

BASS

BERRY • SIMS_{PLC}

150 Third Avenue South, Suite 2800
Nashville, TN 37201
(615) 742-6200

David Killion
PHONE: (615) 742-7718
FAX: (615) 742-0414
E-MAIL: dkillion@bassberry.com

December 12, 2011

VIA HAND DELIVERY

FILED ELECTRONICALLY IN DOCKET OFFICE ON 12/12/11

Chairman Kenneth C. Hill
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: **Docket No. 11-00208**: ***Application of United Telephone Company, on Behalf of Itself and Its Wholly Owned Subsidiary, UTC Video Concepts, LLC, for a State-Issued Certificate of Franchise Authority***

Dear Chairman Hill:

Enclosed please find five (5) copies of the Application of United Telephone Company, on behalf of itself and its wholly owned subsidiary, UTC Video Concepts, LLC, for a State-Issued Certificate of Franchise Authority. Also enclosed is a check for the Application's \$1,000 filing fee.

Please file the original and four copies of this material and stamp the additional copy as "filed." Then please return the stamped copy to me by way of our courier.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

Sincerely,



David Killion

Enclosures

cc: Mr. Jerry Kettles, Chief of Economic Analysis & Policy Division (w/o enclosure)
Mr. William H. Bradford

10356752.1

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**UNITED TELEPHONE COMPANY, ON
BEHALF OF ITSELF AND ITS WHOLLY
OWNED SUBSIDIARY, UTC VIDEO
CONCEPTS, LLC, FOR A STATE-
ISSUED CERTIFICATE OF FRANCHISE
AUTHORITY.**

Docket No. _____

AFFIDAVIT OF WILLIAM H. BRADFORD

STATE OF TENNESSEE)
)
COUNTY OF MARSHALL)

I, William H. Bradford, in accordance with the requirements of the Tennessee Competitive Cable and Video Services Act, Tenn. Code Ann. § 7-59-301 et seq. (the "Act"), states as follows:

I am an employee of United Telephone Company, where my title is President & CEO. As such, I am authorized to make this affidavit on behalf of Applicant United Telephone Company and its wholly owned subsidiary, UTC Video Concepts, LLC.

1. Name of Applicant

United Telephone Company, on behalf of itself and its wholly owned subsidiary UTC Video Concepts, LLC (hereinafter collectively referred to as "Applicant").

2. Application Fee for Service Area Population of 50,000, up to and including 100,000 (Section 305(b)(1) of the Act)

An application fee of \$1,000 is submitted with this application consistent with Section 305(b)(1) of the Act and based on the population of service area(s) as reflected in the most recent decennial census applied for in this application. Such service areas are described in Exhibit A.

3. Compliance with Applicable Laws (Section 305(c)(1) of the Act)

Applicant agrees to comply with all applicable federal and state laws and regulations to the extent that such state laws and regulations are not in conflict with or superseded by the provisions of this part or other applicable law and will timely file with the FCC all forms required by the FCC in advance of offering video services or cable services. Applicant will

comply with all applicable FCC requirements involving the distribution and notification of emergency messages over the emergency alert system consistent with the enforcement of the rules, and any waivers to the rules, as determined by the FCC.

**4. Description of Municipalities and Unincorporated Areas to be Served
(Section 305(c)(2) of the Act)**

Exhibit A to this application lists the municipalities and unincorporated areas within counties to be served, in whole or in part, by the Applicant. Applicant intends to provide cable or video services in the same geographical areas in which it provides incumbent regulated telephone services. Exhibit A is incorporated by reference into this Affidavit

5. Intent to Begin to Offer Cable or Broadband Internet Service (Section 305(c)(3) of the Act)

Applicant already provides broadband internet and local telephone services in each of the municipalities and unincorporated areas within counties identified in Exhibit A and intends to begin to offer cable service for purchase within twenty-four (24) months of the date of issuance of a state-issued certificate of franchising authority.

