

BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSION

APPLICATION OF TELE CIRCUIT
NETWORK CORPORATION
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

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) Docket No. 15-00102
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**APPLICATION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND	3
	A. Company Overview	3
	B. Proposed Lifeline Offering	3
	C. Plan Enrollment	4
	D. Prevention of Waste, Fraud and Abuse	4
III.	TELE CIRCUIT SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC	5
	A. Tele Circuit Will Provide Service Using a Combination of its Own Facilities and Resale of Another Carrier's Services	6
	B. Tele Circuit Is a Common Carrier	7
	C. Tele Circuit Will Provide All Required Services and Functionalities	7
	1. Voice Grade Access to the Public Switched Telephone Network	8
	2. Minutes of Use for Local Service	8
	3. Access to Emergency Services	8
	4. Toll Limitation for Qualified Low-Income Customers	8
	5. Other Services	9
	D. Tele Circuit Will Advertise the Availability of Supported Services	9
	E. Tele Circuit Requests Designation Throughout its Service Area	10
	F. Service Commitment Throughout the Proposed Designated Service Area	11
	G. Five-Year Network Improvement Plan	11
	H. Ability to Remain Functional in Emergency Situations	11
	I. Commitment to Consumer Protection and Service Quality	11
	J. Local Usage Requirement	12
	K. Equal Access Requirement	12
	L. Financial and Technical Capability	12
	M. Tele Circuit Will Comply with Certification and Verification Requirements	13
	N. Tele Circuit Will Comply With All Regulations Imposed By The Commission	13
IV.	DESIGNATION OF TELE CIRCUIT AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST	14

A.	Advantages of Tele Circuit's Service Offerings	14
B.	The Benefits of Competitive Choice	15
C.	Impact on the Universal Service Fund	15
V.	REQUEST FOR EXPEDITED REVIEW	16
VI.	CONCLUSION	18

TABLE OF EXHIBITS

	<u>Exhibit</u>
Affidavit of Ashar Syed, Chief Executive Officer of Tele Circuit Network Corporation	1
Sample Certification Form	2
Sample Advertisement.....	3
Wire Centers	4

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I. INTRODUCTION

Tele Circuit Network Corporation (“Tele Circuit”, “Applicant” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, 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 (“Commission”), hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Tennessee (“Application”) and respectfully requests expedited review as supported herein. Tele Circuit seeks ETC designation to provide Lifeline services to qualifying Tennessee consumers; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high cost areas.³ As demonstrated herein, and as certified in Exhibit 1 to this Application, Tele Circuit meets all the statutory and regulatory requirements for designation as an ETC in the State of Tennessee, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform*

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that Tele Circuit only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

Order.⁴ Rapid grant of the Company's request, moreover, would advance the public interest because it would enable the Company to continue providing much-needed Lifeline services to its existing low-income Tennessee customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application for ETC designation.

Please address all correspondence, communications, pleadings, notices, orders and decisions relating to this Application to:

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⁴ *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*").

II. BACKGROUND

A. Company Overview

Tele Circuit is a Georgia Corporation⁵ and is authorized to conduct business as a foreign Corporation in the State of Tennessee. Copies of the Applicant's Articles of Incorporation and authority to transact business in the State of Tennessee are on file with the Commission and incorporated herein by reference. The Applicant was granted a Certificate of Convenience and Necessity ("CCN") to Provide Competing Local Exchange and Interexchange Telecommunications Services Within the State of Tennessee in Docket No. 08-00199 per Order issued on February 3, 2009, and the Company currently offers local and long distance services to customers in Tennessee. The principal office of the Applicant is located at 1815 Satellite Blvd., Ste. 504, Duluth, Georgia 30097. The Applicant will provide local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements obtained through agreements that allow end-to-end switching and delivery of calls. The Company has been designated as an ETC in Alabama and Florida. Tele Circuit does not have a holding company, operating company, or any affiliates, and operates under and identifies itself as Tele Circuit Network Corporation.

B. Proposed Universal Service Offering

Tele Circuit will provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Tennessee. The Company's prepaid Lifeline service offering will be an attractive alternative for consumers who need the security and reliability of a wireline phone, but at discounted Lifeline rates and without the burden of a credit checks or long-term service

⁵ Tele Circuit was incorporated in the State of Georgia on October 30, 2002.

contracts. The Company's Lifeline offering will provide customers with a discount on their monthly phone service package equal to the current maximum federal Lifeline subsidy, currently \$9.25, as well as a company credit of \$3.50. Under the Company's current tariffed rates, this would allow Lifeline customers to access basic local exchange service with the same calling scope as the ILEC for \$19.95 per month, with premium service plans available.

C. Plan Enrollment

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Customers may apply via phone, request that a Lifeline application form be mailed to them, or download a form from the Company's website. The Company's certification form will require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by 47 C.F.R. § 54.410(d).⁶ Tele Circuit will also annually re-certify the continued eligibility of all of its subscribers in accordance with 47 C.F.R. § 54.410(f). Tele Circuit has an automated system that provides company notification when a customer's annual re-certification is due. Tele Circuit then contacts the customer via an automated system to update their certification. If the customer does not respond, a customer service representative will make a live call.

