

# TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

September 27, 2010

Ms. Karen Majcher  
Vice President, High Cost & Low Income Division  
Universal Service Administration Company  
2000 L Street, NW – Suite 200  
Washington, D.C. 20036

RE: Pursuant to Federal Rule 54.314(a), October 1<sup>st</sup> Certification Requirement for High-Cost Universal Service Support, CC Docket No. 96-45.

Dear Ms. Majcher:

This letter is sent to certify that all eligible carriers subject to the jurisdiction of the Tennessee Regulatory Authority (“Authority”)<sup>1</sup> have provided self certification that federal high-cost support will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) of the Telecommunications Act. Support for which the eligible carriers are being certified include high-cost loop support, local switching support, high-cost support received pursuant to the purchase of exchanges, high-cost model support, hold harmless support and low-income support. No non-rural carriers in Tennessee are eligible to receive this support. A list of all eligible rural carriers under the jurisdiction of the Authority and the Study Area Code (“SAC”) for each follows:<sup>2</sup>

<u>State</u>	<u>SAC</u>	<u>Company Name</u>
TN	299013	Aeneas Communications, LLC
TN	290280	Ardmore Telephone Company, Inc.
TN	299001	Ben Lomand Communications, Inc.
TN	299007	Budget Phone, Inc.


<sup>1</sup> According to Tennessee statutes, telephone cooperatives are not subject to Authority jurisdiction; therefore, they are not being certified in this letter. It is our understanding that cooperatives must file appropriate certification directly with the FCC and USAC. Tennessee has ten (10) telephone cooperatives operating in the state.

<sup>2</sup> All the listed Tennessee rural incumbents have certified to the TRA that they are not disaggregating and are targeting high-cost support pursuant to 47 C.F.R. § 54.315(b) except Citizens Telecommunications Company of Tennessee, LLC. Citizens Telecommunications Company of Tennessee, LLC submitted its Disaggregation Plan to the TRA for approval pursuant to 47 C.F.R. § 54.315(c) in TRA Docket No. 04-00098. The TRA approved the plan on May 24, 2004.

<u>State</u>	<u>SAC</u>	<u>Company Name</u>
TN	290552	CenturyTel of Adamsville, Inc.
TN	290557	CenturyTel of Claiborne, Inc.
TN	290574	CenturyTel of Ooltewah-Collegedale, Inc.
TN	299008	Cinergy Communications Company
TN	290580	Citizens Telecommunications Company of the Volunteer State, LLC
TN	294336	Citizens Telecommunications Company of Tennessee, LLC
TN	290559	Concord Telephone Exchange
TN	290561	Crockett Telephone Company, Inc.
TN	290566	Humphreys County Telephone Company
TN	290570	Loretto Telephone Company, Inc.
TN	290571	Millington Telephone Company, Inc.
TN	290576	Peoples Telephone Company, Inc.
TN	290578	Tellico Telephone Company, Inc.
TN	290575	Tennessee Telephone Company
TN	290581	United Telephone Company
TN	290583	West Tennessee Telephone Company Inc.
TN	299014	Nexus Communication, Inc ( wire line service only)
TN	299017	Image Access, Inc. d/b/a New Phone (low-income only)
TN	299015	Tennessee Telephone Service, LLC d/b/a Freedom Communications USA, LLC

This filing is made pursuant to CC Docket 96-45.

Sincerely

  
 Eddie Roberson  
 Director

  
 Kenneth Hill  
 Director

  
 Sara Kyle  
 Director

# TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

September 27, 2010

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A306  
Washington, D.C. 20554

RE: Pursuant to Federal Rule 54.314(a), October 1<sup>st</sup> Certification Requirement for High-Cost Universal Service Support, CC Docket No. 96-45.

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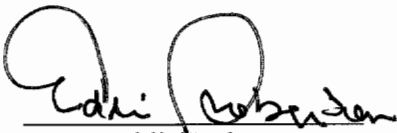
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 Director

  
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September 27, 2010

Ms. Karen Majcher  
Vice President, High Cost & Low Income  
Universal Service Administrative Company  
2000 L. Street N.W. – Suite 200  
Washington D.C. 20036

Subject: State Certification That Basic Service Rates In Rural, High-Cost Areas Served  
By Non-Rural Carriers Are Reasonably Comparable To The National Urban  
Rate Benchmark.

Dear Ms. Majcher:

This letter is sent as certification that rural rates for services provided by the non-rural carriers in Tennessee are reasonably comparable to the nationwide benchmark urban rate.

In October 2003, the Federal Communications Commission modified the high cost universal service support mechanism for non-rural carriers.<sup>1</sup> One of the modifications was that the certification process was expanded by requiring each state to provide information to the Commission regarding the comparability of the rates in rural areas served by non-rural carriers within the state to urban rates nationwide. To ensure comparability of the rural rates, the Commission established a “safe harbor” bench mark national urban rate<sup>2</sup> and determined that other relevant factors, such as poor service quality or limited calling areas, should also be considered.<sup>3</sup>

Pursuant to the Commission’s direction, the Tennessee Regulatory Authority (“Authority”) has reviewed the residential rates charged by the non-rural carrier in rural areas and found them to be below the “safe harbor” benchmark established by the Commission. In addition, the Authority has considered other relevant factors of service quality and the calling scopes associated with rates, and determined that the rate comparability is not limited by these factors.

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<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service, Order on Remand, Further Notice of Proposed Rulemaking and Memorandum Opinion and Order*, FCC 03-249 (October 27, 2003).

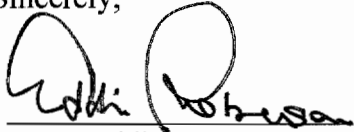
<sup>2</sup> *Id.*, ¶ 81.

<sup>3</sup> *Id.*, ¶ 90.

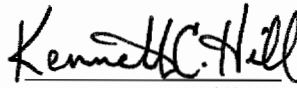
Accordingly, the Tennessee Regulatory Authority certifies that non-rural carrier rates for residential service in Tennessee's rural areas are reasonably comparable to the national urban rate benchmark.

This filing is made pursuant to CC Docket 96-45.

Sincerely,

Handwritten signature of Eddie Roberson in black ink.

Eddie Roberson  
Director

Handwritten signature of Kenneth Hill in black ink.

Kenneth Hill  
Director

Handwritten signature of Sara Kyle in black ink.

Sara Kyle  
Director

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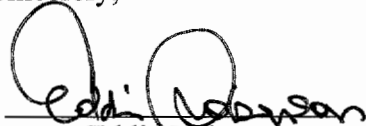
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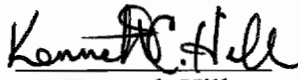
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This filing is made pursuant to CC Docket 96-45.

Sincerely,

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Eddie Roberson  
Director

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Kenneth Hill  
Director

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Sara Kyle  
Director