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July 15, 2009

VIA ELECTRONIC FILING
AND OVERNIGHT MAIL

Honorable Jones, Chairman
Attn: Sharla Dillon, Dockets
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-9021
(615) 741-3939

Re: Lifeconnex Telecom, LLC
ETC Designation

09-00108

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T.R.A. DOCKET ROOM

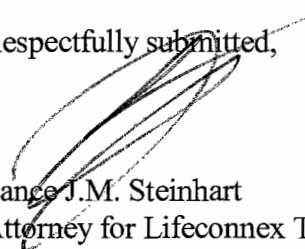
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of Lifeconnex Telecom, LLC's Application for Designation as an Eligible Telecommunications Carrier. I have also enclosed a check in the amount of \$25.00 payable to the "Tennessee Regulatory Authority" for the filing fee and a CD-ROM containing an electronic copy of this filing.

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. Thank you.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for Lifeconnex Telecom, LLC

Enclosures

cc: Angie M. Watson

SWIFTEL
BACK UP ACCOUNT
811 W GARDEN ST
PENSACOLA FL 32501-4618

1072

DATE 5-27-09

63-4/630 FL
308

PAY TO THE ORDER OF Tennessee Regulatory Authority

\$ 25.00

Twenty five 00/100

DOLLARS

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FOR ETC Filings

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BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSION

APPLICATION OF)	
LIFECONNEX TELECOM, LLC)	
FOR DESIGNATION AS AN ELIGIBLE)	DOCKET NO.
TELECOMMUNICATIONS CARRIER)	

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

Lifeconnex Telecom, LLC (“Lifeconnex” or the “Applicant”), 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 and regulations of the Tennessee Public Service Commission (the “Commission”), hereby applies to the Commission for Designation as an Eligible Telecommunications Carrier (“ETC”) throughout the BellSouth Telecommunications, Inc. d/b/a AT&T of Tennessee service territories (the “Designated Service Area”) for the purpose of receiving federal universal service support. A list of each wire center which the Applicant is requesting ETC status in the State of Tennessee is attached hereto as Exhibit 1. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, Lifeconnex satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of Lifeconnex as an ETC in the Designated Service Area will serve the public interest. Accordingly, Lifeconnex respectfully requests that the Commission grant this Application.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

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

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I. Background

1. Lifeconnex is an Louisiana Corporation³. A copy of the Applicant's Articles of Incorporation is on file with the Commission and incorporated herein by reference. The Applicant was granted a Certificate of Convenience and Necessity ("CCN") to Provide Competing Local Exchange Telecommunications Services Within the State of Tennessee in Case No. 08-00141 per Order issued on October 22, 2008. The principal office of the Applicant is located at 13700 Perdido Key Drive, Unit B222, Perdido Key, Florida 32507. The telephone number of the Applicant is (225) 293-3332. The Applicant will provide local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through agreements with AT&T of Tennessee that allow end-to-end switching and delivery of calls.

³ Lifeconnex was incorporated in the State of Florida on August 18, 2006.

2. As set forth in Section 214(e)(2) of the Act, the Commission “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.”⁴ Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.⁵

3. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- (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.⁶

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

4. Lifeconnex is a common carrier as that term is defined in the Act.⁷ The Applicant provides competitive local telecommunications services in the Designated Service Area pursuant to Case No. 08-00141 referenced above.

5. Lifeconnex will offer all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs, or the equivalents thereof. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services

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

⁵ 47 U.S.C. § 214(e)(1).

⁶ *Id.*

⁷ *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 . . .”).

using either its own facilities or a combination of its own facilities and resale of another carrier's services.⁸ Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

6. The services that are supported by 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;
- 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;
- 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;
- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a

⁸ 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 network 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). Lifeconnex's use of UNEs, including §251 loops, or equivalents thereof, commingled with § 271 elements provided pursuant to an agreement filed with the Commission pursuant to § 252, meets this definition of "facilities."

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;

- 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 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;
- 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;

- 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 the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- 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
- i) Toll limitation for qualifying low-income consumers.

7. Upon Designation as an ETC, Lifeconnex will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income consumers 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.⁹ The FCC has concluded that even pure resellers may qualify as an ETC and properly use universal service support for the purposes for which it was intended by offering reduced price Lifeline service.¹⁰

8. Lifeconnex will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules.¹¹

III. Area for Which ETC Certification Is Requested

9. Lifeconnex has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the state of Tennessee. Lifeconnex does not seek Designation as an ETC in any areas served by rural telephone companies.

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

10. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹² No specific public interest test is mentioned, as is the case for areas served by

⁹ See 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d)..

