



Paul T. Stinson, P.E.
External & Legislative Affairs

AT&T Tennessee
333 Commerce Street
Suite 2102
Nashville, TN 37201-1800

T: 615.214.3839
F: 615.214.8867
paul.stinson@att.com
www.att.com

September 25, 2013

Hon. James M. Allison, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Request for Certification of the Use of Universal Service Funds Pursuant to
C.F.R. 54.314 and Telecommunications Act Section 254(e)

Dear Chairman Allison:

This letter is to request that the Tennessee Regulatory Authority ("Authority") submit a letter to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") certifying that BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ("AT&T Tennessee") is in compliance with all provisions of Section 254(e) of the Telecommunications Act.

The amount of federal high-cost support AT&T Tennessee will receive in 2014 will be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, AT&T Tennessee certifies that it will only use the federal high cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended.

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 Authority, because it only received Interstate Access Support ("IAS"). In its November 2011 Order, however, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. *See FCC Order* at para. 614.

At the same time, the FCC expanded the state certification requirements to require state commissions to certify that even carriers that only receive IAS support, which the FCC now calls "frozen high-cost support," are in compliance with Section 254(e) of the Telecommunications Act. *See* 47 C.F.R. § 54.314(a). AT&T Tennessee, therefore, respectfully requests that the Authority accept this letter and the attached

1090341



Proud Sponsor of the U.S. Olympic Team

Hon. James M. Allison
September 25, 2013
Page 2

affidavit as self-certification that AT&T Tennessee is in compliance with 47 U.S.C. § 254(e) and issue a letter to the FCC certifying that AT&T Tennessee used its high-cost support in the preceding year and will use its high-cost support in the coming calendar year in compliance with Section 254(e) of the Act and therefore is eligible to receive federal high-cost support in 2014.

Sincerely,


A handwritten signature in black ink, reading "Paul T. Stinson". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Paul T. Stinson



**AFFIDAVIT OF JEFF A. VAN DYKE
EXECUTIVE DIRECTOR
BELLSOUTH TELECOMMUNICATIONS LLC, d/b/a AT&T TENNESSEE**

1. My name is Jeff A. Van Dyke. I am employed by BellSouth Telecommunications LLC, d/b/a AT&T Tennessee as Executive Director, and am authorized to give this Affidavit. This Affidavit is being given to support the Tennessee Regulatory Authority's certification as required by 47 C.F.R. § 54.314(a).
2. Until the FCC's Nov. 2011 USF/ICC Transformation Order (17 FCC Rcd 17663) (hereinafter "*FCC Order*"), AT&T Tennessee submitted its certifications directly to the FCC as it only received Interstate Access Support (IAS). As part of the *FCC Order*, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. See *FCC Order* at para. 614. As a result, and in order for the Public Service Commission of Tennessee to certify AT&T Tennessee's continued eligibility for high-cost support in 2014, AT&T Tennessee provides the following certification:
3. Consistent with section 254(e) of the Communications Act of 1934, as amended, AT&T Tennessee used in the preceding year (2012) and will use in the upcoming year (2014) all of its federal high-cost support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.


Jeff A. Van Dyke
Executive Director, AT&T Tennessee

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

Subscribed and sworn to before me this 25th day of September, 2013.



My Commission Expires JUNE 21, 2016


NOTARY PUBLIC