

BUTLER | SNOW

March 9, 2017



VIA HAND DELIVERY

Hon. David Jones, Chairman
c/o Sharla Dillon
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: In Re: Application of Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks to Expand its Certificate of Convenience and Necessity to Operate Statewide as a Competitive Local Exchange Carrier Providing a Full Array of Intrastate Telecommunications Services, TRA Docket No. 17-00022

Dear Chairman Jones:

Enclosed please find one (1) original and thirteen (13) copies of the *Application of Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks to Expand its Certificate of Convenience and Necessity to Operate Statewide as a Competitive Local Exchange Carrier Providing a Full Array of Intrastate Telecommunications Services* (the "Application"). Also enclosed is a check in the amount of \$25.00 for the required filing fee. Please note that Exhibit E to the Application is being submitted **UNDER SEAL** as **CONFIDENTIAL** and **PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of Exhibit E are attached.

Finally, one (1) additional copy of the Application is enclosed to be filed-stamped for our records. If you have any questions or require additional information, please let us know.

Very truly yours,

BUTLER SNOW LLP

Melvin J. Malone

clw
Enclosures

The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201

35653655v1

MELVIN J. MALONE
615.651.6705
melvin.malone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

BUTLER SNOW LLP

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

APPLICATION OF TENNESSEE
INDEPENDENT TELECOMMUNICATIONS
GROUP, LLC D/B/A IRIS NETWORKS TO
EXPAND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY TO
OPERATE STATEWIDE AS A
COMPETITIVE LOCAL EXCHANGE
CARRIER PROVIDING A FULL ARRAY OF
INTRASTATE TELECOMMUNICATIONS
SERVICES

DOCKET NO.

17-00022

**APPLICATION OF TENNESSEE INDEPENDENT TELECOMMUNICATIONS
GROUP, LLC D/B/A IRIS NETWORKS FOR AN EXPANDED CERTIFICATE OF
CONVENIENCE AND NECESSITY TO OPERATE STATEWIDE AS A COMPETITIVE
LOCAL EXCHANGE CARRIER**

The Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks (“IRIS” or “Applicant”), by and through its undersigned counsel, and pursuant to Tenn. Code Ann. §§ 65-4-201 through 65-4-204 and Chapter 1220-4-8 of the Rules and Regulations of the Tennessee Regulatory Authority (“TRA” or “Authority”), as applicable, hereby submits this *Application of Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks for An Expanded Certificate of Public Convenience and Necessity to Operate Statewide as a Competitive Local Exchange Carrier* (the “Application”) and herein applies to modify its existing Certificate of Public Convenience and Necessity for authority to provide intrastate telecommunications services statewide as a Competitive Local Exchange Carrier (“CLEC”).¹

¹ Pursuant to Chapter 1220-4-8-.04(3)(a) of the Rules and Regulations of the Tennessee Regulatory Authority, a petition to modify a certificate must be acted upon “within sixty (60) days of filing.”

I. INTRODUCTION AND BACKGROUND

In the *2004 IRIS Order*, the Authority found that IRIS satisfied the managerial, technical and financial requirements set forth in Tenn. Code Ann. § 65-4-201(c) to provide certain telecommunications services within the State of Tennessee and also approved IRIS's request for approval of a franchise agreement with the City of Knoxville, Tennessee pursuant to Tenn. Code Ann. § 65-4-107.² The Authority also determined that the Small and Minority-Owned Telecommunications Business Participation Plan submitted by Iris in TRA Docket No. 03-00581 pursuant to Tenn. Code Ann. § 65-5-212 was acceptable.³ Further, since the issuance of the *2004 IRIS Order* by the Authority, IRIS has demonstrated the ability and willingness to adhere to all applicable TRA policies, rules and orders. As demonstrated below, the granting of this *Application* will provide significant benefits to Tennessee consumers and thereby serve the public interest. In order to serve the public interest in a timely manner, IRIS respectfully requests expedited approval of this *Application*.

In support of its *Application*, IRIS respectfully submits the following.

