

August 5, 2011

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

RE: Eligible Telecommunications Carriers Self-Certification of Eligibility to Receive Rural Universal  
Service funds for Fiscal Year 2012  
TRA Docket No. 11-00101

Dear Mr. Foster:

Enclosed for filing in the above reference matter is Image Access, Inc. dba NewPhone's self-certification regarding the use of Universal Service Funds it receives as an eligible telecommunications carrier in the state of Tennessee. Image Access, Inc. dba NewPhone only received low cost reimbursements in 2010.

Also attached is a list of the areas (by county) where the company is providing service and the number of lines being served by UNEs and resale.

Please contact me if you have any questions or need additional information.

Sincerely yours,



Richard Jaubert  
Vice-President

**AFFIDAVIT**


STATE OF LOUISIANA

PARISH OF JEFFERSON

BEFORE ME, the undersigned authority, appeared Richard Jaubert, who deposed and said:

1. My name is Richard Jaubert. I am Vice President of Image Access, Inc. dba NewPhone. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Tennessee Regulatory Authority's certification as contemplated in 47 C.F.R. §54.314.
2. I have personal knowledge of the facts stated herein. I am competent to testify to the facts, which are stated to the best of my knowledge and recollection.
3. Image Access, Inc. dba NewPhone was designated an eligible telecommunications carrier by the Tennessee Regulatory ("TRA") in Docket Number 08-00143 dated July 8, 2009 and is eligible to receive universal service support pursuant to Section 254(e) of the Telecommunications Act of 1996("Act").
4. Image Access, Inc. dba NewPhone is a common carrier and provides all services and functionalities supported by the federal universal service program as set forth in Section 214(e) of the Act and 47 CFR Section 54.1(a) of the FCC's rules, throughout the service area for which it has ETC designation in Tennessee.
5. Image Access, Inc. dba NewPhone hereby certifies that it will only use the federal high-cost support it receives during 2012 for the provision, maintenance and upgrading of facilities and services for which support is intended pursuant to 47 U.S.C. § 254(e) of the Act.
6. Image Access, Inc. dba NewPhone's SAC number for the state of Tennessee is 143033140. Image Access, Inc. dba NewPhone received a total of \$288,116.70 in low income support for the fiscal year 2010 and will use these funds received as discounts for qualified customers.

FURTHER AFFIANT SAYETH NOT.

  
Richard Jaubert  
Vice-President

STATE OF LOUISIANA  
PARISH OF JEFFERSON

Acknowledged before me this 5<sup>th</sup> day of August, 2011, by Richard Jaubert, as Vice-President of Image Access, Inc. dba NewPhone who is personally known to me or produced identification and who did take an oath.

  
NOTARY PUBLIC

Louis Leo  
LA Bar No. 15007

My commission expires: For Life

**Image Access, Inc.**

Docket No. 11-00101

**TN Counties being served by Image Access, Inc.**

ANDERSON	KNOX
BEDFORD	LAKE
BENTON	LAUDERDALE
BLOUNT	LAWRENCE
BRADLEY	LEWIS
CAMPBELL	LINCOLN
CARROLL	LOUDON
CHEATHAM	MADISON
CHESTER	MARION
CLAIBORNE	MARSHALL
COCKE	MAURY
COFFEE	MC MINN
CROCKETT	MEIGS
DAVIDSON	MONROE
DICKSON	MONTGOMERY
DYER	OBION
FAYETTE	OUACHITA
FRANKLIN	POLK
GIBSON	RHEA
GILES	ROANE
GRAINGER	ROBERTSON
HAMBLEN	RUTHERFORD
HAMILTON	SEVIER
HANCOCK	SHELBY
HARDEMAN	SMITH
HARDIN	STEWART
HAWKINS	SUMNER
HAYWOOD	TIPTON
HENDERSON	TROUSDALE
HENRY	UNION
HICKMAN	WILLIAMSON
HUMPHREYS	WILSON
JEFFERSON	

As of 7/31/11, the number of lines being served by UNE's is 5 and resale is 1,707.