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December 20, 2012

VIA EMAIL TO sharla.dillon@tn.gov
AND OVERNIGHT MAIL

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

*filed electronically in the
docket office on 12/20/2012

Docket 12-00155

Re: YMax Communications Corp.
ETC Designation


Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of YMax Communications Corp.'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.

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
Lance J.M. Steinhart, P.C.
Attorneys for YMax Communications Corp.

Enclosures
cc: Shelby Ramsey

BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSON

APPLICATION OF)	
YMAX COMMUNICATIONS CORP.)	
FOR DESIGNATION AS AN ELIGIBLE)	DOCKET NO.
TELECOMMUNICATIONS CARRIER)	

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

YMax Communications Corp. ("YMAX" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),² 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 Tennessee service territory (the "Designated Service Area") for the purpose of receiving federal universal service support. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, YMAX satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area, including the new requirements outlined in the FCC's *Lifeline and Link Up Reform Order*.³ Furthermore, designation of YMAX as an ETC in the Designated Service Area will serve the public interest. Accordingly, YMAX respectfully requests that the Commission grant this Application.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

All correspondence, communications, pleadings, notices, orders and decisions relating to this

Application should be addressed to:

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I. Background

1. YMAX is an Delaware Corporation⁴. A copy of the Applicant's Certificate of Incorporation is on file with the Commission and incorporated herein by reference. The Applicant was granted a Certificate of Public Convenience and Necessity ("CCN") to Provide Competing Local Exchange Telecommunications Services Within the State of Tennessee in Docket No. 06-00067 per Order issued on September 18, 2006. The principal office of the Applicant is located at 5700 Georgia Ave, West Palm Beach, Florida 33405. The telephone number of the Applicant is (561) 586-3380. The Applicant will provide local exchange services in the Designated Service Area using its own facilities.

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

⁴ YMAX was incorporated in the State of Delaware on May 24, 2005.

commission.”⁵ Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.⁶

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.⁷

II. YMAX Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area

4. YMAX is a common carrier as that term is defined in the Act.⁸ The Applicant will provide the supported services in the Designated Service Area.

5. YMAX will offer all of the supported services enumerated under Section 254(c) using its own facilities. Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

6. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated at 47 C.F.R. § 54.101(a). These services are:

- a) Voice grade access to the public switched telephone network (PSTN).

"Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications,

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

⁶ 47 U.S.C. § 214(e)(1).

⁷ *Id.*

⁸ *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 . . .”).

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. YMAX is able to originate and terminate telephone service for all of its subscribers;

- b) Local usage. As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The Company's service includes unlimited local usage that allows customers to originate and terminate calls within the local calling area without incurring toll charges;
- c) Access to emergency services. "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. The Company will provide its customers with access to these services;
- d) Toll limitation for qualifying low-income consumers. Toll Blocking allows customers to block the completion of outgoing toll calls. Toll Control allows the customer to limit the dollar amount of toll charges a subscriber can incur during a billing period. YMAX provides qualifying Lifeline customers with access to toll limitation.⁹ The Company will seek toll limitation service ("TLS") reimbursement from the USF;

⁹ On December 30, 1997, the FCC issued an order clarifying its definition of "toll limitation" services as either toll blocking or toll control and requires carriers to offer only one, not necessarily both, of these services to be designated as an ETC.

e) While no longer required by 47 C.F.R. § 54.101(a), YMAX provides dual tone multi-frequency (“DTMF”) signaling to expedite the transmission of call set up and call detail information throughout the network, single party service for the duration of each telephone call and not multi-party (or “party-line”) services, access to operator services, the ability to make interexchange, or long distance, telephone calls, and access to directory assistance services.

7. YMAX 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.¹⁰ Accordingly, the Company satisfies the requirement set forth in Section 214(e)(1)(B).

III. Area for Which ETC Designation Is Requested

8. YMAX requests ETC designation throughout all AT&T Tennessee exchanges, as identified in Exhibit 2 attached hereto. YMAX does not seek Designation as an ETC in any areas served by rural telephone companies.

IV. YMAX Satisfies the Additional Requirements for Designation as an ETC

9. In accordance with 47 C.F.R. § 54.202(a)(1)(i), Applicant commits to comply with the service requirements applicable to the support that it receives. As a common carrier seeking designation as an ETC for low-income support only, Applicant is not required to submit a five-year network improvement plan.¹¹

¹⁰ See 47 C.F.R. §§ 54.201(d)(2).

¹¹ See *Lifeline and Link Up Reform Order* at ¶ 386; see also 47 C.F.R. § 54.202(a)(1)(ii).

10. An ETC Applicant must demonstrate its ability to remain functional in emergency situations (47 CFR §54.202(a)(2)). Since Applicant is providing service to its customers through the use of its own redundant facilities, Applicant will provide 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 to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

11. An ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards (47 C.F.R § 54.202(a)(3)). 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 an annual basis consistent with 47 C.F.R. § 54.422.

12. FCC Rules no longer require an applicant for ETC status to acknowledge that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.¹²

13. An applicant for ETC designation is no longer required to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.¹³ Nevertheless, Applicant will offer a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.

¹² See *id.*

¹³ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

14. In accordance with 47 C.F.R. § 54.202(a)(4), Applicant demonstrated its financial and technical capabilities in Docket No. 06-00067 referenced above.