D. Prevention of Waste, Fraud and Abuse

Tele Circuit recognizes the importance of safeguarding the USF. During enrollment, Tele Circuit verifies the address of the applicant via the applicant's government issued ID, and validates the address via a USPS/Melissa Database to ensure the address is correct. Once the

⁶ See attached Exhibit 2 for a sample certification form.

applicant's identity is confirmed, Tele Circuit verifies that the applicant is eligible to receive the Lifeline subsidy either by checking an available eligibility database, or by requiring the applicant to provide documentation showing proof of income or program-based eligibility. The Company will utilize the Universal Service Administrative Company's ("USAC") National Lifeline Accountability Database ("NLAD") to add, enroll, edit, and de-enroll subscribers in its Lifeline program. To further protect the integrity of the USF, Tele Circuit contracts with a third party Lifeline service bureau, currently CGM, LLC of Roswell, Georgia, to process and validate the Company's subsidy data to prevent Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month.

III. TELE CIRCUIT SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes. Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forborne from the "own facilities" requirement. Applicants also must commit to advertise the availability and rates of such services.⁷ As detailed below, Tele Circuit satisfies each of the above-listed requirements.

⁷ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

A. Tele Circuit Will Provide Service Using a Combination of its Own Facilities and Resale of Another Carrier's Services

Tele Circuit will offer all of the supported services enumerated under Section 254(c) using a combination of resale and unbundled network elements ("UNEs"). According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services. FCC's Rules (47 C.F.R. § 54.201(f)) state, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." The term "facilities" under 47 C.F.R. § 54.201(e) is defined as "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part." The Company's use of UNEs, including § 251 loops, or equivalents thereof, commingled with § 271 elements provided pursuant to an agreement filed with the Commission pursuant to § 252, meets this definition of "facilities." Accordingly, the Applicant will satisfy the requirement set forth in Section 214(e)(1)(A). Applicant is aware that it may seek USF funding only with respect to those customers that it serves through the use of its own facilities (including UNEs).

Although Section 214 requires ETCs to provide services using their own facilities, at least in part, the FCC has forbore from that requirement with respect to carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:⁸

- (1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing,

⁸ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

There is no need for Tele Circuit to avail itself of the FCC's grant of blanket forbearance in regards to the Company's wireline operations. However, Tele Circuit filed a wireline Compliance Plan with the FCC on May 5, 2012 (most recently amended on February 13, 2013) as a precaution; obtaining and maintaining UNEs is costly, and therefore Tele Circuit may consider, after approval of its wireline Compliance Plan, to provide service through resale only. Tele Circuit understands that such change in provision of service may require the Company to amend its ETC designation in Tennessee accordingly. Tele Circuit also has a separate Compliance Plan pending with the FCC in regards to its wireless service, which the Company has not yet begun to offer but will be provided solely through resale and as a complement to the Company's wireline telecommunications services.

B. Tele Circuit Is a Common Carrier

Tele Circuit is a common carrier as that term is defined in the Act.⁹

C. Tele Circuit Will Provide All Required Services and Functionalities

Tele Circuit is able to provide all of the services and functionalities required by 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)) including the following:

⁹ 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 . . .").

1. Voice Grade Access to the Public Switched Telephone Network

Tele Circuit provides voice grade access to the public switched telephone network (“PSTN”).

2. Minutes of Use for Local Service

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 FCC has not specified a minimum amount of local usage that an ETC must offer.¹⁰ Tele Circuit offers rate plans that provide its customers with minutes of use for local service at no additional charge.

3. Access to Emergency Services

Tele Circuit provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems.

4. Toll Limitation for Qualified Low-Income Customers

In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service. As a local exchange carrier, Tele Circuit distinguishes between toll and non-toll calls. Therefore, the Company offers toll limitation service (TLS) at no cost to its Lifeline customers in order to afford them the ability to manage the cost of their monthly service plans and avoid higher expenditures that could prove to be devastating to a household of limited means. Tele Circuit provides unlimited minutes per month available for local calls only and a separate pool of minutes available for long distance calls (toll control). Customers may also opt out of the long distance minutes provided by Tele Circuit and either choose a different long distance provider, or request that the option for long distance calls be blocked altogether (toll block).

¹⁰ See e.g., *In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision 15 FCC Rcd 7331 (2002).

5. Other Services

While no longer required by 47 C.F.R. § 54.101(a), Tele Circuit 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.

D. Tele Circuit Will Advertise the Availability of Supported Services

Tele Circuit will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R § 54.201(d)(2). The Company’s advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*.¹¹ The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline services, using mediums for outreach such as marketing at targeted retail locations, as well as advertisements via television, radio and trade magazines.¹² The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline services, promoting the availability of cost-effective telecommunications services to this neglected consumer segment. Tele Circuit may also promote the availability of its Lifeline offerings by distributing brochures at various state and local social service agencies, and/or may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline services. When additional carriers enter the market with programs designed specifically for low-income customers, it increases the likelihood that eligible customers will become generally aware of these valuable options for telecommunications

¹¹ See *Lifeline and Link Up Reform Order* at Section VII.F.

¹² See attached Exhibit 3 for a sample advertisement.

service. Tele Circuit believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline program.

