

# TENNESSEE REGULATORY AUTHORITY



September 26, 2012

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460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

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.

Dear Ms. Dortch:

This letter is sent to certify that BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ("AT&T Tennessee") has 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 of 1996. Support, for which AT&T Tennessee is being certified for years 2011 and 2013, includes Interstate Access Support (IAS) within Study Area Code (SAC) 295185.

Until the FCC issued its USF/ICC Transformation Order (17 FCC Rcd 17663) in November 2011, AT&T Tennessee submitted certifications directly to the FCC, and not to the Tennessee Regulatory Authority ("Authority"), because it only received Interstate Access Support (IAS).

At the same time, the FCC expanded the state certification requirements to require state Commissions to include even carriers that only receive IAS support, which the FCC now calls "frozen support", in their annual certifications to the FCC.

Accordingly, AT&T Tennessee submitted the proper self-certification documentation to the Authority and is in compliance with 47 U.S.C. § 254(e).

Sincerely,

Chairman Kenneth C. Hill