II. DESCRIPTION OF THE APPLICANT

1. Legal Name and Address of Applicant. Applicant's legal name is Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks. IRIS maintains its principal place of business at 211Commerce Street, Suite 610, Nashville, TN 37201.

2. Contact Person. Correspondence or communications pertaining to this *Application* should be directed to:

² See *Order Approving Application For Certificate of Public Convenience and Necessity*, In Re: Application of Tennessee Independent Telecommunications Group, LLC d/b/a Iris Networks for a Certificate of Public Convenience and Necessity to Provide Competitive Access Services and Transport Telecommunications Services within the State of Tennessee and Approval of the Franchise Agreement with the City of Knoxville, TRA Docket No. 03-00581 (May 18, 2004) ("*2004 IRIS Order*").

³ *Id.*

Melvin J. Malone
Butler Snow LLP
150 Third Avenue South, Suite 1600
Nashville, TN 37201
Telephone (615) 651-6705
melvin.malone@butlersnow.com

Caroline L. Eley
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
Telephone (615) 651-6743
caroline.eley@butlersnow.com

3. Corporate Liaison. Questions concerning the ongoing operations of Iris should be directed to:

Terry Metze, President
211 Commerce Street, Suite 610
Nashville, TN 37201
Telephone (615) 425-2300
tmetze@iristansport.com

4. Organizational Chart of Corporate Structure. (Include any pertinent acquisition or merger information). See Exhibit A.

III. CORPORATE INFORMATION

IRIS is a Tennessee limited liability company (“LLC”) with its principal office located at 211 Commerce Street, Suite 610, Nashville, Tennessee 37201. A copy of IRIS’s Articles of Organization is provided in Exhibit B. The members (owners) of IRIS are: Ben Lomand Rural Telephone Cooperative, Inc., Bledsoe Telephone Cooperative, DTC Communications, Highland Telephone Cooperative, Loretto Communications Services, Inc., North Central Communications, Inc., Scott County Telephone Cooperative, Twin Lakes Telephone Cooperative, United Telephone Company and West Kentucky Rural Telephone Cooperative. An organizational chart

of the ownership structure, as well as the names and addresses of the governors of IRIS, is provided in **Exhibit C**.

IRIS provides transport services and competitive access services in the State of Tennessee, and, through contractual relationships with others, it provides transport services in North Carolina, Kentucky, West Virginia, Virginia, Maryland, Pennsylvania, Ohio, Indiana, Alabama, Georgia, South Carolina and Florida.

IV. QUALIFICATIONS

IRIS possesses the managerial, technical and financial ability to provide intrastate telecommunications services statewide.

1. **Managerial**. The Authority granted IRIS a Certificate of Public Convenience and Necessity in 2004 based, in part, upon finding that IRIS possessed the requisite managerial qualifications to provide certain telecommunications services in Tennessee.⁴ Since that time, IRIS has gained valuable experience as a telecommunications provider in Tennessee and has continued to enhance its already well-qualified personnel. IRIS is a well-established provider with experienced managers and staff. Attached hereto as **Exhibit D** is a list of the names of the Applicant's principal company officers and a brief description of each officer's background and experience.

2. **Financial Qualifications**. The Authority granted IRIS a Certificate of Public Convenience and Necessity in 2004 based, in part, upon finding that IRIS possessed the requisite financial qualifications to provide certain telecommunications services in Tennessee.⁵ IRIS remains financially qualified to provide telecommunications services statewide. IRIS submits **Exhibit E**, marked **PROPRIETARY AND CONFIDENTIAL UNDER SEAL**, its 2015 and

⁴ See 2004 IRIS Order.

⁵ *Id.*

2016 Audited Financial Statements, which confirm that IRIS is financially sound and has adequate resources to provide expanded intrastate telecommunications services statewide.