¹⁰ See *Federal-State Joint Board on Universal Service, Petition of Tracfone Wireless, Inc.*, 20 FCC Rcd 15095 (2005) (finding that because Lifeline support is customer-specific and is directly reflected in the price that the eligible customer pays, it is impossible for any carrier to receive a double recovery of the support).

¹¹ See 47 C.F.R. §§ 54.201(d)(2).

¹² See 47 U.S.C. 214(e)(2).

rural telephone companies.¹³ Thus, the Act provides that the Commission “shall” designate Lifeconnex as an ETC upon finding that the Applicant meets the nine-point list of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding, the designation of Lifeconnex as an ETC will serve the public interest.

11. Lifeconnex 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 Lifeconnex’s service.

12. Lifeconnex will provide universal service as an ETC in all of its Designated Service Area.

13. Lifeconnex is willing to accept carrier of last resort obligations throughout the universal service areas in which Lifeconnex is designated as an ETC by the Commission.

14. Lifeconnex is aware that it may seek USF funding only with respect to those customers that it serves through the use of its own facilities (including unbundled network elements or equivalent facilities).

15. Lifeconnex will provide equal access to interexchange service.

16. Under FCC guidelines, 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 this requirement is where an applicant’s requested ETC

¹³ See *Id.*

serving territory would qualify it to receive no “high cost” USF support, but only “low income” USF support. Because Lifeconnex seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, and is distributed on a per-customer basis and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

17. Applicant offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

18. Under FCC guidelines, an ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 CFR §54.202(a)(3); *see In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Dkt. No. 96-45, 20 FCC Rcd 6371, para. 28 (2005) (FCC ETC Order). Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC ETC Order. Applicant in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

19. Under FCC guidelines, an ETC Applicant must demonstrate its ability to remain functional in emergency situations. 47 CFR §54.202(a)(2); *see* FCC ETC Order at para. 25. Applicant provides to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

20. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service.

21. Applicant has petitions for ETC status pending in States of Alabama, Florida, Georgia, Kentucky, Mississippi, Louisiana, North Carolina and South Carolina.

V. Relief Requested

For the foregoing reasons, Lifeconnex respectfully requests that the Commission grant its application and designate the Applicant as an ETC for the Designated Service Area.

Respectfully submitted,



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Attorney for Lifeconnex Telecom, LLC

Exhibit 1
Wire Centers

STATE	STUDY AREA CODE	ILEC	WIRE CENTER CLLI	WIRE CENTER NAME
TN	295185	BELL SOUTH	ACHLTNMT	ADAMS-CEDAR HILL
TN	295185	BELL SOUTH	ALLTEL Y	ASHLAND CITY
TN	295185	BELL SOUTH	ARTNTNMT	ARLINGTON
TN	295185	BELL SOUTH	ATHNTNMA	ATHENS
TN	295185	BELL SOUTH	BGSNTNMA	BIG SANDY
TN	295185	BELL SOUTH	BLGPTNMA	BULLS GAP
TN	295185	BELL SOUTH	BLLSTNMA	BELLS
TN	295185	BELL SOUTH	BLNCTNMT	BLANCHE
TN	295185	BELL SOUTH	BLVRTNMA	BOLIVAR
TN	295185	BELL SOUTH	BNTNTNMT	BENTON
TN	295185	BELL SOUTH	BTSPTNMA	BETHEL SPRINGS
TN	295185	BELL SOUTH	BWVLTNMA	BROWNSVILLE
TN	295185	BELL SOUTH	CHRLTNMT	CHARLOTTE
TN	295185	BELL SOUTH	CHTGTNBR	CHATTANOOGA-BRAINERD
TN	295185	BELL SOUTH	CHTGTNDT	CHATTANOOGA-DODDS AVE
TN	295185	BELL SOUTH	CHTGTNHT	CHATTANOOGA-HARRISON
TN	295185	BELL SOUTH	CHTGTNMV	CHATTANOOGA-MIDDLE VALLEY
TN	295185	BELL SOUTH	CHTGTNNS	CHATTANOOGA-NINST STREET
TN	295185	BELL SOUTH	CHTGTNRB	CHATTANOOGA-REDBANK
TN	295185	BELL SOUTH	CHTGTNRO	CHATTANOOGA-ROSSVILLE
TN	295185	BELL SOUTH	CHTGTNSE	CHATTANOOGA-ST ELMO
TN	295185	BELL SOUTH	CHTGTNSM	CHATTANOOGA-SIGNAL MOUNTAIN
TN	295185	BELL SOUTH	CHTNTNMT	CHARLESTON
TN	295185	BELL SOUTH	CLDGTNMA	CUMBERLAND GAP
TN	295185	BELL SOUTH	CLEVTNMA	CLEVELAND
TN	295185	BELL SOUTH	CLMATNMA	COLUMBIA MAIN
TN	295185	BELL SOUTH	CLTNTNMA	CLINTON
TN	295185	BELL SOUTH	CLVLTNMA	CLARKSVILLE MAIN
TN	295185	BELL SOUTH	CMCYTNMT	CUMBERLAND CITY
TN	295185	BELL SOUTH	CMDNTNMA	CAMDEN
TN	295185	BELL SOUTH	CNHMTNMA	CUNNINGHAM
TN	295185	BELL SOUTH	CNVLTNMA	CENTERVILLE
TN	295185	BELL SOUTH	CRHLTNCB	COPPER HILL
TN	295185	BELL SOUTH	CRPLTNMA	CROSS PLAINS-ORLINDA
TN	295185	BELL SOUTH	CRTHTNMA	CARTHAGE
TN	295185	BELL SOUTH	CRVLTNMA	COLLIERVILLE
TN	295185	BELL SOUTH	CULKTNMA	CULLEOKA
TN	295185	BELL SOUTH	CVTNTNMT	COVINGTON
TN	295185	BELL SOUTH	DCTRNTNMT	DECATUR
TN	295185	BELL SOUTH	DKSNTNMT	DICKSON
TN	295185	BELL SOUTH	DNRGTNMA	DANDRIDGE
TN	295185	BELL SOUTH	DOVRTNMT	DOVER

