardmore of the financing transaction described in the *Expedited Petition*.
- 5. Provide forecasted annual financial statements for the next five years for Ardmore and Synergy under the assumption that the financing transaction described in the *Expedited Petition* is approved. Such financial statements should clearly show all funds flows between Ardmore and Synergy, goodwill assets and interest expenses.
- 6. Based upon the forecasted financial statements in response to question five, comment on whether the financing transaction will necessitate a rate increase by Ardmore.
- 7. Provide copies of all agreements between Synergy and Ardmore related to payment of debt incurred as a result of the proposed financing transaction.
- 8. Detail all funds that will be provided by Synergy as part of the transaction.
- 9. Detail all funding sources that will be used to service debt incurred from the financing transaction described in the *Expedited Petition*.

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-5015 www.state.tn.us/tra

If you have any questions or need further assistance, please call me at 615-741-2791, ext. 153 or e-mail me at <a href="mailto:jerry.Kettles@tn.gov">jerry.Kettles@tn.gov</a>. Please respond by sending the original and 13 copies either by U.S. Mail or express mail. Alternatively, you may send the original and four (4) copies along with an electronic file to:

Ms. Sharla Dillon, Docket Room Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 Email: Sharla.Dillon@tn.gov

Sincerely,

Jerry Kettles, Chief

Economic Analysis & Policy Division

c: Levoy Knowles