6. Indemnification (Section 305(c)(4) of the Act)

Applicant agrees to indemnify and hold harmless, in accordance with Section 318 of the Act, the state, municipality, county and any employee or representative of the state, municipality or county, as well as any political subdivision of the state and any employee or representative of the political subdivision, individually and collectively, referred to in Section 318 of the Act as the "indemnatee."

7. Applicant Contact Information (Section 305(c)(5) of the Act)

- a. Applicant's principal place of business is located at 120 Taylor Street, P.O. Box 38, Chapel Hill, TN 37034.
- b. Contact telephone number is (931) 364-2289.
- c. The principal executive officers of the Applicant are as follows:

United Telephone Company
William H. Bradford, President & CEO
Cindy Rothstein, Accounting Manager

UTC Video Concepts, LLC
William H. Bradford, President & CEO

d. The following persons are authorized to represent the Applicant before the Tennessee Regulatory Authority:

- i. William H. Bradford
- ii. R. Dale Grimes, Legal Counsel
- iii. C. David Killion, Legal Counsel

8. Applicant Has the Managerial, Financial, and Technical Qualifications to Provide Cable Service (Sections 305(c)(6) and 305(d)(2) of the Act)

Applicant has the managerial, financial and technical qualifications to provide cable or video service as required by Tenn. Code Ann. § 7-59-305(c)(6) and (d)(2). Applicant has evaluated its deployment plans and reasonably concludes that its plans will result in deployment of cable or video service to all service areas listed on Exhibit A within the time periods set forth in Tenn. Code Ann. § 7-59-311. Applicant agrees to comply with the non-discrimination and service deployment requirements of 7-59-311.

Applicant has the managerial, financial and technical qualifications to fulfill this plan of deployment. United Telephone Company is a certificated provider in the State of Tennessee. Accordingly, the Authority has determined that Applicant has the managerial, financial, and technical qualifications to provide local telephone service. Based on Applicant's experience and success providing telecommunications services, United Telephone Company and its wholly-owned subsidiary UTC Video Concepts, LLC have the managerial, financial, and technical qualifications to provide similar cable and video services.

1. Managerial Qualifications: Applicant has been providing telecommunications services in Tennessee since 1947, primarily to Tennesseans in the seven (7) Tennessee counties serviced by Applicant, namely Bedford, Davidson, Franklin, Marshall, Moore, Rutherford and Williamson Counties. As a result of over 60 years of local service, Applicant knows its customers well and has the valuable experience as a telecommunications provider necessary to begin providing video and cable services.

United Telephone Company maintains its headquarters in Chapel Hill, Tennessee and already operates experienced local customer service and installer/repair departments that provide exceptional customer experiences in delivering advanced broadband and communications services. Further, Applicant's employees already utilize coordinated back office systems necessary that can easily be expanded to add video and cable services to the product portfolio. Accordingly, Applicant's employees are already trained and experienced on the back office systems necessary to provide new video and cable services, resolve service and repair issues, and handle billing inquiries in an efficient and timely manner.

Applicant is managerially qualified to provide cable and video services in its proposed service area. Applicant is currently managed by William H. Bradford, President & CEO, and he is supported by highly qualified and competent directors and staff. Attached hereto as Exhibit B is a list of the names of Applicant's principal company officers and staff and a description of each officer's and staff member's background and experience. As shown in Exhibit B,

Applicant's staff has substantial managerial experience in the areas of utility operations, utility customer service and utility marketing. Further, all but one of the members of the management team have prior experience in the video and cable services sector.

2. Financial Qualifications: Applicant as been meeting the requirements of a financially stable regulated utility in the state of Tennessee for over sixty years. Throughout this time Applicant has filed annual financial and operating reports reflecting its ability to continue to invest in its network, pay-off debt, and build cash, which are all important aspects of a healthy company. Applicant's annual reports are on file with the Authority. Accordingly, Applicant has a proven history of being financially qualified to provide cable and video services.