3. Technical Qualifications. The Authority granted IRIS a Certificate of Public Convenience and Necessity in 2004 based, in part, upon finding that IRIS possessed the requisite technical qualifications to provide certain telecommunications services in Tennessee.⁶ Since that time, IRIS has continued to employ well-qualified individuals with the needed technical skill-set to successfully service its customers. IRIS's personnel have gained valuable knowledge since the Authority's approval and are fully capable of operating as a statewide CLEC. Information concerning the technical expertise of IRIS's senior management team is included in Exhibit D. A list of IRIS's key technical staff, along with a brief biography and job description, are set forth in Exhibit F. Hence, IRIS remains fully qualified with the technical qualifications to provide expanded telecommunications services statewide.

V. PROPOSED AREA AND SERVICES

1. IRIS currently offers competitive access services and transport services throughout the State of Tennessee. IRIS currently provides transport services in over twenty-five (25) Tennessee counties, including Tennessee's major metropolitan markets and deep into many rural areas. Moreover, IRIS is authorized to provide competitive access services and transport services in Alabama, Kentucky, Virginia and Georgia. Presently, IRIS is a carriers' carrier that provides long haul transport to other carriers and also provides competitive access to carriers on behalf of incumbent local exchange ("ILECs) through a tandem switch.

2. As set forth more fully below, as a CLEC, IRIS proposes to offer intrastate telecommunications services across Tennessee with an expanded Certificate of Public

⁶ *Id.*

Convenience and Necessity (“CCN”) authorized by the Authority.⁷ IRIS will bring more opportunities and competition to the market, which will provide consumers with more choices.

3. To the extent that any rural incumbent local exchange carrier possesses an exemption or suspension under Section 251(f) of the Federal Communications Act (the “Act”) that applies to IRIS, IRIS does not seek interconnection under Section 251(c) at this time, nor does IRIS seek at this time to challenge any such exemption from any of the other obligations specified in Section 251(c) of the Act.

VI. TYPES OF SERVICES

1. IRIS is a wholesale carriers’ carrier that provides state of the art high speed transport for voice, video and data within the State of Tennessee, including broadband transport to many underserved rural areas of the state. IRIS supplies interexchange carriers, wireless carriers, Internet service providers, and other carriers with cost effective haul telecommunications transport via leased circuits. IRIS also provides tandem switching on behalf of ILECs.⁸ IRIS is applying to expand its CCN for the ability to provide expanded intrastate telecommunications services, including wireless Internet services and voice over Internet protocol (“VoIP”) directly to business and enterprise customers. IRIS is aware of all the requirements necessary in order to expand its offerings statewide. At this time, IRIS intends to provide end user services to medium-sized business and enterprise customers. Although IRIS may provide end user services to multi-tenant, small business and residential customers sometime in the future, IRIS has no present plans to provide end user services to multi-tenant, small business or residential customers.

⁷ See 2004 IRIS Order.

⁸ *Id.*

2. For CLEC services, IRIS plans to use leased or facility-based Ethernet and fiber-based access to provide IP services and utilize other carriers' VoIP platforms for voice services until such time as IRIS determines to provide VoIP services directly on its switching platform. IRIS will offer directory services and E911.

VII. REPAIR AND MAINTENANCE INFORMATION/PUBLIC INTEREST

1. Applicant is familiar with and will adhere to all applicable Authority policies, rules, and orders governing the provision of statewide telecommunications services in the State of Tennessee.

2. Subsequent to the approval of its *Application*, IRIS will file any necessary tariff revisions prior to expanding its service offerings beyond those already permitted under its existing CCN. Subsequent to the approval of its *Application*, IRIS will file the requisite notice for market regulation.

3. A certificate of service stating that notice of this *Application* has been served on all eighteen (18) incumbent local exchange telephone companies in Tennessee is attached hereto. See **Exhibit G** for the list.

4. IRIS has a toll-free number for customer inquiries regarding maintenance, which is listed in Section 1 of this *Application*. IRIS provides monitoring of its network 7 days a week through its network operations center, which is staffed around the clock and is equipped with audio and video alarms.