Tele Circuit will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:¹³ (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Tele Circuit's website and printed collateral will explain the documentation necessary for enrollment, and the details of Tele Circuit's plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.¹⁴ For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Tele Circuit will include the URL link for its website where disclosures will be listed. Additionally, Tele Circuit will disclose the company name under which it does business.¹⁵

E. Tele Circuit Requests Designation Throughout Its Service Area

Tele Circuit is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, Tele Circuit is required to describe the geographic area(s) within which it requests designation as an ETC. Tele Circuit requests ETC designation in the exchanges of BellSouth Telecommunications, LLC d/b/a AT&T Tennessee.¹⁶ Tele Circuit does

¹³ The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. *See Lifeline and Link Up Reform Order* at ¶ 275.

¹⁴ *See Lifeline and Link Up Reform Order* at ¶ 275.

¹⁵ *See id.*

¹⁶ See Exhibit 4 for a list of wire centers within the proposed Designated Service Area.

not seek certification as an ETC in any areas served by rural telephone companies.

F. Service Commitment Throughout the Proposed Designated Service Area

Tele Circuit already provides service in Tennessee, and thus will be able to provide its Lifeline service throughout the designated service area immediately upon approval from the Commission. Tele Circuit commits to comply with the service requirements applicable to the support that it receives.¹⁷

G. Five-Year Network Improvement Plan

As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.¹⁸

H. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2), Tele Circuit provides to its customers the same ability to remain functional in emergency situations as currently provided by the ILEC(s) to its own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

I. Commitment to Consumer Protection and Service Quality

Under FCC and Commission guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.¹⁹ The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. As part of its certification requirements for providing local

¹⁷ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a)(1)(i).

¹⁸ See *Lifeline and Link Up Reform Order* at ¶ 386.

¹⁹ See 47 C.F.R. § 54.202(a)(3).

exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting consumer protection and service quality information on an annual basis consistent with 47 C.F.R. § 54.422.

J. Local Usage Requirement

An applicant for ETC designation is no longer required by FCC rules to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.²⁰ Nevertheless, Applicant will offer a local usage plan comparable to the one offered by the ILEC in the service areas for which it seeks designation. Applicant offers a local usage plan with unlimited calling within the customer's local calling area for a flat monthly fee with the same calling scope as the ILEC.

K. Equal Access Requirement

The FCC's Rules no longer require an applicant for ETC status to provide a certification that it acknowledges 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.²¹

L. Tele Circuit is Financially and Technically Capable

Tele Circuit is financially and technically capable of providing Lifeline-supported services.²² Tele Circuit has been providing telecommunications services for over five years and provides service to both Lifeline and non-Lifeline customers. Tele Circuit currently provides local and long distance wireline services in Alabama, Florida, Georgia, Louisiana, North Carolina, South Carolina and Tennessee, and operates as an ETC in Alabama and Florida; Tele Circuit also provides long distance service in Arizona, Colorado, Illinois, New York, Massachusetts, Michigan,

²⁰ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

²¹ See *id.*

²² See *Lifeline and Link Up Reform Order* at ¶ 387.

Minnesota, Missouri, New Jersey, Oklahoma, Texas, Utah, Virginia, and Wisconsin. Tele Circuit has not been subject to ETC revocation proceedings in any state. Tele Circuit is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. The Company will continue to rely on its successful business model and service offerings to sustain and grow its business, independent of USF disbursements that provide discounts for qualifying Lifeline subscribers. Tele Circuit is self-reliant and receives revenue from both its long distance business and its non-Lifeline local business. Furthermore, the senior management of Tele Circuit has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.

M. Tele Circuit Will Comply with Certification and Verification Requirements

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Tele Circuit will certify and verify consumer eligibility in accordance with applicable FCC and Commission requirements.

N. Tele Circuit Will Comply With All Regulations Imposed By The Commission

By this Application, Tele Circuit hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application. Tele Circuit certifies that all federal USF funding received will be used for Lifeline support and will be flowed through to the direct benefit of eligible low-income consumers. The Company will report annually the information required by 47 C.F.R. §§ 54.416 and 54.422. Upon Commission request, Tele Circuit is prepared to answer questions or present additional testimony or other evidence about its services within the state.

IV. DESIGNATION OF TELE CIRCUIT AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.²³ Designation of Tele Circuit as an ETC in Tennessee will further the public interest by providing Tennessee consumers, especially low-income consumers, with low prices and high quality services. Whether because of financial constraints, poor credit history or intermittent employment, many low-income customers in Tennessee often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Tele Circuit as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the State of Tennessee—the intended beneficiaries of universal service.

A. Advantages of Tele Circuit’s Service Offerings

Tele Circuit’s Lifeline program will provide low-income Tennessee residents with the reliability and security offered by wireline services—even if their financial position deteriorates. Low-income individuals can greatly benefit from the advantages offered by the Company’s Lifeline service, allowing those adversely impacted by the economy or job loss to have access to affordable telephone service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. The Company’s service is of particular interest to credit-

²³ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

challenged customers—many of whom are low income—who generally cannot obtain service from the incumbent carrier. Providing Tele Circuit with the authority necessary to offer discounted Lifeline services to those most in danger of losing telephone service altogether undoubtedly promotes the public interest.

Moreover, grant of Tele Circuit’s Application will serve the public interest in increasing the number of ETCs in Tennessee. By granting ETC status to Tele Circuit, the Commission will enable Tele Circuit to increase the number of Tennessee residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Tennessee.