3. Technical Qualifications: Based in part on its experience since 1947 as a telecommunications services provider, coupled with its demonstrated managerial experience, Applicant possesses the necessary technical qualifications to provide cable and video services. As noted earlier herein, Applicant has successfully serviced its telecommunications customers since 1947. Employees of UTC Video Concepts, LLC are also employees of United Telephone Company. United Telephone Company has been providing broadband services for over 15 years; therefore, the technical staff and senior management team have extensive broadband experience.

Information concerning the technical expertise of Applicant's senior management team is included in Exhibit B. This experience provides Applicant with the foundation necessary to provide the proposed cable and video services. While Applicant believes that it has sufficient technical expertise to provide these and other broadband services, Applicant also has access to various technical consultants on whom it may call if the need arises.

9. Customer Service Complaint Handling Process (Section 305(c)(7) of the Act)

- a. Policies on addressing customer service issues, billing adjustments and communications with government officials regarding customer complaints:

United has a staff of over forty dedicated local employees and has provided service and quality customer care in the areas on Exhibit A for over 50 years. As such, subscribers who have questions or complaints regarding their subscriptions to United's services may continue to contact United by writing to United Telephone, 120 Taylor Street, P.O. Box 38, Chapel Hill, TN 37034, by visiting our web site at: <http://www.united.net>, or by contacting the toll-free number listed below and included on all billing statements. United will continue to address customer questions or complaints in a timely manner. Should a customer believe that his/her request was not properly handled, he/she may contact the Tennessee Regulatory Authority.

Local or toll-free telephone number at which a customer may contact applicant:

10. Notice to Affected Local Governing Authority (Section 305(c)(8) of the Act)

Notice has been provided to the affected local governing authorities at the addresses set forth in Exhibit C of their right to receive a franchise fee consistent with the Act. Notice will also be provided to other entities with facilities in the rights-of-way consistent with any non-discriminatory and generally applicable local ordinances or resolutions requiring such notice.

**11. Non-Discrimination and Service Deployment Requirements
(Section 305(c)(9) of the Act)**

Applicant agrees to comply with the requirements of the Act, expressly including the applicable non-discrimination and service deployment requirements of Section 311 of the Act. In addition, the Applicant acknowledges the provisions of Section 312 of the Act relative to enforcement of non-discrimination and deployment requirements.

**12. Notice to Local Governing Authority Prior to Providing Service
(Section 305(c)(10) of the Act)**

Following issuance of the State-issued certificate of franchise authority, Applicant will provide notice to an affected local governing authority at least ten (10) days prior to providing service in that jurisdiction.

13. Minority Owned Business Participation Plan (Section 305(c)(11) of the Act)

Exhibit D to this Application is Applicant's Minority Owned Business Participation Plan and Applicant agrees to comply with the provisions of the Plan in accordance with Section 313 of the Act and is incorporated by reference into this Affidavit.

FURTHER AFFIANT SAYETH NOT

William H. Bradford
William H. Bradford, President & CEO

Sworn to and subscribed before me, this 9 day of December, 2011.

Cindy D. Autry

Notary Public

My Commission Expires: July 30, 2012

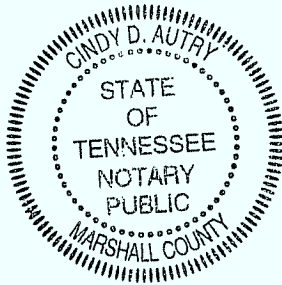


EXHIBIT A

DESCRIPTION OF MUNICIPALITIES AND UNINCORPORATED AREAS TO BE SERVED

Proposed Franchise Service Areas: Incorporated

(Within United Telephone Company Footprint Only)

Service Area / City	County
Brentwood	Williamson
Chapel Hill	Marshall
Estill Springs	Franklin
Nolensville	Davidson/Williamson

Proposed Franchise Service Areas: Unincorporated

(Within United Telephone Company Footprint Only)