TN	295185	BELL SOUTH	DYBGTNMA	DYERSBURG
TN	295185	BELL SOUTH	DYERTNMT	DYER
TN	295185	BELL SOUTH	DYTNMA	DAYTON
TN	295185	BELL SOUTH	EAVLTNMA	EAGLEVILLE
TN	295185	BELL SOUTH	ETWHTNMT	ETOWAH
TN	295185	BELL SOUTH	FIVLTNMA	MARYVILLE-FRIENDSVILLE
TN	295185	BELL SOUTH	FKLNTNCC	COOL SPRINGS
TN	295185	BELL SOUTH	FKLNTNMA	FRANKLIN
TN	295185	BELL SOUTH	FLVLTNMA	FLINTVILLE
TN	295185	BELL SOUTH	FRDNTNMA	FREDONIA
TN	295185	BELL SOUTH	FRVWTNMT	FAIRVIEW
TN	295185	BELL SOUTH	FYVLTNMA	FAYETTEVILLE
TN	295185	BELL SOUTH	GALLTNMA	GALLATIN
TN	295185	BELL SOUTH	GBSNTNMT	GIBSON
TN	295185	BELL SOUTH	GDJTTNMA	GRAND JUNCTION
TN	295185	BELL SOUTH	GDVLTNMA	GOODLETTSVILLE
TN	295185	BELL SOUTH	GLSNTNMA	GLEASON
TN	295185	BELL SOUTH	GNBRTNMA	GREENBRIER
TN	295185	BELL SOUTH	GNFDTNMT	GREENFIELD
TN	295185	BELL SOUTH	GRNBTNMA	GREENBACK
TN	295185	BELL SOUTH	GTBGTNMT	GATLINBURG
TN	295185	BELL SOUTH	GTWSTNSW	MEMPHIS-SOUTHWIND
TN	295185	BELL SOUTH	HDVLTNMA	HENDERSONVILLE
TN	295185	BELL SOUTH	HHNWTNMA	HOHENWALD
TN	295185	BELL SOUTH	HIMNTNMA	HARRIMAN
TN	295185	BELL SOUTH	HLLSTNMT	HALLS
TN	295185	BELL SOUTH	HMBLTNMA	HUMBOLDT
TN	295185	BELL SOUTH	HMPSTNMA	HAMPSHIRE
TN	295185	BELL SOUTH	HNLDTNMA	HUNT LAND
TN	295185	BELL SOUTH	HNNGTNMA	HENNING
TN	295185	BELL SOUTH	HNSNTNMT	HENDERSON
TN	295185	BELL SOUTH	HNTGTNMA	HUNTINGDON
TN	295185	BELL SOUTH	HRFRTNMA	NEWPORT-HARTFORD
TN	295185	BELL SOUTH	HRNBTNMT	HORNBEAK
TN	295185	BELL SOUTH	HTVLTNMA	HARTSVILLE
TN	295185	BELL SOUTH	JCSNTNMA	JACKSON-MAIN
TN	295185	BELL SOUTH	JCSNTNNS	JACKSON-NORTHSIDE
TN	295185	BELL SOUTH	JFCYTNMA	JEFFERSON CITY
TN	295185	BELL SOUTH	JLLCTNMA	JELICO
TN	295185	BELL SOUTH	JSPRTNMT	JASPER
TN	295185	BELL SOUTH	KGTNTNMT	KINGSTON
TN	295185	BELL SOUTH	KNTNTNMA	KENTON
TN	295185	BELL SOUTH	KNVLTNBE	KNOXVILLE-BEARDEN
TN	295185	BELL SOUTH	KNVLTNFC	KNOXVILLE-FOUNTAIN CITY