B. The Benefits of Competitive Choice

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.²⁴ Designation of Tele Circuit as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs, resulting in improved services to consumers. Designation of Tele Circuit as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.²⁵ Introducing Tele Circuit into the market as an additional ETC provider will afford low-income Tennessee residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of

²⁴ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

²⁵ See 47 U.S.C. § 254(b)(1).

support available to an eligible subscriber is exactly the same whether the support is given through a company such as Tele Circuit or the Incumbent LEC operating in the same service area. Tele Circuit will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link-Up Reform Order*, Tele Circuit will minimize the likelihood that its customers are not eligible or are receiving duplicative support either individually or within their household. Significantly, the Company's designation as an ETC will not increase the number of persons eligible for Lifeline support. Tele Circuit's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable telecommunications services to low-income consumers.

V. REQUEST FOR EXPEDITED REVIEW

Tele Circuit currently provides Lifeline-discounted service in Tennessee through resale of AT&T's retail Lifeline service, under the provisions of Section 251(c)(4). However, the FCC recently issued rule changes that will effectively eliminate non-ETC resellers of Lifeline service. In the FCC's *Second Report and Order* released June 22, 2015, the FCC announced its decision to limit reimbursement for Lifeline service to Lifeline providers directly serving Lifeline customers.²⁶ The FCC further explained, "Since we will not provide reimbursement to incumbent LECs for this purpose, we now forbear from requiring incumbent LECs to resell retail

²⁶ See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) ("*Second Report and Order*"), section IV.B.

Lifeline-discounted service under Section 251 of the Act.²⁷ The FCC concluded that applying the Section 251(c)(4) requirements in the context of Lifeline is not necessary, noting “The percentage of resold lines by incumbent LECs in the Lifeline program is minimal, and wireline CETCs have a variety of methods to offer service without using resold Lifeline-discounted service, such as, but not limited to, the use of unbundled network elements (UNEs)...” (*Second Report and Order*, paragraph 253).

According to paragraph 249 of the *Second Report and Order*, providers like Tele Circuit will have “a 180-day transition period following the effective date of this order during which non-ETC resellers may either obtain ETC status or cease providing Lifeline-discounted service after compliance with state and federal rules regarding discontinuance.” The *Second Report and Order* was effective August 13, 2015, thirty (30) days after publication in the Federal Register.²⁸ Therefore, in order to ensure Tele Circuit is able to continue providing service to its existing Lifeline customer base in Tennessee, the Company must receive designation as an ETC prior to Feb. 9, 2016. For this reason, the Company respectfully requests expedited review and approval of its Application so that it will have adequate time to complete the required transition and ensure that none of the Company’s current Lifeline customers will experience any interruption in service.

²⁷ *Second Report and Order* at ¶ 249.

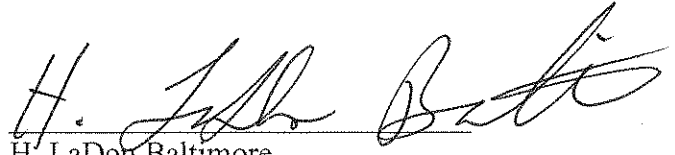
²⁸ See 80 FR 40923 (July 14, 2015); <https://federalregister.gov/a/2015-17186>.

VI. CONCLUSION

Based on the foregoing, designation of Tele Circuit as an ETC in the State of Tennessee accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Tele Circuit respectfully requests that the Commission promptly designate Tele Circuit as an ETC in the State of Tennessee.

Respectfully submitted,



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November 3, 2015

EXHIBIT 1

Affidavit of Ashar Syed, Chief Executive Officer of Tele Circuit Network Corporation

AFFIDAVIT

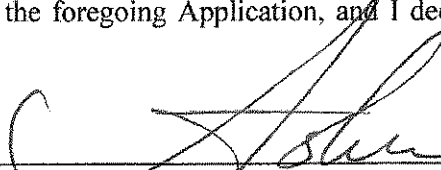
State of Georgia

County of Gwinnett

)
)
)

VERIFICATION OF APPLICANT

I, Ashar Syed, Chief Executive Officer of Tele Circuit Network Corporation, the applicant for Designation as an Eligible Telecommunications Carrier from the Tennessee Regulatory Authority of the State of Tennessee, verify that based on information and belief, I have knowledge of the statements in the foregoing Application, and I declare that they are true and correct.



Ashar Syed, Chief Executive Officer
Tele Circuit Network Corporation

Subscribed and sworn to before me, a Notary Public, this 16 day of SEPTEMBER 2015.

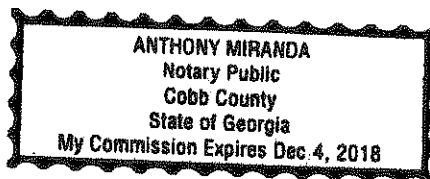
(Notary Seal)



(Signature of person authorized to administer oath)

My Commission Expires:

12/4/2018



TN - ETC

EXHIBIT 2

Sample Certification Form

TELECIRCUIT NETWORK CORPORATION LIFELINE APPLICATION

WIRELINE

- LIFELINE IS A FEDERAL BENEFIT
- BY LAW, LIFELINE IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, EITHER LAND LINE OR WIRELESS; A HOUSEHOLD CANNOT RECEIVE BENEFITS FROM MULTIPLE PROVIDERS
- A HOUSEHOLD IS DEFINED, FOR PURPOSES OF THE LIFELINE PROGRAM, AS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES

I hereby certify that I participate in a minimum of one of the following programs:

<input type="checkbox"/> Federal Public Housing Assistance (FPHA)	<input type="checkbox"/> Food Stamps (SNAP)
<input type="checkbox"/> Temporary Assistance to Needy Families (TANF)	<input type="checkbox"/> Supplemental Security Income (SSI)
<input type="checkbox"/> National School Lunch Program (free)	<input type="checkbox"/> Medicaid
<input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP)	

I hereby certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG).