Bedford County

Davidson County

Franklin County

Marshall County

Moore County

Rutherford County

Williamson County

EXHIBIT B

BIOGRAPHIES OF KEY MANAGEMENT EMPLOYEES

William Bradford, President & Chief Executive Officer:

Mr. Bradford is a telecommunications management executive with broad expertise, including direct industry experience acquiring and operating cable television and telephone operations. William spent 7 years at FairPoint Communications, Inc., where he served as the Vice President of Corporate Development, reporting directly to Gene Johnson (biography below). Collectively Mr. Bradford and Mr. Johnson have held executive and ownership positions in 35 independent telephone companies and 7 cable television providers, equipping them with pertinent managerial and technical expertise necessary to help make United a successful video and cable service provider. Mr. Bradford has been responsible for all aspects of strategic operations during his career, including: (1) development of bundled pricing and marketing plans; (2) increasing penetration of video, broadband and long distance products; (3) acquisitions of wireless ISPs to increase broadband service territory; (4) managing vendor selection for IP Softswitches, video equipment, and set-top boxes; (5) margin enhancement strategies for broadband products; and (6) managing employees through cultural change. Mr. Bradford has been an active participant in state and federal industry associations and is a frequent speaker on the state of M&A and the Industry. Mr. Bradford graduated cum laude from Wake Forest University, with a degree in Mathematical Economics.

Gene Johnson, Chairman:

Mr. Johnson previously owned a cable television construction company and later became head of the mergers & acquisitions group of Cable Investments, Inc., where he executed on a broad array of transaction in the cable television industry. Mr. Johnson is the retired Chairman and Chief Executive Officer of FairPoint Communications, Inc., the parent company for 32 independent telephone companies and 5 cable television companies. Mr. Johnson co-founded FairPoint in 1990 and was chief executive officer from January 2002 until his retirement in June, 2009. A former captain in the U.S. Army, Mr. Johnson started his career as a certified public accountant. Today Mr. Johnson serves as chairman of the board of trustees for the University of North Carolina at Charlotte.

Mark Feidler, Board Member:

Mr. Feidler began his career by gaining M&A / transactional experience before transitioning into various telecommunications executive-level positions. From 1991 to 2000, Mr. Feidler served as the head of corporate development for BellSouth and as President of various operating subsidiaries. In 2000 when BellSouth and AT&T (formerly SBC) merged their domestic wireless operations to form Cingular Wireless Mr. Feidler became the COO of Cingular Wireless. In 2003 Mr. Feidler became President and COO of BellSouth Corporation and served the company in that capacity until its merger with AT&T in December 2006. Mr. Feidler joined MSouth Equity Partners in 2007 as a Partner and co-founder. MSouth Equity Partners is a private equity investment firm that provides equity capital and expertise to support management teams in acquisitions and recapitalizations of companies typically valued at \$25 – \$125 million.

Ronnie Burton, Network Operations Manager:

Mr. Burton is responsible for all aspects of network operations, including the maintenance and expansion of United's 400 mile advanced fiber-optic core network. Mr. Burton has over 40 years of

telecommunications experience and has been with United since 1993. Previously Mr. Burton worked for Stromberg-Carlson/Siemens, a leading network infrastructure provider, from 1971 to 1993, where he was responsible for managing over 600,000 lines in-service in Bellsouth territory alone. Mr. Burton has prior experience deploying video networks utilizing IPTV technology.

Jeff Fatovic, Manager of Outside Plant Engineering:

Mr. Fatovic leads a staff of two in-house engineers, two drafters and multiple construction crews. He is responsible for engineering, building, and repairing United's extensive fiber and copper networks. Mr. Fatovic has 34 years of telecommunications experience, including 5 1/2 years in his current role at United. Previously Mr. Fatovic worked as an engineering consultant to several different ILECs and was employed by Ameritech and BellSouth. Mr. Fatovic has extensive experience engineering and constructing Fiber to the Premise (FTTP) for the provisioning of video networks.

