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150 Third Avenue South, Suite 2800
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(615) 742-6244

R. Dale Grimes
dgrimes@bassberry.com

Washington D.C. Office
1201 Pennsylvania Avenue NW, Suite 300
Washington, DC 20004
(202) 827-2961

January 18, 2017

Via Hand-Delivery

The Honorable Earl Taylor
Executive Director
Tennessee Regulatory Authority
c/o Sharla Dillon
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

**In re: *Application of United Communications, Inc. for a Certificate to Provide
Competing Local Telecommunication Services***
Docket No. 17-00007

Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of United Communications, Inc.'s Application for a Certificate to Provide Competing Local Telecommunication Services with accompanying exhibits. Filed along with this material are four copies of Exhibits F and G, which are submitted under seal in a separate envelope. Also enclosed is a check in the amount of Twenty-five Dollars (\$25.00) to cover the filing fee. This Application, without the confidential exhibits, is being filed electronically with the Authority's Docket Manager, Sharla Dillon.

Please file the original and four (4) copies of this material and stamp the additional copy as "filed". Then please return the stamped copy to me by way of our courier.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

With kindest regards, I remain

Very truly yours,



R. Dale Grimes

Enclosures

14576584.1

BEFORE THE TENNESSEE REGULATORY AUTHORITY

**IN THE MATTER OF THE APPLICATION
OF UNITED COMMUNICATIONS, INC. FOR
A CERTIFICATE TO PROVIDE
COMPETING LOCAL
TELECOMMUNICATION SERVICES**

DOCKET NO. _____

**APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES**

Pursuant to applicable Tennessee Statutes and the Rules and Regulations of the Tennessee Regulatory Authority and Section 253 of the Federal Telecommunications Act of 1996 ("Act"), United Communications, Inc. ("United Communications" or "Applicant") respectfully requests that the Tennessee Regulatory Authority ("TRA") grant to United Communications authority to provide competing local telecommunications services, including exchange access telecommunications services, within the State of Tennessee. United Communications is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services. TCA 65-4-201

In support of its Application, United Communications submits the following:

1. The full name and address of the Applicant is:

United Communications, Inc.
120 Taylor Street
Chapel Hill, Tennessee 37034
Telephone: 931.364.2289
Fax: 931.364.7202
Website: www.united.net
Toll-Free # 800.779.2227 (Customer Support)

Questions regarding this application should be directed to:

R. Dale Grimes
Bass Berry & Sims PLC
150 Third Avenue, S, Ste 2800
Nashville, Tennessee 37201
Telephone: 615.742.6244
Email: dgrimes@bassberry.com

Terri Parrilla
John Staurulakis, Inc.
7852 Walker Drive, Suite 200
Greenbelt, MD 20770
Telephone: 301.459.7590
Email: tparrilla@jsitel.com

Contact name and address at the Company is:

Tommy Welch, Director of Finance and Administration
United Communications, Inc.
120 Taylor Street
Chapel Hill, Tennessee 37034
Telephone: 931.364.2289
Fax: 931.364.7202
Website: www.united.net
Toll-Free # 800.779.2227 (Customer Support)

2. Organizational Chart of Corporate Structure: Include any pertinent acquisition or merger information.

See **Exhibit A.**

3. Corporate Information:

Applicant, United Communications, Inc., is a wholly-owned subsidiary of United Telephone Company (d/b/a United Communications) ("Parent"). Parent and Applicant may be collectively referred to herein as "United." In 2012, Applicant, formerly UTC Video

Concepts, LLC, underwent a conversion to become United Communications, Inc. (see Certificate of Conversion & Charter in Exhibit B). Applicant's financial, managerial, and technical qualifications are demonstrated in part by the certificate of franchise authority it currently holds that was issued by the TRA in 2012 (Docket No. 11-00208). Additionally, Parent, is a holder of a Certificate of Public Convenience from the TRA. Collectively United has been in business for over 70 years and operates a sophisticated network covering 520 square miles and provides dedicated local customer service to over 10,000 customers in the Middle Tennessee area.

A copy of Applicant's Certificate of Existence/Authorization in the State of Tennessee is provided in Exhibit C. The names and addresses of the directors and principal corporate officers are in Exhibit D. The biographies of the principal officers and any other key technical staff are in Exhibit E.

4. Applicant possesses the managerial, technical, and financial ability to provide local telecommunications service in the State of Tennessee as demonstrated below:

A. Financial Qualifications:

Applicant has the financial ability to render the local exchange telecommunications services for which this Application is submitted. Parent has formed Applicant for the purpose of providing the telecommunications services described herein and will provide financial, operational and managerial support to Applicant in such endeavors. Note that Applicant, holds a certificate of franchise authority issued by the TRA, which demonstrates in part its financial, managerial, and technical qualifications.

In support of its financial qualifications, Applicant submits the most recent consolidated audited financial statements provided in Exhibit F (FILED UNDER SEAL AS CONFIDENTIAL) for United Telephone Company, the parent company of the applicant,

including income statements, balance sheets, and statements of cash flow. The financial statements demonstrate that Parent and Applicant have a positive net worth and history of operating profitably in related fields. Additionally United has a significant amount of cash working capital on its balance sheet and a history of access to debt financing, proving it has access to the necessary working capital to fund its operations. Thus, Applicant asserts that it has the financial resources necessary to operate as a competitive local service provider in Tennessee.

Applicant has studied the feasibility to expand services in Middle Tennessee and has prepared a plan to carry out its expansion once it is granted approval of this Application and other legal requirements. Provided as **Exhibit G** (FILED UNDER SEAL AS CONFIDENTIAL) is the estimated cost and projected budget for its initial network expansion, including capital expenditures for network, switches, and unbundled network elements. These projects will be funded from cash flow and cash on hand and do not require additional debt financing at this time.

Further provided as **Exhibit H** is Applicant's Corporate Surety Bond as required by the Tennessee Regulatory Authority.