*There are individuals in my household;

Last Name: First Name: MI

Residence Street/Apt No.(NO P.O. Box)

City: State: Zip Code:

This address is ☐ Permanent ☐ Temporary ☐ Multi-Household

Billing Street/Apt No. City: State: Zip Code:

Contact Phone Number: Last 4 Digits of SSN#: Birth Date:

PENALTY OF PERJURY

Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

I certify under penalty of perjury that:

I understand that Lifeline assistance is available for only one residential wired phone line per household or one wireless phone per household (i.e. not both). I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.

To the best of my knowledge, neither I nor anyone in my household currently receives landline or wireless Lifeline service.

I will notify Tele Circuit within thirty (30) days if I no longer qualify for Lifeline.

I will notify Tele Circuit within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Tele Circuit every ninety (90) days. If I fail to respond to Tele Circuit's address verification attempts within thirty (30) days, my Tele Circuit Lifeline service may be terminated.

I understand that Tele Circuit will contact me each year to re-certify my continued eligibility for Lifeline. If I fail to re-certify my eligibility within thirty (30) days, it will result in the termination of my Tele Circuit Lifeline service.

I understand that it is a violation of federal and state law to rent, sell, or give away Tele Circuit Lifeline Service and that I certify that I will only use this phone for my household's own use and will not resell it. I understand Lifeline service is non-transferrable.

TELECIRCUIT NETWORK CORPORATION LIFELINE APPLICATION

WIRELINE

I authorize Tele Circuit or its duly appointed representative(s) to: 1) access any records contained in any governmental or commercial database to verify my statements herein to; 2) confirm eligibility and/or continued eligibility for Lifeline assistance; 3) to validate, confirm or update my address; and 4) authorize social service agency representatives to discuss with and/or provide information to Tele Circuit verifying my participation in benefit programs or income levels that qualify me for Lifeline assistance. I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.

____ CHECK HERE THAT YOU HAVE READ AND AGREE TO ALL OF THE STATEMENTS ABOVE. Signing below, I acknowledge that the information contained on this form is true and correct the best of my knowledge and belief and providing false or fraudulent documentation in order to receive government assistance is punishable by law.



APPLICANT'S SIGNATURE

DATE

FOR OFFICE USE ONLY:

Company Representative: _____

Documentation Verified: _____

Signature: _____

Date: _____

EXHIBIT 3

Sample Advertisement

Visual

Graphic:

Do you receive
Government Assistance?

Roll the graphic:

Food Stamps
Housing Assistance
Medicaid
Supplemental Security Income
Low Income Home Energy Assistance Program
Temporary Assistance for Needy Families
Free School Lunch program
Income at or below federal poverty guidelines

Graphic:

First Month Free
Caller ID
Call Waiting
FREE Long Distance

No Deposit
No Credit Check
(call for details - local AT&T service areas only)

Graphic:

\$19.95 per month
(plus taxes and fees)

Graphic continuously at the bottom of the screen

1-800-738-0057
Tele Circuit Network Corporation
www.telecircuit.com

Lifeline is a federal government benefit program. Only eligible consumers may enroll – proof of eligibility is required. Lifeline is non-transferable, and is limited to one service per household.

Audio

Are you currently receiving any type
of government assistance?

If so, you may qualify for government
assisted home telephone service for
only \$19.95 per month.

If you are eligible for Lifeline service,
your first month is FREE, including
Caller ID and Call Waiting plus free
long distance each month. There is
no credit check and no deposit.

Call today at 1-800-738-0057 to
receive your first month of
government assisted home phone
service FREE.

CALL us NOW at 1-800-738-0057.