Cheryl Bowman, Customer Service Manager/Video Programming Manager:

Mrs. Bowman leads a staff of 5 in-house customer service representatives and has been with United since 1995. Mrs. Bowman implemented United's new customer service and provisioning back-office system in 2008 that currently supports United's telephone and broadband services and will also be utilized to support the launch of video and cable services. From 1985 to 1995, Mrs. Bowman held various positions in sales and customer service in middle Tennessee. Mrs. Bowman has prior experience negotiating with video content (programming) providers, including direct prior experience working with all of the local Nashville stations. Mrs. Bowman will lead United's efforts in negotiating and maintaining retransmission and programming agreements necessary to offer video and cable services to United's customers.

Cindy Rothstein, Accounting Manager:

Mrs. Rothstein leads a staff of 5 local employees responsible for the accounting and billing functions of the company. Mrs. Rothstein currently interfaces with the TRA staff on behalf of United Telephone and completes many of the monthly and annual reports necessary to comply with the laws and regulations of the State of Tennessee, the FCC, and the RUS. In 2008, Mrs. Rothstein led the implementation of a new billing and accounting system that currently supports United's telephone and broadband services and will be utilized for accounting and billing functions for the new video and cable services. Previously Mrs. Rothstein worked as a staff accountant for Loretto Telephone Company where she performed similar duties. Mrs. Rothstein has worked in the telecommunication industry for 15 years. She graduated cum laude from Athens State University, with a degree in Accounting. Mrs. Rothstein is currently completing her Certified Public Accounting licensure.

Donnie Glasscock, Outside Plant Manager:

Mr. Glasscock is responsible for: 1) managing installers and technicians on a daily basis according to the work load; 2) ensuring all service orders and trouble reports are resolved in a timely manner; and 3) meeting with and talking to customers regarding service troubles and future needs. Mr. Glasscock has been with United since October 1969, and has expansive knowledge of United's service territory and customers. Most importantly, Mr. Glasscock manages a staff of 15 local installers and technicians (3 with prior cable and video experience) who have been responsible for exceeding customer expectations

in the installation and repair of telephone and broadband services. Mr. Glasscock and his staff will also be responsible for the installation and repair of video and cable services.

Jaimy Cooper, Network Engineer:

Mr. Cooper has been with United since 2005 and is responsible for the design, management, and optimization of the IP network for the Company. This includes the deployment of IPTV services from the network to the customer premise via XDSL and FTTH technologies. Mr. Cooper was directly involved in the very first deployment of IPTV over FTTH for United in 2005 and was directly involved in the installation, provisioning, and management of the middleware platform as well as other servers/services such as DNS, DHCP and set-top box testing and provisioning. Previously, Mr. Cooper worked for Spirit Telecom, where he gained relevant experience as a network engineer supporting numerous independent telephone companies with achieving network optimization to support multiple services such as cable and video services (IPTV), Broadband, and VOIP.

Randy Corley, Network Engineer:

Mr. Corley has been with United since 1979 and is responsible for the design, management and optimization of the IP and ATM network for the company. This includes deployment of IPTV services from the network to the customer's premise via XDSL and FTTH technologies. Mr. Corley was previously involved in the deployment of ATM video services from 2002-2006 and the first deployment of IPTV over FTTH technology. Mr. Corley has been responsible for the design, management and deployment of ATM networks, EAS systems, local channels, and cable bridge systems. Previously, Mr. Corley worked for Dekalb Telephone Company, where he gained relevant experience in communications network management.

Tommy Welch, Information Systems Administrator:

Mr. Welch is responsible for implementing and maintaining the back-office systems necessary to support United's current telephone and broadband service offerings that will also be utilized to support the offering of video and cable services. Mr. Welch has been with United since June of 1996. Previously Mr. Welch worked for Paragould City Light, Water and City Cable (PCLW), where he gained relevant experience as PCLW designed and built a cable delivery system. Mr. Welch was responsible for customer billing, record keeping and tying all existing computer systems to the new cable software.