Because Applicant's parent is a privately held company, Applicant requests that the financial statements designated herein as Confidential Exhibits F and G be treated as confidential and filed under seal. Accordingly, copies of the confidential financial documents have been submitted in a separate envelope to the Docket Clerk, and marked "Filed Under Seal," and Applicant requests that they not be made part of the public record. Applicant is filing herewith redacted versions of these Exhibits F and G for the public record.

B. Managerial Ability:

As previously shown in **Exhibit E** to this Application, the Applicant has the managerial

expertise to successfully operate a telecommunications enterprise in Tennessee. The management team is led by William Bradford who has worked in the industry for 17 years and has a history of leading service providers dedicated to serving rural areas. Additionally, the management team has led the successful efforts of the Parent for many years and provides decades of experience in the telecommunications industry and Tennessee. These individuals have extensive experience in providing local customer service and marketing, network engineering and construction, switching, and financial leadership.

C. Technical Qualifications:

United is certainly technically qualified to provide local exchange services and related telecommunications services in Tennessee based on its over 70 year history of operating fiber and copper-based networks. Applicant's management team (reference Exhibit E) is experienced in the technical operations of telecommunications companies and has been building and operating fiber-based telecommunications networks in the State for many years. Applicant's Parent currently operates a sophisticated, fiber-rich, network covering 520 square miles of Middle Tennessee. To date, United has extended its fiber network to reach over 5,000 homes and businesses.

Applicant's services will satisfy the minimum standards established by the TRA. The company will file and maintain tariffs in the manner prescribed by the TRA and will meet minimum basic local standards, including quality of service and billing standards required of all LECs regulated by the TRA.

5. Proposed Service Areas

Although applicant intends to initially initiate service in certain Middle Tennessee areas, it seeks authority to provide local exchange telecommunications services in any territory in the State of Tennessee in order to facilitate future growth and service multi-location business

customers. Applicant plans to initially offer services in the city of Shelbyville (Bedford County) and the city of Lewisburg (Marshall County). Applicant plans to offer services in areas that are contiguous and in close proximity with the present ILEC service area of its Parent, United Telephone Company, where it operates regional fiber networks connecting its exchanges and surrounding areas.

6. Types of Local Exchange Service to be provided:

United Communications expects to offer a broad variety of local exchange service, IP services, and broadband Internet services primarily to business customers in Tennessee through the use of its own facilities, resold facilities and through a combination of these provisioning methods. Applicant intends to extend its fiber into contiguous areas in order to provide diversified telecommunications services including, but not limited to, toll, local exchange, access, private line, voicemail, broadband internet, vertical features and related services and intends to build its own facilities and lease facilities as appropriate in order to provide these services. United Communications' initial line of local services will be comparable to that currently offered by incumbent LECS. Initially United Communications plans to offer basic access line service, PBX and DID Services, Optional Calling Features, Directory Assistance, Directory Services, and Operator Services, as well as all services required under Chapter 1220-4-8-.04 (3) (6) and (2).

7. Repair and Maintenance:

United Communications understands the importance of effective customer service for local service customers. United Communications has made arrangements for its customers to call the company at its toll-free customer service number 800.779.2227. In addition, customers may walk in at its local service center in Chapel Hill, TN, contact the company in writing at the headquarters address, as well as via email at support@united.net. The toll free number

will be printed on the customer's monthly billing statements. All contact information will be posted and updated on the Applicant's website. The contact person knowledgeable about provider's operations is Tommy Welch, Director of Finance and Administration.

8. Small and Minority-Owned Telecommunications Business Participation Plan
(65-5-112): Exhibit I

Applicant has an existing Small and Minority-Owned Telecommunications Business Participation Plan that is filed annually with the TRA. Applicant will continue to adhere to the plan currently on file with the TRA.

9. Notice of Filing: Exhibit K

Applicant has served notice of this application to the eighteen (18) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. See Exhibit K for the list of carriers.

10. Numbering Issues: Statement provided in Exhibit L

11. Tennessee Specific Operational Issues: Statements provided in Exhibit M

12. Miscellaneous:

A. Sworn Pre-filed testimony: Exhibit N

B. Applicant does not require customer deposits. If deposits are required in the future they will fully comply with the applicable rules and regulations of the TRA regarding same.

C. As of now, the Applicant has not been subject to complaints in any of the states in which we are doing business.

D. Applicant will file and maintain tariffs in the manner prescribed by the TRA and will meet minimum basic local standards, including quality of service and billing standards required of all LECs regulated by the TRA.

CONCLUSION:

United Communications respectfully requests that the TRA enter an order granting it a certificate of convenience and necessity to operate as a competing telecommunications service provider and authority to provide a full range of local exchange services on a facilities-based and resale basis in the State of Tennessee. United Communications also respectfully requests expedited treatment for approval of its application. For the reasons stated above, United Communications' provision of these services would promote the public interest by providing high-quality service at competitive prices and by creating greater economic incentives for the development and improvement for all competing providers.

Grant of the Application will further the goals of the Tennessee Legislature and further the public interest by expanding the availability of competitive telecommunications services, especially fiber-based broadband internet in the State of Tennessee. In addition, intrastate offering of these services is in the public interest because the services will provide Tennessee customers increased efficiencies and cost savings. Authorizing United Communications to provide local exchange telecommunications services will enhance materially the telecommunications infrastructure in the State of Tennessee and will facilitate economic development.

In particular, the public will benefit both directly, through the use of the competitive services to be offered by United Communications and indirectly, because United Communications' presence in Tennessee will increase the incentives for other telecommunications providers to operate more efficiently, offer more innovative services, reduce their prices, and improve their quality of service. Grant of this

Application will further enhance the service options available to Tennessee citizens
for the reasons set forth above.

Respectfully submitted this 18 day of January, 2017



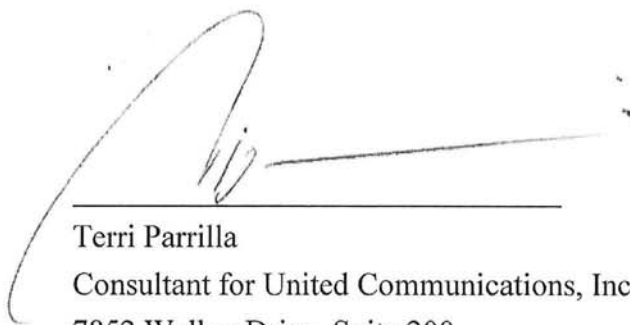
R. Dale Grimes (TN Bar No.: 6223)

Bass Berry & Sims PLC

150 Third Avenue, S, Ste 2800

Nashville, Tennessee 37201

Telephone: 615.742.6244



Terri Parrilla

Consultant for United Communications, Inc.