EXHIBIT 4

Wire Centers

Company	Rate Center	CLLI
BELLSOUTH TELECOMM INC	ADMSCDARHL	ACHLTNMTRS0
BELLSOUTH TELECOMM INC	ARLINGTON	ARTNTNMTRS0
BELLSOUTH TELECOMM INC	ASHLAND CY	ASCYTNMADS0
BELLSOUTH TELECOMM INC	ATHENS	ATHNTNMADS0
BELLSOUTH TELECOMM INC	BIG SANDY	BGSNTNMARS0
BELLSOUTH TELECOMM INC	BULLS GAP	BLGPTNMARS0
BELLSOUTH TELECOMM INC	BELLS	BLLSTNMARS0
BELLSOUTH TELECOMM INC	BLANCHE	BLNCTNMTRS5
BELLSOUTH TELECOMM INC	BOLIVAR	BLVRTNMADS0
BELLSOUTH TELECOMM INC	BOLIVAR	BLVRTNMADS1
BELLSOUTH TELECOMM INC	BENTON	BNTNTNMTRS0
BELLSOUTH TELECOMM INC	BETHEL SPG	BTSPTNMARS0
BELLSOUTH TELECOMM INC	BROWNSVL	BWVLTNMADS1
BELLSOUTH TELECOMM INC	CHARLOTTE	CHRLTNMTDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNBRDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNDTDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNHTDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNMVDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNNSDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNNSDS1
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNRBDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNRODS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNSEDS0
BELLSOUTH TELECOMM INC	CHATTNOOGA	CHTGTNSMRS0
BELLSOUTH TELECOMM INC	CHARLESTON	CHTNTNMTRS0
BELLSOUTH TELECOMM INC	CUMBERLDGP	CLDGTNMADS1
BELLSOUTH TELECOMM INC	CLEVELAND	CLEVTNMADS0
BELLSOUTH TELECOMM INC	GEORGETOWN	CLEVTNMADS0
BELLSOUTH TELECOMM INC	COLUMBIA	CLMATNMADS0
BELLSOUTH TELECOMM INC	CLINTON	CLTNTNMADS0
BELLSOUTH TELECOMM INC	CLARKSVL	CLVLTNMADS0
BELLSOUTH TELECOMM INC	CUMBERLDCY	CMCYTNMTRS5
BELLSOUTH TELECOMM INC	CAMDEN	CMDNTNMADS0
BELLSOUTH TELECOMM INC	SCUNNINGHA	CNHMTNMARS5
BELLSOUTH TELECOMM INC	CUNNINGHAM	CNHMTNMARS5
BELLSOUTH TELECOMM INC	CENTERVL	CNVLTNMARS0
BELLSOUTH TELECOMM INC	COPPERBSIN	CRHLTNCBRS0
BELLSOUTH TELECOMM INC	MICHIE	CRNTMSMADS2
BELLSOUTH TELECOMM INC	CRSPLORLND	CRPLTNMARS0
BELLSOUTH TELECOMM INC	CARTHAGE	CRHTNMARS5
BELLSOUTH TELECOMM INC	COLLIERVL	CRVLTNMADS0
BELLSOUTH TELECOMM INC	CULLEOKA	CULKTNMARS5
BELLSOUTH TELECOMM INC	COVINGTON	CVTNTNMTDS1
BELLSOUTH TELECOMM INC	DECATUR	DCTRNTMTRS5
BELLSOUTH TELECOMM INC	DICKSON	DKSNTNMTDS0

BELLSOUTH TELECOMM INC	DANDRIDGE	DNRGTNMADS0
BELLSOUTH TELECOMM INC	DOVER	DOVRTNMTRS5
BELLSOUTH TELECOMM INC	DYERSBURG	DYBGTNMADS0
BELLSOUTH TELECOMM INC	DYER	DYERTNMTRS0
BELLSOUTH TELECOMM INC	DAYTON	DYTNTNMADS0
BELLSOUTH TELECOMM INC	EAGLEVILLE	EAVLTNMARS5
BELLSOUTH TELECOMM INC	ETOWAH	ETWHTNMTRS0
BELLSOUTH TELECOMM INC	MARYVILLE	FIVLTNMARS5
BELLSOUTH TELECOMM INC	FRANKLIN	FKLNTNCCRS5
BELLSOUTH TELECOMM INC	FRANKLIN	FKLNTNMADS0
BELLSOUTH TELECOMM INC	SO FULTON	FLTNYMADS0
BELLSOUTH TELECOMM INC	FLINTVILLE	FLVLTNMARS5
BELLSOUTH TELECOMM INC	SOFREDONIA	FRDNTNMARS5
BELLSOUTH TELECOMM INC	FREDONIA	FRDNTNMARS5
BELLSOUTH TELECOMM INC	FAIRVIEW	FRVWTNMTRS5
BELLSOUTH TELECOMM INC	FAYETTEVL	FYVLTNMADS0
BELLSOUTH TELECOMM INC	GALLATIN	GALLTNMADS0
BELLSOUTH TELECOMM INC	GIBSON	GBSNTNMTRS0
BELLSOUTH TELECOMM INC	GRAND JCT	GDJTTNMARS0
BELLSOUTH TELECOMM INC	LAGRANGE	GDJTTNMARS0
BELLSOUTH TELECOMM INC	GOODLETSVL	GDVLTNMARS0
BELLSOUTH TELECOMM INC	GLEASON	GLSNTNMARS0
BELLSOUTH TELECOMM INC	GREENBRIER	GNBRTNMARS5
BELLSOUTH TELECOMM INC	GREENFIELD	GNFDTNMADS0
BELLSOUTH TELECOMM INC	GREENBACK	GRNBNTNMARS5
BELLSOUTH TELECOMM INC	GATLINBURG	GTBGTNMTDS0
BELLSOUTH TELECOMM INC	SO GUTHRIE	GTHRKYMADS0
BELLSOUTH TELECOMM INC	MEMPHIS	GTWSTNSWRS5
BELLSOUTH TELECOMM INC	HENDERSNVL	HDVLTNMADS0
BELLSOUTH TELECOMM INC	HOHENWALD	HHNWTNMARS5
BELLSOUTH TELECOMM INC	HARRIMAN	HIMNTNMADS0
BELLSOUTH TELECOMM INC	HALLS	HLLSTNMTRS5
BELLSOUTH TELECOMM INC	HUMBOLDT	HMBLTNMADS1
BELLSOUTH TELECOMM INC	HAMPSHIRE	HMPSTNMARS5
BELLSOUTH TELECOMM INC	HUNTLAND	HNLDTNMADS0
BELLSOUTH TELECOMM INC	HENNING	HNNGTNMARS5
BELLSOUTH TELECOMM INC	HENDERSON	HNSNTNMTRS0
BELLSOUTH TELECOMM INC	HUNTINGDON	HNTGTNMADS0
BELLSOUTH TELECOMM INC	CEDARGROVE	HNTGTNMADS0
BELLSOUTH TELECOMM INC	NEWPORT	HRFRTNMARS0
BELLSOUTH TELECOMM INC	BENTCREEK	HRFRTNMARS0
BELLSOUTH TELECOMM INC	HORNBEAK	HRNBNTNMTRS5
BELLSOUTH TELECOMM INC	HARTSVILLE	HTVLTNMARS5
BELLSOUTH TELECOMM INC	JACKSON	JCSNTNMADS0
BELLSOUTH TELECOMM INC	JACKSON	JCSNTNNSDS0
BELLSOUTH TELECOMM INC	JEFFERSNCY	JFCYTNMADS1
BELLSOUTH TELECOMM INC	JELICO	JLLCTNMARS0