TN	295185	BELL SOUTH	KNVLTNMA	KNOXVILLE-MAIN
TN	295185	BELL SOUTH	KNVLTNWH	KNOXVILLE-WEST HILLS
TN	295185	BELL SOUTH	KNVLTNYH	KNOXVILLE-YOUNG HIGH
TN	295185	BELL SOUTH	LBNNTNMA	LEBANON
TN	295185	BELL SOUTH	LFLTNTMA	LAFOLLETTE
TN	295185	BELL SOUTH	LKCYTNMA	LAKE CITY
TN	295185	BELL SOUTH	LNCYTNMA	LENOIR CITY
TN	295185	BELL SOUTH	LODNTNMA	LOUDON
TN	295185	BELL SOUTH	LRBGTNMA	LAWRENCEBURG
TN	295185	BELL SOUTH	LWBGTNMA	LEWISBURG
TN	295185	BELL SOUTH	LXTNTNMA	LEXINGTON
TN	295185	BELL SOUTH	LYBGTNMT	LYNCHBURG
TN	295185	BELL SOUTH	LYLSTNMA	LYLES
TN	295185	BELL SOUTH	LYVLTNMA	LYNNVILLE
TN	295185	BELL SOUTH	MAVLTNMA	MARYVILLE-MAIN
TN	295185	BELL SOUTH	MCKNTNMA	MCKENZIE
TN	295185	BELL SOUTH	MCWNTNMT	MCEWEN
TN	295185	BELL SOUTH	MDTNTNMA	MIDDLETON
TN	295185	BELL SOUTH	MDVITNMT	MADISONVILLE
TN	295185	BELL SOUTH	MEDNTNMA	MEDINA
TN	295185	BELL SOUTH	MILNTNMA	MILAN
TN	295185	BELL SOUTH	MMPHTNBA	MEMPHIS-BARTLETT
TN	295185	BELL SOUTH	MMPHTNCK	MEMPHIS-CHEROKEE
TN	295185	BELL SOUTH	MMPHTNCT	MEMPHIS-CHICKASAW
TN	295185	BELL SOUTH	MMPHTNEL	MEMPHIS-EASTLAND
TN	295185	BELL SOUTH	MMPHTNFR	MEMPHIS-FRAYSER
TN	295185	BELL SOUTH	MMPHTNGT	MEMPHIS-GERMANTOWN
TN	295185	BELL SOUTH	MMPHTNMA	MEMPHIS-MAIN
TN	295185	BELL SOUTH	MMPHTNMT	MEMPHIS-MIDTOWN
TN	295185	BELL SOUTH	MMPHTNOA	MEMPHIS-OAKVILLE
TN	295185	BELL SOUTH	MMPHTNSL	MEMPHIS-SOUTHLAND
TN	295185	BELL SOUTH	MMPHTNST	MEMPHIS-SOUTHSIDE
TN	295185	BELL SOUTH	MMPHTNWW	MEMPHIS-WESTWOOD
TN	295185	BELL SOUTH	MNCHTNMA	MANCHESTER
TN	295185	BELL SOUTH	MNPLTNMA	MOUNT PLEASANT
TN	295185	BELL SOUTH	MRBOTNMA	MURFREESBORO
TN	295185	BELL SOUTH	MRTWTNMA	MORRISTOWN
TN	295185	BELL SOUTH	MSCTTNMT	MALLTEL OT
TN	295185	BELL SOUTH	MSCWTNMA	MOSCOW
TN	295185	BELL SOUTH	MYVLTNMA	MAYNARDVILLE
TN	295185	BELL SOUTH	NRRSTNMA	NORRIS
TN	295185	BELL SOUTH	NSVLTNAA	NASHVILLE-AIRPORT AUTHORITY
TN	295185	BELL SOUTH	NSVLTNAP	NASHVILLE-AIRPORT
TN	295185	BELL SOUTH	NSVLTNBH	NASHVILLE-BURTON HILLS