7852 Walker Drive, Suite 200

Greenbelt, MD 20770

Telephone: 301.459.7590

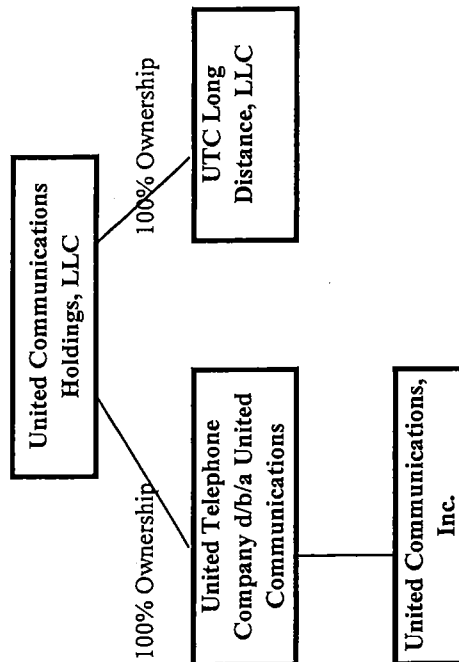
EXHIBIT A

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

**ORGANIZATIONAL CHART OF CORPORATE
STRUCTURE**

UNITED COMMUNICATIONS HOLDINGS, LLC
CORPORATE ORGANIZATION STRUCTURE - CURRENT AS OF JULY 2014.



-
1. United Communications Holdings, LLC is the holding company.
 2. United Telephone Company d/b/a United Communications is the regulated telephone company.
All employees are employees of United Telephone Company
 2. UTC Long Distance, LLC is the long distance product subsidiary.
 3. United Communications Inc is the non-regulated services subsidiary of United Telephone Company.

EXHIBIT B

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

CERTIFICATE OF CONVERSION & CHARTER



STATE OF TENNESSEE
Tre Hargett, Secretary of State
Division of Business Services
William R. Snodgrass Tower
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

United Communications, Inc.
120 TAYLOR ST
CHAPEL HILL, TN 37034-3123

July 6, 2012

Control # 450887

Effective Date: 07/06/2012

Document Receipt

Receipt #: 788525

Filing Fee: \$120.00

Payment-Check/MO - CFS, NASHVILLE, TN

\$120.00

ACKNOWLEDGMENT OF CONVERSION

**UTC VIDEO CONCEPTS, LLC converted from a TENNESSEE Limited Liability
Company to
United Communications, Inc.
a TENNESSEE Corporation For-Profit**

This will acknowledge the filing of the attached Articles of Conversion with an effective date as indicated above.

When corresponding with this office or submitting documents for filing, please refer to the control number given above.

Tre Hargett
Secretary of State

Processed By: Jennifer Smothers

State of Tennessee



Department of State
Corporate Filings
312 Eighth Avenue North
6th Floor, William R. Snodgrass Tower
Nashville, TN 37243

CERTIFICATE OF CONVERSION
(LLC into another Business Entity)

For Office Use Only

FILED

Pursuant to the provisions of §48-249-704 of the Tennessee Revised Limited Liability Company Act, the undersigned Limited Liability Company submits this certificate of conversion:

1. The current name of the of the domestic limited liability company (hereinafter referred to as the domestic LLC) is: UTC Video Concepts, LLC

If different, the name of the domestic LLC under which its articles of organization were originally filed is: _____

2. The date of filing of the original articles of organization of the domestic LLC was:

July 24, 2003 (month/day/year).

3. The name of the other business entity into which the domestic LLC is to be converted is _____
United Communications, Inc., its jurisdiction of formation is Tennessee, and its business type is a corporation.

4. All required approvals of the conversion have been obtained by the domestic limited liability company.

5. If the conversion is not to be effective upon the filing of the certificate of conversion, then the future effective date or time of the conversion is:

Date: _____ Time _____

6. The following box must be checked and the mailing address provided if the domestic LLC is converting to a foreign entity:

☐ The foreign entity agrees that it may be served with process in this State in any proceeding for the enforcement of any obligation of the domestic LLC arising prior to the date of the conversion, Irrevocably appointing the Secretary of State as its agent to accept service of process in any such proceeding. The address (including zip code) to which a copy of such process shall be mailed to it by the Secretary of State is:

July 5, 2012
Signature date

William H. Bradford
Signature

President & CEO
Signer's capacity

William H. Bradford
Name (typed or printed)

FILED

CHARTER
OF
UNITED COMMUNICATIONS, INC.

The undersigned person under the Tennessee Business Corporation Act adopts the following charter for the above listed corporation:

1. The name of the corporation is United Communications, Inc.
2. The number of shares of stock the corporation is authorized to issue is 100 shares of common stock, no par value per share.
3. The street address of the corporation's principal office is:

120 Taylor Street
Chapel Hill, Tennessee 37034
County of Marshall

4. (a) The name of the initial registered agent is Cindy L. Rothstein.
- (b) The street address of the corporation's initial registered office in Tennessee is:

120 Taylor Street
Chapel Hill, Tennessee 37034
County of Marshall

5. The name and complete address of the Incorporator is:

David Killion
150 3rd Avenue South, Suite 2800
Nashville, Tennessee 37201
County of Davidson

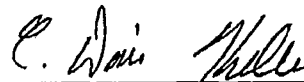
6. The shareholders of the corporation shall not have preemptive rights.
7. The corporation is for profit.

