

Mr. David Foster
Chief, Utilities Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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T.R.A. DOCKET ROOM

Re: TRA Docket No: 10-00140
Section 254(e) Self Certification of
Eligibility of Image Access Inc.
d/b/a New Phone to receive
USF Disbursements in Calendar
Year 2011


Dear Mr. Foster,
Image Access, Inc. ("Company") herby provides the required certification and requested information regarding the amount and allocation of support received.

Certification

On behalf of the Company, I Jim Dry, an officer of Image Access, Inc., d/b/a New Phone do herby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

1. I am the president of the Company;
2. The Company is certified as a Competitive Eligible Telecommunications Carrier ("ETC") in the exchanges of ETC certified non-rural incumbent local exchange carrier, Bellsouth Telecommunications, Inc., in the state of Tennessee;
3. As such, the Company is eligible to receive disbursements from the Universal Service Fund in an manner and amount equal to the disbursements received by Bellsouth Telecommunications, Inc, Tennessee as prescribed by the Federal Communications Commission; and
4. The Company will utilize all federal high cost support only for provision, maintenance, and upgrading of facilities and services for with the support is intended, consistent with 47 U.S.C. § 254(e) of the Telecommunications Act of 1996.

Respectfully Submitted,



Jim Dry
President
Image Access, Inc.

Attachments

Mr. David Foster
August 23, 2010

Requested Information

1. Amount of Support the Company Received for the Past Fiscal Year

For the Fiscal 2010, the Company did not receive and high cost support, only low income support. In accordance with notification received, the Tennessee Regulatory Authority requested all companies that intend to file for certification to receive USF support for Fiscal Year 2011 submit its request to the TRA. In order to enable the Authority to properly evaluate the use of USF in Tennessee, the request is to include the amount of support received for Fiscal Year 2010. In compliance with this request, Image Access, Inc. reports the amount of USF support the company has received year to date for Fiscal year 2010 in Study Area Code 299017 is indicated below:

- High Cost Support- \$0.00
- Low Income Support- \$206,732.53

2. How the funds were allocated

Image access passes all low income support to its qualifying Lifeline subscribers to reduce the monthly charges to eligible low income customers.

3. Number of Lines Being Served by UNEs and Resale, the type of switching, and the location of the switch.

As requested, Image Access reports the number of lines being served on UNEs and resale to be as indicated below:

- UNEs: 8
- Resale: 951

As the UNEs Image Access uses to provide service are obtained from the underlying incumbent LEC, Image Access is able to report that all switching is performed in a manner consistent with the switching performed by AT&T Tennessee for its own subscribers and the switch location is the same as the AT&T Tennessee switch locations.

THE COMPANY RESPECTFULLY SUBMITS THAT IS MEETS THE QUALIFICATIONS FOR
CONTINUED CERTIFICATION FOR STUDY AREA CODE 299017

The company respectfully submits that, given the number and nature of the requirements for support already in place, the Authority may lawfully and appropriately rely upon this self-certification by Image Access Inc. The requirements, procedures, and processes to which the Company adheres, as set forth above, provide the necessary and sufficient basis for the Authority to provide certification to USAC and the FCC, and to thereby ensure that the Company and its customers will not be deprived of the USF funding to which the Company and its customers are lawfully entitled to possess, even when that support is limited to the receipt of low income federal universal service support. Essentially, under the existing rules and procedures discussed above, the federal support funds available to the Company and other ETCs are, in fact an integral part of the recovery of expenditures incurred in the provision, maintenance, and upgrading of its provision of universal service. The processes described above constitute the receipt and utilization of low income federal universal support upon which the Company depends on to provide

quality telephone service and upon which its low-income subscribers depend on to obtain service at rates that are reasonably comparable to rates charged for similar services in urban areas. Furthermore, the Company attest, per the above certification, that it will use all federal universal support only for its intended purpose.

In many respects, the certification process is similar to the certification process, which the Authority uses in initial designation of eligible telecommunications carriers, thereby fulfilling its rights, as established by the Telecommunications Act of 1996, to designate a carrier as an ETC.

Accordingly the grant of this request for certification is consistent with past practice and procedure. The very same procedure and process undertaken by the Authority that is valid for designation of the eligibility to receive funds is also rationally valid as the basis for the necessary certification that the Company will use those funds, once received, for the purpose for which they are intended.

The Company, as discussed above and pursuant to the above certification, represents to the Authority that it adheres to and complies with all required processes, and that any expenditures of USF funds will be consistent with the applicable rules and foster the provision of facilities and services for which the funding is intended.

Please contact the undersigned or Kim Vinnett at (225) 329-2410 with any questions or if further information is required.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jim Dry", is written over the printed name.

Jim Dry
President

AFFIDAVIT

STATE OF LOUISIANA)
)
PARISH OF EAST)
Baton Rouge

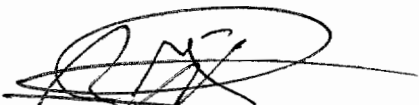
BEFORE ME, the undersigned authority appeared Jim Dry, who deposed and stated:

1. My Name is JIM DRY, I am employed by IMAGE ACCESS, INC. as its President. I am an officer of IMAGE ACCESS, INC. and am authorized to give this affidavit on behalf of IMAGE ACCESS, INC.
2. IMAGE ACCESS, INC. hereby certifies that is has used all federal high cost support it has received have been used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to Section 254(e) of the Telecommunications Act of 1996.



JIM DRY
PRESIDENT IMAGE ACCESS, INC.

Subscribed and sworn to before me this 23 day of August 2010.



NOTARY REPUBLIC # 50540
ROBERT G. GIANNARONE
My Commission Expires: FOR LIFE
(Notary Seal)