



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

August 5, 2014

Hon. Herbert Hilliard, Chairman
Tennessee Regulatory Authority
502 Deaderick Street
Nashville, TN 37238

Re: 2014 Annual State Certification of Support for Eligible Telecommunications
Carriers Pursuant to 47 C.F.R. 54.314
Docket No. 14-00071

Dear Chairman Hilliard:

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 2015 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.

On July 1, 2014, AT&T Tennessee filed with the Authority a copy of its *Carrier Annual Report Data Collection Forms*, FCC Form 481, which was filed with the FCC on June 27, 2014. As reflected in that filing, AT&T Tennessee's SAC number is 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 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 affidavit as self-

1111221



Proud Sponsor of the U.S. Olympic Team

Hon. Herbert Hilliard
August 5, 2014
Page 2

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 dark ink, reading "Paul T. Stinson". The signature is fluid and cursive, with the first name "Paul" and last name "Stinson" clearly legible.

Paul T. Stinson

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: 2014 Annual State Certification of Support for Eligible Telecommunications
Carriers Pursuant to 47 C.F.R. § 54.314

Docket No. 14-00071

AFFIDAVIT OF JEFF A. VAN DYKE

STATE OF TENNESSEE
COUNTY OF DAVIDSON

COMES NOW Jeff A. Van Dyke and states as follows:

1. My name is Jeff A. Van Dyke. I am employed by BellSouth Telecommunications, LLC dba 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 ("the Authority") certification as required by 47 C.F.R. § 54.314(a).

2. Until the FCC's November 2011 USF/ICC Transformation Order (17 FCC Rcd 17663) (hereinafter "FCC Order"), AT&T Tennessee submitted certifications directly to the FCC, and not to the Authority, as it only received Interstate Access Support ("IAS"). As part of the FCC 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. As a result, and in order for the Authority to certify AT&T Tennessee's continued eligibility for high-cost support in 2015, 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 its high-cost support in the preceding year (2013) and will use its high-cost support in the coming calendar year (2015) all of its federal high-cost support only for the

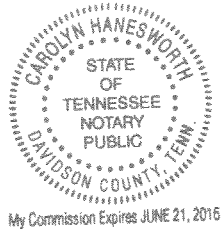
provision, maintenance, and upgrading of facilities and services for which the support is intended.

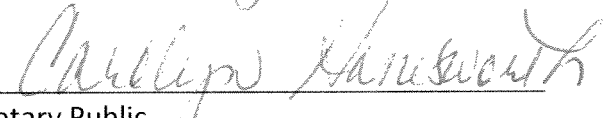


Jeff A. Van Dyke
Executive Director, AT&T Tennessee

STATE OF TENNESSEE
COUNTY OF DAVIDSON

Sworn to and subscribed before me this 5th day of August, 2014.





Notary Public