8. To the fullest extent permitted by the Tennessee Business Corporation Act as in effect on the date hereof and as hereafter amended from time to time, a director of the corporation shall not be liable to the corporation or its shareholders for monetary damages for breach of fiduciary duty as a director. If the Tennessee Business Corporation Act or any successor statute is amended after adoption of this provision to authorize corporate action further eliminating or limiting the personal liability of directors, then the liability of a director of the corporation shall be eliminated or limited to the fullest extent permitted by the Tennessee

Received by Tennessee Secretary of State Tre Hargett, 07/06/2012, 12:14:02, 7074.1132

Business Corporation Act, as so amended from time to time. Any repeal or modification of this Paragraph 8 by the shareholders of the corporation shall not adversely affect any right or protection of a director of the corporation existing at the time of such repeal or modification or with respect to events occurring prior to such time.

Dated: July 5, 2012.



David Killion, Incorporator

10689916.1

EXHIBIT C

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

CERTIFICATE OF
EXISTENCE/AUTHORIZATION



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

UNITED COMMUNICATIONS, INC.
TOMMY WELCH
P O BOX 38
CHAPEL HILL, TN 37034

January 4, 2017

Request Type: Certificate of Existence/Authorization
Request #: 0224927

Issuance Date: 01/04/2017
Copies Requested: 1

Document Receipt

Receipt #: 003032207

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3691790761

\$20.00

Regarding: United Communications, Inc.
Filing Type: For-profit Corporation - Domestic
Formation/Qualification Date: 07/24/2003
Status: Active
Duration Term: Perpetual
Business County: MARSHALL COUNTY

Control #: 450887
Date Formed: 07/24/2003
Formation Locale: TENNESSEE
Inactive Date:

CERTIFICATE OF EXISTENCE

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

United Communications, Inc.

* is a Corporation duly incorporated under the law of this State with a date of incorporation and duration as given above;

* has paid all fees, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

* has filed the most recent annual report required with this office;

* has appointed a registered agent and registered office in this State;

* has not filed Articles of Dissolution or Articles of Termination. A decree of judicial dissolution has not been filed.

Tre Hargett
Secretary of State

Processed By: Cert Web User

Verification #: 020612214

EXHIBIT D

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

DIRECTORS & PRINCIPAL CORPORATE
OFFICERS

EXHIBIT D
DIRECTORS & PRINCIPAL CORPORATE OFFICERS

DIRECTORS:

Mark L. Feidler
3050 Peachtree Road NW
Suite 550
Atlanta GA 30305

Michael D. Long
3050 Peachtree Road NW
Suite 550
Atlanta GA 30305

Barry L. Boniface
3050 Peachtree Road NW
Suite 550
Atlanta GA 30305

William H. Bradford
120 Taylor St
Chapel Hill TN 37034

Eugene B. Johnson
120 Taylor St
Chapel Hill TN 37034

OFFICERS	120 Taylor Street, Chapel Hill, TN 37034
NAME	OFFICE
Eugene B. Johnson	Chairman of the Board of Directors
William H. Bradford	President and Chief Executive Officer
Michael F. Jury	Chief Operating Officer
Tommy S. Welch	Vice President, Secretary, & Assistant Treasurer

EXHIBIT E

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

**BIOGRAPHIES OF PRINCIPAL OFFICERS & KEY
MANAGEMENT EMPLOYEES**



BIOGRAPHIES OF PRINCIPAL OFFICERS & KEY MANAGEMENT EMPLOYEES

William Bradford, President & Chief Executive Officer:

William Bradford is the President & CEO of United Communications, an entity he formed in partnership with Gene Johnson and MSouth Equity Partners, providing telecommunications services to over 10,000 residential and business customers in Middle Tennessee. William is a telecommunications management executive with broad operations, M&A, and corporate finance expertise, including direct industry experience acquiring cable television and telephone operations around the Country. Prior to founding United Communications, William was President of JB Capital Advisors, LLC, providing transaction, finance, and strategic advisory services to business executives and investors. William spent 7 years at FairPoint Communications, Inc., where he served as the Vice President of Corporate Development, responsible for strategic planning, mergers and acquisitions, and financial analysis. From 2006 to 2008, William was a member of the management team of American Broadband Communications, where he was responsible for acquisitions, corporate finance, and strategic initiatives. William has been an active participant in state and federal industry associations and is a frequent speaker on the state of M&A and the Industry. William serves as Vice Chairman of IRIS Networks, a leading provider of wholesale telecommunications services, specializing in tower backhaul solutions for wireless carriers and regional fiber transport for large carriers and enterprises. IRIS operates a state of the art fiber optic network, using leading edge IP/MPLS Ethernet technologies strategically deployed with over 5,000 route miles in the Southeast with 116 POP locations located in 6 states including super POP sites in Chicago and Atlanta. William currently serves as Vice Chairman of the Board of Directors of Adolfsen & Peterson Construction, one of the hundred largest general contractors in the US. William graduated cum laude from Wake Forest University, with a degree in Mathematical Economics. William currently lives in Brentwood, TN with his wife and four young children.

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net

Mike Jury, Chief Operating Officer

Mr. Jury has been with United since 2016, bringing 30 years of executive experience in the telecommunications industry. Prior to United, Mr. Jury served as the CEO of the City of Salisbury's fiber operations, where he was brought in to turn around a failed municipal fiber over-build. Mr. Jury was President of M&K Consulting which helped telecommunications companies across the US and Caribbean with operational and technical issues. Before turning around Salisbury Mr. Jury owned and operated rural cable TV companies in south GA and north FL deploying broadband and commercial services to underserved areas. Mr. Jury was the CEO of Mediastream, a regional cable operator in Georgia. From 1987 through 2008, Mr. Jury served in senior technical roles at some of the largest cable and fiber operators in the country, including RCN, WOW, Baja Broadband, and Broadstripe, where he was the Chief Technology Officer.

Jaimy Cooper, Director of Network Engineering

Mr. Cooper has been with United since 2005 and is responsible for all core network operations, focused on building a consistent and reliable network capable of delivering faster internet speeds, digital IPTV, cloud-based phone services, and enterprise Ethernet services, enabling the company to achieve revenue growth targets and improve customer satisfaction. Previously, Mr. Cooper worked for Spirit Telecom in South Carolina, where he gained relevant experience as a network engineer supporting numerous independent telephone companies to achieve network optimization to support multiple services such as IPTV, Internet, and VoIP. Jaimy currently holds CICA, CICE, and BAIS certifications. Mr. Cooper served 8 years in the US Marine Corps, achieving the rank of Corporal and participating in Operation Desert Shield (Iraq) and Operation Restore Hope (Somalia).