EXHIBIT C

NOTICE OF RIGHT TO RECEIVE FRANCHISE FEE

Paul	Webb	Mayor	City of Brentwood	PO Box 788	Brentwood	TN	37024
Carl	Cooper	Mayor	Town of Chapel Hill	PO Box 157	Chapel Hill	TN	37034
Tony	DeMatteo	Mayor	Estill Springs City Hall	PO Drawer 100	Estill Springs	TN	37330
Jimmy	Alexander	Mayor	City of Nolensville	705 Stonebrook Blvd, PO Box 547	Nolensville	TN	37135
Eugene	Ray	County Mayor	Bedford County	One Public Square, Suite 101	Shelbyville	TN	37160
Karl	Dean	Mayor	Davidson County	100 Metro Courthouse	Nashville	TN	37201
Richard	Stewart	Mayor	Franklin County	1 South Jefferson Street	Winchester	TN	37398
Joe Boyd	Liggett	County Mayor	Marshall County	1108 Courthouse Annex	Lewisburg	TN	37091
Peggy	Gattis	County Mayor	Moore County	PO Box 206	Lynchburg	TN	37352
Ernest	Burgess	County Mayor	Rutherford County	County Courthouse, Room 1010	Murfreesboro	TN	37130
Rogers	Anderson	County Mayor	Williamson County	1320 West Main Street, Suite 125	Franklin	TN	37064

EXHIBIT D

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN**

(see attached plan)

UNITED TELEPHONE COMPANY
And
UTC VIDEO CONCEPTS, LLC
Chapel Hill, Tennessee

TENNESSEE

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN

SUBMITTED TO THE
TENNESSEE REGULATORY AUTHORITY

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN

TABLE OF CONTENTS

1.0	PURPOSE
2.0	DEFINITIONS
3.0	PLAN RESPONSIBILITY AND POLICY STATEMENT
4.0	PLAN PERIOD OF EFFECTIVENESS
5.0	PLAN ADMINISTRATION
6.0	PLAN TO ENSURE EQUITABLE OPPORTUNITY
7.0	PLAN REPORTING

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN

1.0 PLAN

- 1.1 This Small and Minority-Owned Telecommunications Business Participation Plan (Plan) is submitted by United Telephone Company as required by Section 16 of the Tennessee Telecommunications Act of 1995, now codified as T.C.A. § 65-5-112.
- 1.2 The Administration of this Plan is the responsibility of United Telephone Company. It is the policy of United Telephone Company to provide an opportunity for Small Business, and Minority Businesses to compete for subcontracts awarded by United Telephone on a fair and equitable basis with Telecommunications suppliers and contractors.

2.0 DEFINITIONS

- 2.1 Small Business – For the purpose of this Plan, “small business” means a business with annual gross receipts of less than four million dollars (\$4,000,000) per T.C.A. § 65-5-112.
- 2.2 Minority Business – For the purpose of this Plan, “minority business” means a business that is solely owned, or at least fifty-one (51%) of the assets or outstanding stock of which is owned by an individual who personally manages and controls the daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000) per T.C.A. § 65-5-112.
- 2.3 United Telephone Company – For the purpose of this Plan, “United Telephone Company” includes both United Telephone Company and its wholly-owned subsidiary, UTC Video Concepts, LLC.

3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

- 3.1 It is the policy of United Telephone Company to afford Small and Minority-Owned Telecommunications Businesses and opportunity to participate in the performance of contracts in accordance with T.C.A. § 65-5-112.
- 3.2 As a purchaser of goods and services, it is United Telephone’s responsibility to:
 - Identify and maintain a pool of qualified Telecommunications suppliers.
 - Provide opportunities for Small and Minority-Owned Telecommunications Businesses to bid in those solicitations for products or services which they are capable of providing and which meet RUS (Rural Utilities Service) standards.

