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November 2, 2011

**VIA ELECTRONIC FILING  
AND OVERNIGHT MAIL**

filed electronically in docket office on 11/02/11  
Docket No. 11-00186

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

Re: Tele Circuit Network Corporation  
ETC Designation

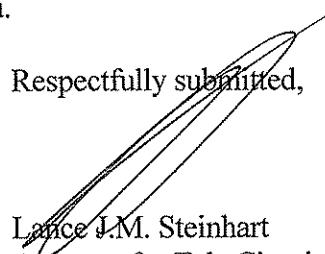
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of Tele Circuit Network Corporation'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 Tele Circuit Network Corporation

Enclosures  
cc: Ashar Syed

**BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSION**

<b>APPLICATION OF</b>	)	
<b>TELE CIRCUIT NETWORK CORPORATION</b>	)	
<b>FOR DESIGNATION AS AN ELIGIBLE</b>	)	<b>DOCKET NO.</b>
<b>TELECOMMUNICATIONS CARRIER</b>	)	

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

Tele Circuit Network Corporation ("Tele Circuit" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),<sup>2</sup> 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, Tele Circuit satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of Tele Circuit as an ETC in the Designated Service Area will serve the public interest. Accordingly, Tele Circuit respectfully requests that the Commission grant this Application.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 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. Tele Circuit is an Georgia Corporation<sup>3</sup>. 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 and Interexchange Telecommunications Services Within the State of Tennessee in Docket No. 08-00199 per Order issued on February 3, 2009. The principal office of the Applicant is located at 1815 Satellite Blvd., Ste. 504, Duluth, Georgia 30097. The telephone number of the Applicant is (877) 835-3247. The Applicant will provide local exchange and exchange access services in the Designated Service Area using either its own facilities or a combination of resale and unbundled network elements ("UNEs") obtained through agreements with AT&T of Tennessee that allow end-to-end switching and delivery of calls.

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

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<sup>3</sup> Tele Circuit was incorporated in the State of Georgia on October 30, 2002.

commission.”<sup>4</sup> Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.<sup>5</sup>

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.<sup>6</sup>

## **II. Tele Circuit Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area**

4. Tele Circuit is a common carrier as that term is defined in the Act.<sup>7</sup> The Applicant will provide the supported services in the Designated Service Area pursuant to Docket No. 08-00199 referenced above.

5. Tele Circuit will offer all of the supported services enumerated under Section 254(c). According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities (including UNEs) and resale of another carrier’s services.<sup>8</sup> Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

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

<sup>5</sup> 47 U.S.C. § 214(e)(1).

<sup>6</sup> *Id.*

<sup>7</sup> *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 . . .”).

<sup>8</sup> 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

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 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;

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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). Tele Circuit'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."

- 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, Tele Circuit 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.<sup>9</sup>

8. Tele Circuit 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.<sup>10</sup>

### **III. Area for Which ETC Designation Is Requested**

9. Tele Circuit will serve the AT&T Tennessee service area. Tele Circuit does not seek Designation as an ETC in any areas served by rural telephone companies.

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

<sup>10</sup> See 47 C.F.R. §§ 54.201(d)(2).

#### **IV. Granting Tele Circuit's Application Will Serve the Public Interest**

10. Congress requires that the Commission grant competitive ETC applications in non-rural areas.<sup>11</sup> No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.<sup>12</sup> Thus, the Act provides that the Commission "shall" designate Tele Circuit 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 Tele Circuit as an ETC will serve the public interest. A grant of the Company's application will serve the public interest and the market as a whole by promoting additional deployment of its unique pre-paid local service offering to the unserved and underserved exchanges in the Designated Service Area and will allow the Company to participate and offer Lifeline and Link-Up to qualifying consumers throughout these same exchanges. As relevant to the Commission's public interest inquiry, the Company's presence will undeniably include a benefit of increased customer choice, as its pre-paid service is unique, and serves a specific sector of the public who might well not otherwise be able to obtain wire line service from traditional providers.

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<sup>11</sup> See 47 U.S.C. 214(e)(2).

<sup>12</sup> See *Id.*



The unique advantages and disadvantages of the Company's service offering are as follows:

The services are offered to customers on a monthly basis. Services are provided without requiring a security deposit or gaining credit worthiness. Customers have the opportunity to choose products based on current needs and change products if necessary on a monthly basis without incurring large costly fees. The Company's long distance products are 1+800 based and provided thru a prepaid Long distance carrier which eliminates the billing of additional monthly fees. Services are provided on a monthly basis and can be discontinued simply by nonpayment of the next month's services without penalty or disconnection fees.