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net

Missy Michaels, Director of Marketing & Customer Engagement

Ms. Michaels has been with United since 2012 and is responsible for all marketing, sales, community relations, customer service, and related activities, focused on building brand equity and driving aggressive sales, revenue growth, and customer satisfaction. Missy has a background in advertising account management having worked with some of the most successful agencies in the Southeast, including BBDO in Atlanta where she was part of the team responsible for the launch of Cingular Wireless (AT&T Wireless) and later for Gish, Sherwood & Friends (GS&F) in Nashville. Missy graduated with a Communications Degree from the University of Georgia where she was a National Championship varsity swimmer.

Scott Niehaus, Director of Engineering & Construction

Mr. Niehaus has been with United since 2012, where he is responsible for all engineering and construction operations in the field, focused on aggressively expanding United's FTTP network at an industry-leading cost per passing and safety record, enabling the company to pass as many new premises each year with its annual capital budget. Prior to joining United, Scott worked in the consulting engineering field for Osmose Communications (formerly TelPlexus, Inc.) for ten years, serving on over 45 engineering projects in the Southeast, assisting rural carriers deploy point-to-point transmission fiber, fiber-to-the-remote, and fiber-to-the-home networks. Prior to his telecommunications experience, Scott started his career in the civil engineering field, gaining practical experience working on civil site design, landfill design, wastewater treatment plant design, and erosion and sediment control measures.

Tommy Welch, Director of Finance and Administration:

Mr. Welch has been with United since 1996 and is responsible for finance, accounting, tax, inventory, regulatory, and administration at United. Previously Mr. Welch worked for Paragould City Light, Water and Cable (PCLW), where he gained relevant experience as PCLW was one of the first utilities to enter the CATV market. AT PCLW, Mr. Welch was responsible for customer billing, record administration, and the integration of all software systems to support the launch of cable services. Mr. Welch holds his associates degree in Accounting and Electronic Data Processing from Jackson State Community College.

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net

BIOGRAPHIES OF KEY BOARD MEMBERS

Gene Johnson, Chairman:

Mr. Johnson is the retired Chairman and Chief Executive Officer of FairPoint Communications, Inc., the parent company for 32 independent telephone companies and 5 cable television companies. Mr. Johnson co-founded FairPoint in 1990 and was chief executive officer from January 2002 until his retirement in June, 2009. Mr. Johnson previously owned a cable television construction company and later became head of the mergers & acquisitions group of Cable Investments, Inc., where he executed on a broad array of transaction in the cable television industry. A former captain in the U.S. Army, Mr. Johnson started his career as a certified public accountant. Mr. Johnson is a past chairman of the board of trustees for the University of North Carolina at Charlotte and currently serves as the chair of the foundation. Additionally, Mr. Johnson serves on the board of North Carolina Amateur Sports

Mark Feidler, Board Member:

Mark is a Partner at MSouth and is a Director of United Communications Holdings, LLC. Mark joined MSouth in 2007 as a Partner and co-founder. Prior to MSouth, Mr. Feidler amassed 15 years of M&A / transactional experience, coupled with ten years in various roles in executive-level operating positions. Mr. Feidler served as President and COO of BellSouth Corporation until its merger with AT&T in December 2006. Previously, from 2000 to 2003, Mr. Feidler was the COO of Cingular Wireless, commencing upon the formation of Cingular when BellSouth and AT&T (formerly SBC) merged their domestic wireless operations to form Cingular. From 1991 to 2000, Mr. Feidler served as the head of corporate development for BellSouth and as President of various operating subsidiaries. From 1986 to 1990, Mr. Feidler worked in the investment banking department of The Robinson-Humphrey Company, Inc. From 1981 to 1986, Mr. Feidler was an associate in the corporate law section of King & Spalding. Mr. Feidler holds a B.A. (1978) in Economics from Duke University and a J.D. (1981) from Vanderbilt Law School.

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net

About MSouth Equity Partners:

MSouth Equity Partners (www.msouth.com) is a private equity investment firm that provides equity capital and expertise to support management teams in acquisitions and recapitalizations of lower middle market companies typically valued at \$25 – \$150 million. Based in Atlanta, Georgia, MSouth invests primarily in the South with a consistent focus on management buyouts. MSouth is a successor to Cravey, Green & Wahlen, Inc. which was founded in 1984. Since 1994, MSouth and its predecessor Funds have invested approximately \$620mm in 27 companies, making it one of the leading private equity firms focused exclusively on the South. Currently, MSouth is pursuing investment opportunities from its third fund. Fund I, which closed in 2008, has committed capital of \$264mm from which it has invested into 9 companies. These 9 companies generate over \$1 billion in annual revenue and employ over 20,000 people. In early August 2011, MSouth announced the closing of Fund II with approximately \$187mm of new commitments. Fund II is targeting approximately \$435mm in aggregate capital commitments. In 2015, MSouth announced the closing of its most recent fund with an aggregate capital commitment of approximately \$584mm. Each of MSouth's partners has extensive experience in acquiring and successfully growing businesses. This experience, coupled with the firm's commitment to having its partners actively support each company, contributes to the firm's long and successful investment record.