5. The granting of this *Application* will further the public interest by expanding the availability of telecommunications services consistent with state law. Specifically, Tennessee consumers will continue to benefit directly through the use of the competitive wholesale services offered by IRIS. Further, the public will benefit through the continued and expanded competitive presence of IRIS, which will increase the incentives for telecommunications

providers to operate more efficiently, offer more innovative services, reduce prices, and improve the quality and coverage of their services. The granting of this *Application* would be consistent with the public policy of the State of Tennessee, as set forth at Tenn. Code Ann. § 65-4-123, “to foster the development of an efficient, technologically advanced statewide system of telecommunications services by permitting competition in all telecommunications services market[.]”

VIII. SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

In accordance with Tenn. Code Ann. § 65-5-112, IRIS’s Small and Minority-Owned Telecommunications Business Participation Plan is provided as **Exhibit H**.⁹

IX. STATEMENT OF COMPLIANCE

Iris intends to abide by all applicable statutes and all applicable orders, rules and regulations adopted by the TRA.

X. MISCELLANEOUS

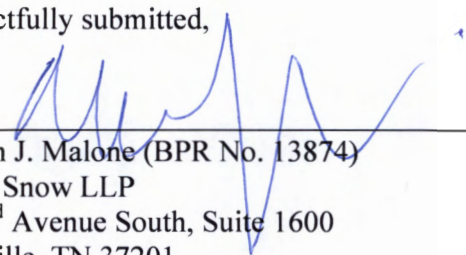
1. Sworn Pre-filed testimony. IRIS has provided pre-filed testimony in support of its Application in **Exhibit I**.

⁹ See 2004 IRIS Order.

XI. CONCLUSION

For the foregoing reasons, IRIS respectfully requests the Authority to modify its Certificate of Public Convenience and Necessity on an expedited basis authorizing IRIS to operate as a CLEC throughout the State of Tennessee.

Respectfully submitted,



Melvin J. Malone (BPR No. 13874)
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
Phone: (615) 651-6705
Fax: (615) 651-6701
Email: melvin.malone@butlersnow.com

Caroline L. Eley (BPR No. 31109)
Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
Phone: (615) 651-6743
Fax: (615) 651-6701
Email: caroline.eley@butlersnow.com

*Attorneys for Tennessee Independent
Telecommunications Group, LLC d/b/a Iris
Networks*

EXHIBIT A

Organizational Chart of Corporate Structure

See attached.