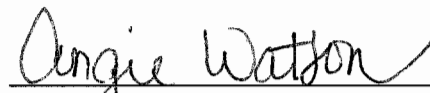
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TN	295185	BELL SOUTH	PSVWTNMT	PLEASANT VIEW
TN	295185	BELL SOUTH	PTBGTNMA	PETERSBURG
TN	295185	BELL SOUTH	PTLDTNMA	PORTLAND
TN	295185	BELL SOUTH	RDGLTNMA	RIDGELY
TN	295185	BELL SOUTH	RKWDTNMA	ROCKWOOD
TN	295185	BELL SOUTH	RPLYTNMA	RIPLEY
TN	295185	BELL SOUTH	RRVLTNMA	ROGERSVILLE
TN	295185	BELL SOUTH	SANGTNMT	SANGO
TN	295185	BELL SOUTH	SDDSTNMA	SODDY DAISY
TN	295185	BELL SOUTH	SEWNTNMW	SEWANEE
TN	295185	BELL SOUTH	SHVLTNMA	SHELBYVILLE
TN	295185	BELL SOUTH	SLMRTNMT	SELMER
TN	295185	BELL SOUTH	SMTWTNMA	SUMMERTOWN
TN	295185	BELL SOUTH	SMYRTNMA	SMYRNA
TN	295185	BELL SOUTH	SNTFTNMA	SANTA FE
TN	295185	BELL SOUTH	SNVLTNMA	SNEEDVILLE
TN	295185	BELL SOUTH	SOVLTNMT	SOMERVILLE
TN	295185	BELL SOUTH	SPBGTNMA	SOUTH PITTSBURG
TN	295185	BELL SOUTH	SPCYTNMT	SPRING CITY
TN	295185	BELL SOUTH	SPFDTNMA	SPRINGFIELD
TN	295185	BELL SOUTH	SPHLTNMT	SPRING HILL
TN	295185	BELL SOUTH	SRVLTNMA	SURGOINSVILLE
TN	295185	BELL SOUTH	SVNHTNMT	SAVANNAH

TN	295185	BELL SOUTH	SVVLTNMT	SEVIERVILLE
TN	295185	BELL SOUTH	SWTWTNMT	SWEETWATER
TN	295185	BELL SOUTH	TLLHTNMA	TULLAHOMA
TN	295185	BELL SOUTH	TPVLTNMA	TIPTONVILLE
TN	295185	BELL SOUTH	TRINTNMA	TRIUNE
TN	295185	BELL SOUTH	TROYTNMT	TROY
TN	295185	BELL SOUTH	TRTNTNMA	TRENTON
TN	295185	BELL SOUTH	TWNSTNMA	MARYVILLE-TOWNSEND
TN	295185	BELL SOUTH	UNCYTNMA	UNION CITY
TN	295185	BELL SOUTH	VNLRTNMA	VANLEER
TN	295185	BELL SOUTH	WHBLTNMT	WHITE BLUFF
TN	295185	BELL SOUTH	WHHSTNMA	WHITE HOUSE
TN	295185	BELL SOUTH	WHPITNMA	WHITE PINE
TN	295185	BELL SOUTH	WHVLTNMT	WHITEVILLE
TN	295185	BELL SOUTH	WHWLTNMA	WHITWELL
TN	295185	BELL SOUTH	WLPTTNMA	WILLIAMSPORT
TN	295185	BELL SOUTH	WNCHTNMA	WINCHESTER
TN	295185	BELL SOUTH	WRTRTNMT	WARTRACE
TN	295185	BELL SOUTH	WTTWTNMA	WATERTOWN
TN	295185	BELL SOUTH	WVRLTNMT	WAVERLY

State of Georgia)
)
County of Fulton)


VERIFICATION OF APPLICANT

I, Angie M. Watson, President of Lifeconnex Telecom, LLC, the applicant for Designation as an Eligible Telecommunications Carrier from the Tennessee Regulatory Authority of the State of Tennessee, verify that based on information and belief, I have knowledge of the statements in the foregoing Application, and I declare that they are true and correct.

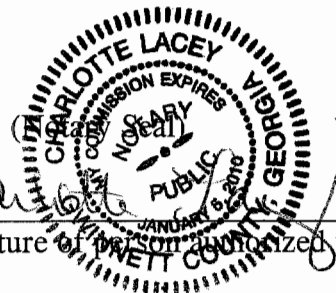


Angie M. Watson, President
Lifeconnex Telecom, LLC

Subscribed and sworn to before me, a Notary Public in the State and County above named, this 17th day of July 2009.



(Signature of Notary Public authorized to administer oath)



My Commission Expires: _____