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net

EXHIBIT F

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

2015 CONSOLIDATED, AUDITED FINANCIAL
STATEMENTS

Filed Under Seal

EXHIBIT G

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

PROJECTED BUDGET

FILED UNDER SEAL

EXHIBIT H

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

CORPORATE SURETY BOND

TENNESSEE REGULATORY AUTHORITY

TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #: 018014249

WHEREAS, United Communications Inc. (the "Principal"), has applied to the Tennessee Regulatory Authority for authority to provide telecommunications services in the State of Tennessee; and

WHEREAS, under the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated, as amended, the Principal is required to file this bond in order to obtain such authority and to secure the payment of any monetary sanction imposed in any enforcement proceeding brought under Title 65 of the Tennessee Code Annotated or the Consumer Telemarketing Act of 1990 by or on behalf of the Tennessee Regulatory Authority (the "TRA"); and

WHEREAS, Liberty Mutual Insurance Company (the "Surety"), a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to issue this bond in order to permit the Principal to comply with the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated;

NOW THEREFORE, BE IT KNOWN, that we the Principal and the Surety are held and firmly bound to the STATE OF TENNESSEE, in accordance with the provisions of Tennessee Code Annotated, Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand dollars (\$20,000.00) lawful money of the United States of America to be used for the full and prompt payment of any monetary sanction imposed against the Principal, its representatives, successors or assigns, in any enforcement proceeding brought under Title 65 of Tennessee Code Annotated or the Consumer Telemarketing Act of 1990, by or on behalf of the TRA, for which obligation we bind ourselves, our representatives, successors and assigns, each jointly and severally, firmly and unequivocally by these presents.

This bond shall become effective on the 10th day of January, 2017 and shall be continuous; provided, however, that each annual renewal period or portion thereof shall constitute a new bond term. Regardless of the number of years this bond may remain in force, the liability of the Surety shall not be cumulative, and the aggregate liability of the Surety for any and all claims, suits or actions under this bond shall not exceed Twenty Thousand Dollars (\$20,000.00). The Surety may cancel this bond by giving thirty (30) days written notice of such cancellation to the TRA and Principal by certified mail, it being understood that the Surety shall not be relieved of liability that may have accrued under this bond prior to the date of cancellation.

PRINCIPAL

United Communications Inc
Name of Company authorized by the TRA

Company ID # as assigned by TRA

SIGNATURE OF PRINCIPAL

Tommy Welch

Name: Tommy Welch
Title: Insurance Manager

SURETY

Liberty Mutual Insurance Company
Name of Surety

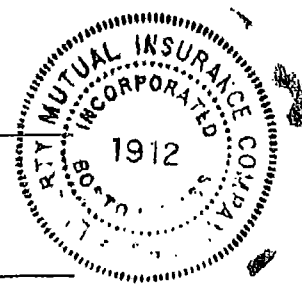
175 Berkeley St. Boston MA, 02112 USA
Address of Surety

SIGNATURE OF SURETY AGENT

Cheryl L. Condee

Name: Cheryl L. Condee
Title: Attorney in Fact

Address of Surety Agent:
6301 Ivy Lane Suite 506
Greenbelt, MD 20770



THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)

EXHIBIT I

UNITED COMMUNICATIONS

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

SMALL AND MINORITY-OWNED
TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN



SMALL & MINORITY OWNED BUSINESS PARTICIPATION PLAN

Updated: June 2015

**SMALL AND MINORITY-OWNED BUSINESS
PARTICIPATION PLAN**

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- 2.0 DEFINITIONS
- 3.0 POLICY STATEMENT AND ADMINISTRATION
- 4.0 RECORDS AND COMPLIANCE REPORTS

1.0 PURPOSE

- 1.1 United is committed to promoting and maintaining the purchase of goods and services from qualified small and minority-owned businesses, as defined herein. As a locally operated small business, we recognize the challenges of building and growing a small business and want to do our part to support other businesses serving our industry.
- 1.2 United is committed to meeting the obligations required by Section 16 of the Tennessee Telecommunications Act of 1995, codified as T.C.A. § 65-5-112. The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. United is committed to the goals of § 65-5-112 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. United will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, United will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to United of such opportunities. Moreover, United will seek to increase awareness of such opportunities so that qualified companies not otherwise identified will have sufficient information to participate in the procurement process.
- 1.3 United is committed to meeting the obligations required by Public Chapter 932 of 2008, known as the Competitive Cable and Video Services Act (the "Act"), codified as T.C.A. § 7-59-318. Pursuant to T.C.A. § 7-59-313, as amended, United maintains a minority-owned business participation plan. The purpose of T.C.A. § 7-59-313 is to provide opportunities for minority-owned businesses to provide goods and services to video and cable service providers. United is committed to the goals of § 7-59-313 and to taking steps to support the participation of minority-owned businesses in the Telecommunications industry. United will endeavor to provide opportunities for minority-owned businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, United will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to United of such opportunities. Moreover, United will seek to increase awareness of such opportunities so that qualified companies not otherwise identified will have sufficient information to participate in the procurement process.
- 1.4 The Administration of this Plan is the responsibility of United. It is the policy of United to provide an opportunity for small and minority-owned businesses, as defined herein, to compete for subcontracts awarded by United on a fair and equitable basis with qualified suppliers and contractors.
- 1.5 This plan is a state of objectives and is not intended to create any legal obligations of United or any other person.

2.0 DEFINITIONS

- 2.1 **"United"** – For the purpose of this Plan, United shall include United Telephone Company, its wholly-owned subsidiary, United Communications, Inc. (formerly UTC Video Concepts, LLC) and UTC Long Distance, LLC.
- 2.2 **"Minority Owned Business"** – (as defined in T.C.A. § 65-5-112) "Minority-Owned Business" shall mean a business which is solely owned, or at least fifty-one percent (51%) of the outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or

national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

– (as defined in T.C.A. § 7-59-313) "Minority-Owned Business" additionally shall mean a business which is solely owned, or at least fifty-one percent (51%) of the outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of:

- A. Past practices of discrimination based on race, religion, ethnic background, or sex, including, but not limited to, women;
- B. A disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
- C. Past practices of racial discrimination against African-Americans.

- 2.3 "Small Business" – (as defined in T.C.A. § 65-5-112) For the purpose of this Plan, "Small Business" means a business with annual gross receipts of less than four million dollars (\$4,000,000).