11. Tele Circuit 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 Tele Circuit's service. Tele Circuit advertises its services through several different media of general distribution including (but not limited to) marketing at targeted retail locations, as well as advertisements via television, radio and trade magazines. Since Tele Circuit's service is of particular interest to credit-challenged customers—many of whom are low income—who generally cannot obtain service from the incumbent carrier, the granting of ETC status is clearly in the public interest; access to Lifeline and Link-Up programs can be critically important to a significant portion of the eligible low income consumers. Applicant believes that Lifeline and Link-Up services are

not being sufficiently advertised and made available to eligible low income consumers in the Designated Service Area. Statistics suggest that there are many eligible customers who are not yet aware of the programs. According to the best data available to Applicant, as of December 31, 2010, only between 20-50 percent of consumers eligible for Lifeline Services in the State of Tennessee were being provided such services.<sup>13</sup> The FCC's own statistics show how additional efforts are needed to promote awareness of the programs. On September 14, 2009 the FCC noted how Lifeline and Link Up programs have been active for years but at least half of eligible consumers nationwide do not take advantage of this assistance.<sup>14</sup> When additional carriers enter the market with programs designed specifically for such customers, it increases the likelihood that eligible customers will become generally aware of these valuable options for telecommunications service.

Tele Circuit will provide universal service as an ETC in all of its Designated Service Area.

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

13. Tele Circuit 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).

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<sup>13</sup> See attached Exhibit 2, 2010 Lifeline Participation Rates by State, which was obtained from the Universal Service Administrative Company ("USAC"), an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the Federal Communications Commission (FCC). USAC administers Universal Service Fund (USF) programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries.

<sup>14</sup> Exhibit 2 includes the FCC's News Release.

14. Tele Circuit will provide equal access to interexchange service.

15. 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. This guideline has no application where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because Linkup 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. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, and is distributed on a per-household 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.

16. Applicant offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation. Applicant will offer a local usage plan with unlimited calling within the customer's local calling area for a flat monthly fee with the same calling scope as AT&T Tennessee.

17. 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.

18. 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.

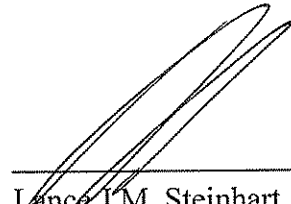
19. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated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

20. Applicant has been designated as an ETC in Florida and has a petition for ETC status pending in the State of Georgia.

**V. Relief Requested**

For the foregoing reasons, Tele Circuit 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 Tele Circuit Network Corporation

**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	CRHTNMA	CARTHAGE
TN	295185	BELL SOUTH	CRVLTNMA	COLLIERVILLE
TN	295185	BELL SOUTH	CULKTNMA	CULLEOKA
TN	295185	BELL SOUTH	CVTNTNMT	COVINGTON
TN	295185	BELL SOUTH	DCTRNTMT	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	DYTNTNMA	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	HUNTLAND
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	JELLICO
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	LFLTNNMA	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
TN	295185	BELL SOUTH	NSVLTNBV	NASHVILLE-BELLEVUE
TN	295185	BELL SOUTH	NSVLTNBW	NASHVILLE-BRENTWOOD
TN	295185	BELL SOUTH	NSVLTNCD	NASHVILLE-COCKRILL BEND
TN	295185	BELL SOUTH	NSVLTNCH	NASHVILLE-CRIEVE HALL
TN	295185	BELL SOUTH	NSVLTNDO	NASHVILLE-DONELSON
TN	295185	BELL SOUTH	NSVLTNHH	NASHVILLE-HICKORY HOLLOW
TN	295185	BELL SOUTH	NSVLTNIN	NASHVILLE-INGLEWOOD
TN	295185	BELL SOUTH	NSVLTNMC	NASHVILLE-MADISON