4.0 PLAN PERIOD OF EFFECTIVENESS

- 4.1 United Telephone Company is committed to providing affirmative access to contracting opportunities for Small and Minority-Owned Telecommunications Businesses. United Telephone Company is proactive and will move toward inclusion of such firms in the supplier base. This plan represents an on-going commitment by the Company, and has no fixed time period for effectiveness.

5.0 PLAN ADMINISTRATION

5.1 United Telephone Company's Plan Administrator is:

Mr. William Bradford
President & CEO
120 Taylor Street
P. O. Box 38
Chapel Hill, Tennessee 37034
Telephone: 931/364-4355 Fax: 931/364-7202

5.2 The Administrator manages the Plan as described below.

5.3 The Administrator's specific job duties, as they relate to this Plan are as follows:

- (a) Develops and maintains a Supplier Master List, which is a listing of Small and Minority-Owned Telecommunications Businesses who are deemed eligible to be suppliers for United Telephone Company.
- (b) Establishes and maintains policies and procedures to ensure that Small and Minority-Owned Telecommunications Businesses have an equitable opportunity to be awarded contracts.
- (c) Ensures inclusion of Small and Minority-Owned Telecommunications Businesses in those solicitations for products or services which they are capable of providing, and which meet RUS standards.
- (d) Ensures that United Telephone Company documents its reasons for not awarding contracts in response to the bids submitted by Small and Minority-Owned Telecommunications Businesses.
- (e) Maintains Small and Minority-Owned Telecommunications Businesses related correspondence and record keeping.
- (f) Coordinates activities during the conduct of any compliance review by the Tennessee state agencies.
- (g) Attends or arranges for attendance by appropriate members of management of Small Business workshops, Minority Business Enterprise Seminars, Trade Fairs, and Conventions.
- (h) Reviews performance on Small and Minority-Owned Telecommunications Businesses contracting.
- (i) Prepares and submits periodic contracting reports as necessary.

6.0 PLAN TO ENSURE EQUITABLE OPPORTUNITY

6.1 The Administrator shall ensure that appropriate source listings and services are properly utilized in support of the Plan. Sources/listings include, but are not limited to the following:

- (a) The United Telephone Company approved Master Supplier List.
- (b) Information received from the Small Business Administration Procurement Automated Source System (PASS).

- (c) Information sources received from the TN Department of Economic Development's Office of Minority Business Enterprise and Small Business Office.
- (d) Information received from the local Chamber of Commerce.

6.2 Outreach efforts will be made as follows:

- (a) The Administrator shall cultivate and maintain relationships with Small Business trade associations and business development organizations in an effort to locate and qualify capable Small and Minority-Owned Telecommunications Businesses for participation in contracting opportunities.
- (b) The Administrator shall ensure that United Telephone Company assists Small and Minority-Owned Telecommunications Businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns.
- (c) The Administrator shall ensure that United Telephone Company provides adequate and timely consideration of the potentialities of Small and Minority-Owned Telecommunications Businesses in "make or buy" decisions.
- (d) Appropriate members of management will attend seminars and trade fairs in order to develop sources.

7.0 PLAN REPORTING

- 7.1 United Telephone Company will submit such periodic reports and cooperate in those studies or surveys as may be required to determine the extent of compliance with this Plan.
- 7.2 United Telephone Company will maintain, if required, the following types of records:
 - (a) Source lists, guides, and other data that identify Small and Minority-Owned Telecommunications Businesses.
 - (b) Lists of organizations contacted in an attempt to locate sources that are Small and Minority-Owned Telecommunications Businesses.
 - (c) Records of any outreach efforts to contact trade associations, business development organizations, and conferences and trade fairs attended.
- 7.3 United Telephone Company's Supplier Master List identifies Small and Minority-Owned Telecommunications Businesses. The Supplier List shall be utilized in identifying potential contractors. A Summary Sheet shall be maintained in each supplier's file and shall be reviewed and evaluated by the Plan Administrator.