3.0 POLICY STATEMENT & ADMINISTRATION

- 3.1 It is the policy of United to afford Small Businesses and Minority-Owned Businesses and opportunity to participate in the performance of contracts in accordance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313.
- 3.2 United's Plan will be overseen and administered by the individual named below, which may change from time-to time, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting United's full efforts to provide equal opportunities for Small Business and Minority-Owned Businesses.
- 3.3 The Administrator of the Plan will be:

Mrs. Lisa Hedgepeth
Purchasing Agent
120 Taylor Street
P. O. Box 38
Chapel Hill, Tennessee 37034
Telephone: 931.364.4329; Fax: 931.364.7202

- 3.4 The Administrator's specific job duties, as they relate to this Plan are as follows:
- A. Maintaining an updated plan in full compliance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313 and the rules and orders of the Tennessee Regulatory Authority.
 - B. Establishing and developing policies and procedures for the successful implementation of the Plan.
 - C. Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
 - D. Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and

Small Businesses and Minority-Owned Businesses to locate and use qualified businesses as defined in T.C.A. § 65-5-112 and T.C.A. § 7-59-313.

- E. Searching for and developing opportunities to use Small Businesses and Minority-Owned Businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- F. Providing records and reports and cooperate in any authorized surveys as required by the Tennessee Regulatory Authority.
- G. Establishing a record-keeping system to track qualified Small Businesses and Minority-Owned Businesses and efforts to use such businesses.
- H. Providing information and educational activities to persons within United and training such persons to seek out, encourage, and promote the use of Small Businesses and Minority-Owned Businesses.

In performance of these duties, the Administrator will utilize a number of resources, including:

- Chambers of Commerce
- The Tennessee Department of Economic and Community Development
- The United States Department of Commerce
 - Small Business Administration
 - Office of Minority Business
- The National Minority Supplier Development Counsel
- The National Association of Women Business Owners
- The National Association of Minority Contractors
- Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for Small Business and Minority-Owned Business are primarily spelled out in the Administrator's duties above. Additional efforts will include offering technical assistance, where appropriate and feasible, to Small Businesses and Minority-Owned Businesses.

4.0 RECORDS AND COMPLIANCE REPORTS

- 4.1 United will maintain records of qualified Small Businesses and Minority-Owned Businesses and efforts to use such goods and services of such businesses. In addition, United will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.
- 4.2 United will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. United will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

EXHIBIT J

Intentionally Omitted

EXHIBIT K

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

NOTICE OF FILING

EXHIBIT K

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN THE MATTER OF THE APPLICATION)
OF UNITED COMMUNICATIONS, INC. FOR A)
CERTIFICATE TO PROVIDE COMPETING)
LOCAL TELECOMMUNICATIONS SERVICES)

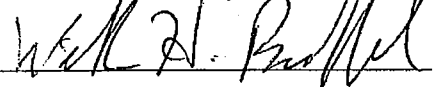
NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the Tennessee Regulatory Authority Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that on January 18, 2017, United Communications, Inc. filed an Application for a Certificate of Public Convenience and Necessity to Provide Competing Local Telecommunications Services. A copy of this notice was also submitted to the Tennessee Regulatory Authority.

This 18 day of January __, 2017.

United Communications, Inc.

BY: 

William Bradford
President & CEO

TENNESSEE INCUMBENT LOCAL EXCHANGE CARRIERS

1. Ardmore Telephone Company
2. BellSouth Telecommunications, LLC
3. CenturyTel of Adamsville
4. CenturyTel of Claiborne
5. CenturyTel of Ooltewah-Collegedale
6. Concord Telephone Exchange, Inc.
7. Crockett Telephone Company
8. Frontier Communications of Tennessee
9. Frontier Communications Of The Volunteer State
10. Humphreys County Telephone Company
11. Loretto Telephone Company
12. Millington Telephone Company, Inc.
13. Peoples Telephone Company
14. Tellico Telephone Company
15. Tennessee Telephone Company
16. United Telephone Company, Inc. No
17. United Telephone Southeast, LLC
18. West Tennessee Telephone Co.

EXHIBIT L

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

NUMBERING ISSUES

UNITED COMMUNICATIONS, INC.

NUMBERING ISSUES

Please provide answers to the following questions concerning numbering within your proposed service areas.

1. What is your company's expected demand for NXXs per NPA within a year of approval of your application?

Response: At minimum, United Communications, Inc. will request 1 NXX for the purpose of an LRN during the first year of service following approval of its application.

2. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?

Response: United Communications, Inc. estimates that the maximum number of NXXs it may request for service in the AT&T territory is ten (10).

3. When and in what NPA do you expect to establish your service footprint?

Response: United Communications, Inc. initially will provide local service throughout the 615, 629 and 931 NPAs currently served by AT&T.

4. Will the company sequentially assign telephone numbers within NXXs?

Response: In the event that United Communications, Inc.'s operations necessitate assigning telephone numbers, it will try to assign such numbers sequentially within NXXs; however, customer demand may alter the sequential assignment.

5. What measures does the company intend to take to conserve Tennessee numbering resources?

Response: United Communications, Inc. will only obtain numbering when necessary (i.e LRNs, 1k blocks) .

6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

Response: United Communications, Inc. will base the need on 75% utilization of a thousand block and/or an NXX.

EXHIBIT M

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

TENNESSEE SPECIFIC OPERATIONAL ISSUES

EXHIBIT M
Tennessee Specific Operational Issues

Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.

Answer: United Communications, Inc. will use its Parent, United Telephone Company, as its bill processor. With over 70 years of billing and compliance history in the state of Tennessee, United already complies with this mandate and has systems in place to properly measure and bill (or not bill) calls within each county.

2. Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers in the database?

Answer: Yes, United is aware of the TN County Wide Calling database. United Communications, Inc. will use its Parent, United Telephone Company, as its records processor. As an ILEC in the state of Tennessee with 70 years of experience their ability to load numbers into the county wide calling database is already in effect.

3. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service areas?

Answer: Yes, as an operator in the state for over 70 years we are aware of the calling areas. Additionally, we have access to the standard databases detailing these areas.

4. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro calling areas.

Answer: United Communications, Inc. will use its Parent, United Telephone Company, as its bill processor. With over 70 years of billing and compliance history in the state of Tennessee, United already complies with these requirements and has the systems in place to properly identify, measure, and bill (or not bill) metro calling.

5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.