TN	295185	BELL SOUTH	NSVLTNMT	NASHVILLE-MAIN
TN	295185	BELL SOUTH	NSVLTNST	NASHVILLE-SHARONDALE
TN	295185	BELL SOUTH	NSVLTNUN	NASHVILLE-UNIVERSITY
TN	295185	BELL SOUTH	NSVLTNWC	NASHVILLE-WHITES CREEK
TN	295185	BELL SOUTH	NSVLTNWM	NASHVILLE-WESTMEADE
TN	295185	BELL SOUTH	NWBRTNMA	NEWBERN
TN	295185	BELL SOUTH	NWPTTNMT	NEWPORT-MAIN
TN	295185	BELL SOUTH	OKRGTNMT	OAK RIDGE
TN	295185	BELL SOUTH	OLHCTNMA	OLD HICKORY
TN	295185	BELL SOUTH	OLSPTNMA	OLIVER SPRINGS
TN	295185	BELL SOUTH	PARSTNMA	PARIS
TN	295185	BELL SOUTH	PLMYTNMA	PALMYRA
TN	295185	BELL SOUTH	PLSKTNMA	PULASKI
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

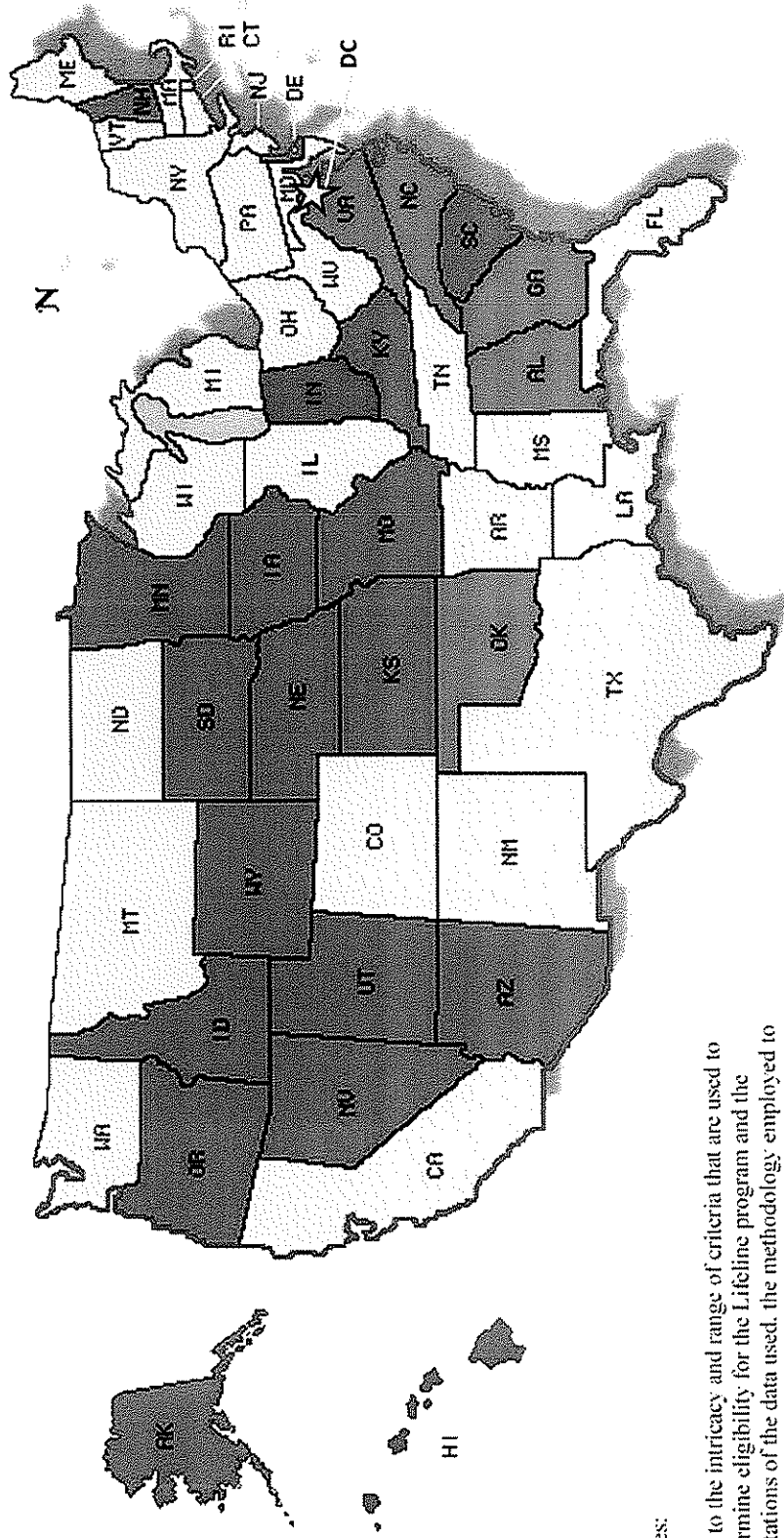
TN	295185	BELL SOUTH	SVNHTNMT	SAVANNAH
TN	295185	BELL SOUTH	SVVLTNMT	SEVIERVILLE
TN	295185	BELL SOUTH	SWTWTNMT	SWEETWATER
TN	295185	BELL SOUTH	TLLHTNMA	TULLAHOMA
TN	295185	BELL SOUTH	TPVLTNMA	TIPTONVILLE
TN	295185	BELL SOUTH	TRINTNMA	TRIUNE
TN	295185	BELL SOUTH	TROYTNMT	TROY
TN	295185	BELL SOUTH	TRTNTNMA	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