BELLSOUTH TELECOMM INC	JASPER	JSPRTNMTDS0
BELLSOUTH TELECOMM INC	KINGSTON	KGTNTNMTDS0
BELLSOUTH TELECOMM INC	KENTON	KNTNTNMARS5
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNBEDS0
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNFCDS0
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNMADS0
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNMADS1
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNWHDS0
BELLSOUTH TELECOMM INC	KNOXVILLE	KNVLTNYHDS0
BELLSOUTH TELECOMM INC	LEBANON	LBNNTNMADS0
BELLSOUTH TELECOMM INC	LAFOLLETTE	LFLTNTMADS0
BELLSOUTH TELECOMM INC	LAKE CITY	LKCYTNMADS0
BELLSOUTH TELECOMM INC	LENOIRCITY	LNCYTNMADS0
BELLSOUTH TELECOMM INC	LOUDON	LODNTNMARS5
BELLSOUTH TELECOMM INC	LAWRENCEBG	LRBGTNMADS0
BELLSOUTH TELECOMM INC	LEWISBURG	LWBGTNMADS0
BELLSOUTH TELECOMM INC	LEXINGTON	LXTNTNMADS1
BELLSOUTH TELECOMM INC	LYNCHBURG	LYBGTNMTRS0
BELLSOUTH TELECOMM INC	SPENCERMIL	LYLSTNMARS0
BELLSOUTH TELECOMM INC	LYLES	LYLSTNMARS0
BELLSOUTH TELECOMM INC	LYNNVILLE	LYVLTNMARS5
BELLSOUTH TELECOMM INC	MARYVILLE	MAVLTNMADS0
BELLSOUTH TELECOMM INC	KNOXVILLE	MAVLTNMADS0
BELLSOUTH TELECOMM INC	MCKENZIE	MCKNTNMARS0
BELLSOUTH TELECOMM INC	MCEWEN	MCWNTNMTRS5
BELLSOUTH TELECOMM INC	FORK RIDGE	MDBOKYMADS1
BELLSOUTH TELECOMM INC	MIDDLETON	MDTNTNMADS0
BELLSOUTH TELECOMM INC	MADISONVL	MDVITNMTDS0
BELLSOUTH TELECOMM INC	MEDINA	MEDNTNMADS0
BELLSOUTH TELECOMM INC	MILAN	MILNTNMARS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNBADS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNCKDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNCTDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNELDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNFRDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNGTDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNHPRS5
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNMADS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNMADS1
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNMTDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNOADS1
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNSLDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNSTDS0
BELLSOUTH TELECOMM INC	MEMPHIS	MMPHTNWWRS0
BELLSOUTH TELECOMM INC	MANCHESTER	MNCHTNMADS0
BELLSOUTH TELECOMM INC	MTPLEASANT	MNPLTNMARS5
BELLSOUTH TELECOMM INC	MURFREESBO	MRBOTNMADS0

BELLSOUTH TELECOMM INC	MORRISTOWN	MRTWTNMADSO
BELLSOUTH TELECOMM INC	BEAN STATN	MRTWTNMADSO
BELLSOUTH TELECOMM INC	MASCOT	MSCTTNMTDS0
BELLSOUTH TELECOMM INC	MOSCOW	MSCWTNMARSO
BELLSOUTH TELECOMM INC	MAYNARDVL	MYVLTNMARSO
BELLSOUTH TELECOMM INC	N/A	NOCLLIKNOWN
BELLSOUTH TELECOMM INC	XXXXXXXXXX	NOCLLIKNOWN
BELLSOUTH TELECOMM INC	NORRIS	NRRSTNMARSO
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNAAARS5
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNAPDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNBHRS5
BELLSOUTH TELECOMM INC	MURFREESBO	NSVLTNBVDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNBVR50
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNBWDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNCDRS5
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNCHDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNDODS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNHHR55
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNINCG0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNMCDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNMT84T
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNMTDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNMTDS1
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNMTDS3
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNSTDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNUNDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNWCDS0
BELLSOUTH TELECOMM INC	NASHVILLE	NSVLTNWMDS0
BELLSOUTH TELECOMM INC	NEWBERN	NWBRTNMARS5
BELLSOUTH TELECOMM INC	NEWPORT	NWPTTNMTDS0
BELLSOUTH TELECOMM INC	CHESTNUTHI	NWPTTNMTDS0
BELLSOUTH TELECOMM INC	SOOAKGROVE	OKGVKYESDS0
BELLSOUTH TELECOMM INC	OAK RIDGE	OKRGTNMTDS0
BELLSOUTH TELECOMM INC	SOLWAY	OKRGTNMTDS0
BELLSOUTH TELECOMM INC	OLDHICKORY	OLHCTNMARS5
BELLSOUTH TELECOMM INC	OLIVER SPG	OLSPTNMARSO
BELLSOUTH TELECOMM INC	PARIS	PARSTNMADS1
BELLSOUTH TELECOMM INC	PALMYRA	PLMYTNMAR55
BELLSOUTH TELECOMM INC	PULASKI	PLSKTNMADS0
BELLSOUTH TELECOMM INC	ELKTON	PLSKTNMADS0
BELLSOUTH TELECOMM INC	PLEASANTVW	PSVWTNMTRS0
BELLSOUTH TELECOMM INC	PETERSBURG	PTBGTNMARSO
BELLSOUTH TELECOMM INC	PORTLAND	PTLDTNMARS5
BELLSOUTH TELECOMM INC	RIDGELY	RDGLTNMAR55
BELLSOUTH TELECOMM INC	ROCKWOOD	RKWDTNMADS0
BELLSOUTH TELECOMM INC	RIPLEY	RPLYTNMADS0
BELLSOUTH TELECOMM INC	ROGERSVL	RRVLTNMADS0