15. The Company will provide reduced billing to Lifeline-eligible customers throughout its designated service area. The reduction will include the maximum federal Lifeline subsidy amount.

16. YMAX will certify a customer's initial and annual eligibility for Lifeline in accordance with 47 C.F.R. § 54.410.

17. In 47 C.F.R. 54.422, the FCC has identified certain annual reporting requirements in connection with the annual certification of ETCs as follows:

- (a)(1) The company name, names of the company's holding company, operating companies and affiliates, and any branding (a "dba," or "doing-business-as company" or brand designation) as well as relevant universal service identifiers for each such entity by Study Area Code. For purposes of this paragraph, "affiliates" has the meaning set forth in section 3(2) of the Communications Act of 1934, as amended; and
 - (2) Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the eligible telecommunications carrier offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.
- (b)(1) Detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which the eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect
- (i) At least ten percent of the end users served in a designated service area; or
 - (ii) A 911 special facility, as defined in 47 CFR 4.5(e).
 - (iii) Specifically, the eligible telecommunications carrier's annual report must include information detailing:
 - (A) The date and time of onset of the outage;
 - (B) A brief description of the outage and its resolution;
 - (C) The particular services affected;
 - (D) The geographic areas affected by the outage;

- (E) Steps taken to prevent a similar situation in the future; and
 - (F) The number of customers affected.
- (2) The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year;
 - (3) Certification of compliance with applicable service quality standards and consumer protection rules;
 - (4) Certification that the carrier is able to function in emergency situations as set forth in § 54.202(a)(2).

YMAX is committed to comply with all of the applicable annual reporting requirements that are required of it as a recipient of low-cost support, and in the event it becomes eligible for high cost support, will comply with 47 CFR 54.313, including the requirement to provide a five-year spending plan.

V. Granting YMAX's Application Will Serve the Public Interest

18. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹⁴ No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.¹⁵ Thus, the Act provides that the Commission “shall” designate YMAX as an ETC upon finding that the Applicant meets the requirements of Section 54.101(a) and Section 54.202(a) of the FCC’s Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a).

19. 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 to qualifying consumers throughout these same exchanges. The Company’s presence will undeniably include a benefit of increased customer

¹⁴ See 47 U.S.C. 214(e)(2).

¹⁵ See *Id.*

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.

20. 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. The Company's offering provides long distance calling which eliminates the billing of additional monthly fees. Services can be discontinued simply by nonpayment of the next month's services without penalty or disconnection fees.

21. A central purpose of the Telecommunications Act of 1996 was to "promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ... and encourage the rapid deployment of new telecommunications technologies."¹⁶ Designation of YMAX as an ETC would further these goals. Granting ETC status to YMAX would allow the Company to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

22. YMAX will publicize the availability of Lifeline service 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 program and will be able to take advantage of those opportunities by subscribing to YMAX's service. YMAX will advertise its services through media of general distribution which may include marketing at targeted retail locations, as well as advertisements via television and radio.

¹⁶ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

23. Since YMAX'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 can be critically important to a significant portion of the eligible low income consumers. Applicant believes that Lifeline 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 only between 20-50 % of consumers eligible for Lifeline Services in the State of Tennessee were being provided such services.¹⁷ 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.

24. Applicant hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon Applicant's provision of service contemplated by this Petition. Upon Commission request, Applicant is prepared to answer questions or present additional testimony or other evidence about its services within the state.

25. Applicant does not have any pending action or final unsatisfied judgment or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the Petition.

26. Applicant is a contributor to and in good standing with the Universal Service Fund and does not have any annual reports or assessment fees that are overdue, but is not

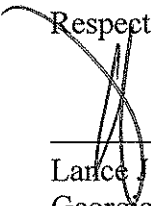
¹⁷ See attached Exhibit 3, 2010 Lifeline Participation Rates by State, which was obtained from the Universal Service Administrative Company ("USAC"), an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the Federal Communications Commission (FCC).

drawing from the fund since it cannot receive universal service funds until it is designated an ETC.

VI. Relief Requested

For the foregoing reasons, YMAX 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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List of Exhibits

Exhibit 1	Certification
Exhibit 2	Wire Centers
Exhibit 3	2010 Lifeline Participation Rates by State

Exhibit 1

Certification

State of Florida

County of Palm Beach

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)

Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Peter Russo, who first being duly sworn, deposes and states that he is the Chief Financial Officer of YMax Communications Corp., Applicant in this application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

Dated: _____

12/18/12

Peter Russo, Chief Financial Officer

Subscribed and sworn to before me this 18 day of Dec 2012.

(Notary Seal)

(Signature of person authorized to administer oath)

My Commission Expires: 9-14-2015

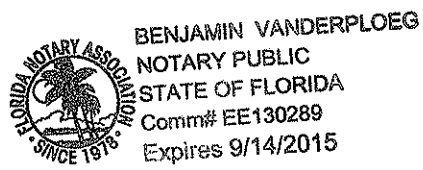


Exhibit 2

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	DCTRTNMT	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	FVLTNMA	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	JELICO
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	LFLTNTMA	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 3

2010 Lifeline Participation Rates by State

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



2-15-11