## **Exhibit 2**

### **2010 Lifeline Participation Rates by State and FCC News Release**

# 2010 Lifeline Participation Rates by State

- Below 10%
- 10% - 20%
- 20% - 50%
- Above 50%



## Notes:

Due to the intricacy and range of criteria that are used to determine eligibility for the Lifeline program and the limitations of the data used, the methodology employed to create this map involves several estimates, assumptions, simplifications, and omissions. Therefore, the rates generated on this map should be treated as estimates only.



# NEWS

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D. C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action.  
See *MOI v. FCC*, 515 F.2d 385 (D.C. Cir. 1974).

FOR IMMEDIATE RELEASE:  
September 14, 2009

NEWS MEDIA CONTACT:  
Rosemary Kimball (202) 418-0511  
Email: [rosemary.kimball@fcc.gov](mailto:rosemary.kimball@fcc.gov)

## FCC SUPPORTS "NATIONAL LIFELINE AND LINK UP TELEPHONE DISCOUNT AWARENESS WEEK" - SEPTEMBER 14 - 20, 2009

WASHINGTON, DC -- Today, the Federal Communications Commission (FCC) joined the effort to call attention to the "National Lifeline and Link Up Telephone Discount Awareness Week," which takes place September 14 - 20, 2009. Various state and local agencies throughout the country will be participating with outreach activities and events. The "Lifeline" and "Link Up" programs provide financial assistance to low-income consumers in connecting a residential phone line and paying their monthly bill. The programs have been active for years and are administered by the FCC and state public utility commissions, but at least half of eligible consumers nationwide do not take advantage of this assistance.

"Lifeline" involves discounts on monthly charges for a primary residential telephone line, including wireless service. "Link Up" involves a discount on the cost of initiating the primary telephone service for a residence, including the activation of a wireless phone that serves as the primary residential telephone. The discounts are available throughout the country, including an enhanced discount on Tribal lands. In general, consumers at or below 135% of the federal poverty guidelines, or who participate in one or more of a number of other assistance programs, are eligible for Lifeline and Link Up.

To help call attention to the availability of these programs, the FCC joins the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA), and urges government agencies and non-profit organizations to help disseminate information on Lifeline and Link Up to their constituents. More information about the programs and how to apply is available at [www.lifeline.gov](http://www.lifeline.gov) or <http://www.usac.org/li/low-income/apply-for-support.aspx>.

-- FCC --

State of Georgia

County of Gwinnett

)  
)  
)

**VERIFICATION OF APPLICANT**

I, Ashar Syed, Chief Executive Officer of Tele Circuit Network Corporation, 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.

  
\_\_\_\_\_  
Ashar Syed, Chief Executive Officer  
Tele Circuit Network Corporation

Subscribed and sworn to before me, a Notary Public, this 21 day of October 2011.



  
\_\_\_\_\_  
(Signature of person authorized to administer oath)

My Commission Expires: 1-17-2012



002475

**TELE CIRCUIT NETWORK CORP**

1815 SATELLITE BLVD STE 504  
DULUTH, GA 30097-5239  
PH 1-877-835-3247

**SUNTRUST BANK**  
ACH RT 061000104  
64-10/610

10.25.2011.

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ORDER OF

TENNESSEE REGULATORY AUTHORITY

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DOLLARS

FOR TENNESSEE (ETC).

ME,

MP

⑈002475⑈ ⑆061000104⑆1000037760765⑈