Answer: Missy Michaels, Director of Marketing and Customer Engagement,
931.364.4354.

6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 et seq. and Chapter 1220-4-11?

Answer: The applicant does not intend to use telemarketing initially, but is aware of the statutes and regulations and will follow them in any telemarketing campaign.

Filename: Exhibit M - Tennessee Specific Operational Issues
Directory: E:\JSI Active\#INTERCONNECTION\United Communications (TN)\TN
CLEC Certification\Draft Docs for Submission
Template: C:\Users\terrigo\AppData\Roaming\Microsoft\Templates\Normal.dotm
Title: Microsoft Word - Exhibit M - Tennessee Specific Operational Issues
Subject:
Author: Terrigo
Keywords:
Comments:
Creation Date: 1/17/2017 9:06:00 AM
Change Number: 2
Last Saved On: 1/17/2017 2:08:00 PM
Last Saved By: Terri Parrilla
Total Editing Time: 1 Minute
Last Printed On: 1/17/2017 2:08:00 PM
As of Last Complete Printing
Number of Pages: 3
Number of Words: 409 (approx.)
Number of Characters: 2,335 (approx.)

EXHIBIT N

UNITED COMMUNICATIONS, INC.

TENNESSEE REGULATORY AUTHORITY
APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES

SWORN PRE-FILED TESTIMONY

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

APPLICATION OF UNITED COMMUNICATIONS, INC.
FOR A CERTIFICATE TO PROVIDE
COMPETING LOCAL TELEPHONE SERVICES

PRE-FILED TESTIMONY OF TOMMY WELCH

I, Tommy Welch, do hereby testify as follows in support of the application of United Communications, Inc. ("UCI") for a Certificate of convenience and necessity as a competing telecommunications services provider to provide telecommunication services throughout the State of Tennessee.

Q: Please state your full name, business address, and position.

A: My name is Tommy Welch. I am the Director of Finance and Administration. My business address is United Communications, PO Box 38, Chapel Hill, Tennessee, 37034.

Q: Please briefly describe your duties.

A: I am responsible for all financial, regulatory, and administrative duties of United, including ensuring compliance with federal, state, and local regulations. Additionally, I support United's broadband growth initiatives from a finance and regulatory perspective.

Q: Please describe your business experience and educational background.

A: Please see my bio attached to Exhibit E. In addition to over 20 years of experience at United, I previously worked at a municipal utility in Arkansas, where I supported their expansion into the internet and TV business.

Q: Are all statements in UCI's application true and correct to the best of your knowledge, information and belief?

A: Yes

Q: Please describe the current corporate structure of UCI.

A: UCI is a wholly owned subsidiary of United Telephone Company (d/b/a United Communications), which is a certificated Incumbent Local Exchange Carrier in the State of Tennessee. The organization structure is depicted in Exhibit A of this application.

Q: Does UCI possess the requisite managerial, financial, and technical abilities to provide the services for which it has applied for authority?

A: Yes. UCI's managerial, financial, and technical abilities are described in the Petition and accompanying exhibits. Please note that the TRA has previously determined that UCI possess the managerial, financial, and technical abilities required to receive a Certificate of Statewide Franchise, which was granted in 2012.

Q: Please describe UCI's financial qualifications.

A: Financial information relating to UCI is provided in Exhibit F of the petition, which is CONFIDENTIAL AND PROPRIETARY. UCI's parent company has been in business for almost 70 years and combined with UCI, maintains adequate cash and working capital to support its broadband growth initiatives.

Q: Please describe UCI's managerial and technical qualifications.

A: Applicant's Parent currently operates a sophisticated, fiber-rich, network covering 520 square miles of Middle Tennessee. The management team has led the successful efforts of the Parent for many years and provides decades of experience in the telecommunications industry and Tennessee. These individuals have extensive experience in providing local customer service and marketing, network engineering and construction, switching, and financial leadership.

Q: What services will UCI offer?

A: United Communications expects to offer a broad variety of local exchange service, IP, and broadband internet services through the use of its own facilities, resold facilities, and through a combination of these provisioning methods.

Q: Will UCI offer service to all consumers within its service area?

A: Yes, as it is requested.

Q: Will the granting of a certificate of convenience and necessity to UCI serve the public interest?

A: Yes. Grant of the Application will further the goals of the Tennessee Legislature and further the public interest by expanding the availability of competitive telecommunications services, especially fiber-based broadband internet in the State of Tennessee.

Q: Does UCI intend to comply with all TRA rules, statutes, and orders pertaining to the provision of telecommunications services in Tennessee, including those for disconnection and reconnection of service?

A: Yes

Q: Has any state ever denied UCI or one of its affiliates authorization to provide intrastate service?

A: No.

Q: Has any state ever revoked the certification of UCI or one of its affiliates?

A: No.

Q: Has UCI or one of its affiliates ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?

A: No.

Q: Who is knowledgeable about United Communications, Inc.'s operations and will serve as UCI's regulatory and customer service contact?

A: Tommy Welch (Regulatory) and Missy Michaels (Customer Service)

Q: Please explain in detail UCI's proposed procedures for responding to information requests from the TRA and its staff.

A: United proposes to respond to questions and requests for information from the TRA and staff via multiple contact methods, including by telephone at 931.364.2289, by email at support@united.net, and/or by postal mail at:

United Communications, Inc.
120 Taylor Street
Chapel Hill, Tennessee 37034

Q: Does this conclude your testimony?

A: Yes

I swear that the foregoing testimony is true and correct to the best of my knowledge.

Tommy Welch

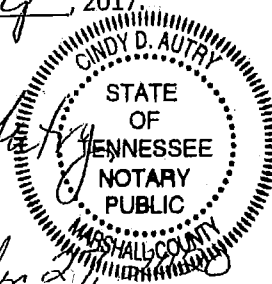
Tommy Welch
Director of Finance and Administration
United Communications, Inc.

State of Tennessee
County Of Marshall

I, the undersigned, a notary public in and for said county in said state, hereby certify that Tommy Welch, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 9 day of January, 2017.

Cindy D. Autry
Notary Public



My commission expires: July 2, 2018