BELLSOUTH TELECOMM INC	EASTSANGO	SANGTNMTRS5
BELLSOUTH TELECOMM INC	SANGO	SANGTNMTRS5
BELLSOUTH TELECOMM INC	SODDYDAISY	SDDSTNMARS5
BELLSOUTH TELECOMM INC	SEWANEE	SEWNTNMWDS0
BELLSOUTH TELECOMM INC	SHELBYVL	SHVLTNMADS0
BELLSOUTH TELECOMM INC	SELMER	SLMRTNMADS0
BELLSOUTH TELECOMM INC	SUMMERTOWN	SMTWTNMARS5
BELLSOUTH TELECOMM INC	SMYRNA	SMYRTNMADS0
BELLSOUTH TELECOMM INC	SANTA FE	SNTFTNMARS5
BELLSOUTH TELECOMM INC	SNEEDVILLE	SNVLTNMARS0
BELLSOUTH TELECOMM INC	SOMERVILLE	SOVLTNMTDS0
BELLSOUTH TELECOMM INC	SO PITTSBG	SPBGTNMARS0
BELLSOUTH TELECOMM INC	SPRINGCITY	SPCYTNMTRS0
BELLSOUTH TELECOMM INC	SPRINGFLD	SPFDTNMADS0
BELLSOUTH TELECOMM INC	NSPRINGHIL	SPHLTNMTRS0
BELLSOUTH TELECOMM INC	SPRINGHILL	SPHLTNMTRS0
BELLSOUTH TELECOMM INC	SURGOINSVL	SRVLTNMADS0
BELLSOUTH TELECOMM INC	SAVANNAH	SVNHTNMADS0
BELLSOUTH TELECOMM INC	SEVIERVL	SVVLTNMTDS0
BELLSOUTH TELECOMM INC	SWEETWATER	SWTWTNMTRS0
BELLSOUTH TELECOMM INC	WESTSWEETW	SWTWTNMTRS0
BELLSOUTH TELECOMM INC	TULLAHOMA	TLLHTNMADS0
BELLSOUTH TELECOMM INC	TIPTONVL	TPVLTNMARS0
BELLSOUTH TELECOMM INC	TRIUNE	TRINTNMARS5
BELLSOUTH TELECOMM INC	TROY	TROYTNMTRS5
BELLSOUTH TELECOMM INC	TRENTON	TRTNTNMADS0
BELLSOUTH TELECOMM INC	MARYVILLE	TWNSTNMARS5
BELLSOUTH TELECOMM INC	UNION CITY	UNCYTNMADS0
BELLSOUTH TELECOMM INC	VANLEER	VNLRTNMARS5
BELLSOUTH TELECOMM INC	W VANLEER	VNLRTNMARS5
BELLSOUTH TELECOMM INC	WHITEBLUFF	WHBLTNMTDS0
BELLSOUTH TELECOMM INC	KINGSTNSPG	WHBLTNMTDS0
BELLSOUTH TELECOMM INC	WHITEHOUSE	WHHSTNMARS0
BELLSOUTH TELECOMM INC	WHITE PINE	WHPITNMADS0
BELLSOUTH TELECOMM INC	WHITEVILLE	WHVLTNMTRS0
BELLSOUTH TELECOMM INC	WESTWHITEV	WHVLTNMTRS0
BELLSOUTH TELECOMM INC	WHITWELL	WHWLTNMARS0
BELLSOUTH TELECOMM INC	WILLIAMSPT	WLPTTNMARS0
BELLSOUTH TELECOMM INC	WINCHESTER	WNCHTNMADS0
BELLSOUTH TELECOMM INC	WARTRACE	WRTRTNMTRS5
BELLSOUTH TELECOMM INC	NORMANDY	WRTRTNMTRS5
BELLSOUTH TELECOMM INC	WATERTOWN	WTTWTNMARS5
BELLSOUTH TELECOMM INC	WAVERLY	WVRLTNMTRS5