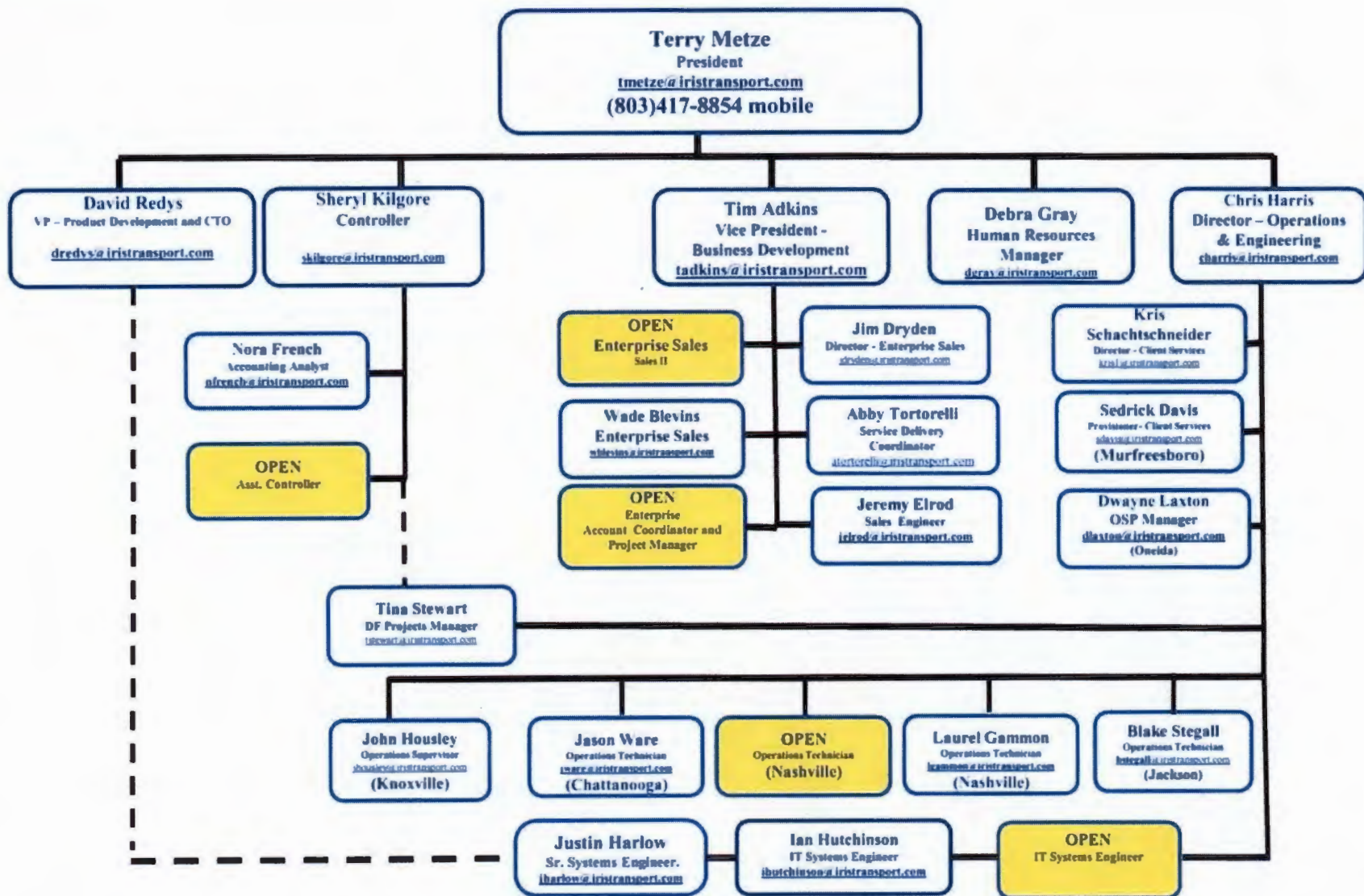


EXHIBIT B

Articles of Organization

See attached.



Department of State
Corporation Section
18th Floor, James K. Polk Building
Nashville, TN 37243-0306

TENNESSEE ARTICLES OF ORGANIZATION OF A LIMITED LIABILITY COMPANY

Per Office Use Only

RECEIVED NOV 25 AM 9:20

SECRETARY OF STATE

The undersigned acting as organizer(s) of a Limited Liability Company under the provisions of the Tennessee Limited Liability Company Act, § 48-206-101, adopts the following Articles of Organization.

1. The name of the Limited Liability Company is:

Tennessee Independent Telecommunications Group, LLC

(NOTE: Pursuant to the provisions of § 48-207-101, each Limited Liability Company name must contain the words "Limited Liability Company" or the abbreviation "LLC" or "LLC.")

2. The name and complete address of the Limited Liability Company's initial registered agent and office located in the state of Tennessee is:

Mark Patterson

(Name)

950 Main Street, Suite D Wartburg, Tennessee 37887

(Street Address)

(City)

(State/Zip Code)

Morgan

(County)

3. List the name and complete address of each organizer of this Limited Liability Company.

Mark Patterson 950 Main Street, Suite D, Wartburg, Tenn 37887

(Name)

(Include: Street Address, City, State and Zip Code)

(Name)

(Street Address, City, State and Zip Code)

(Name)

(Street Address, City, State and Zip Code)

4. The Limited Liability Company will be: (NOTE: PLEASE MARK APPLICABLE BOX)

☒ Board Managed

☐ Member Managed

5. Number of members at the date of filing 11 (Minimum of two (2).)

6. If the document is not to be effective upon filing by the Secretary of State, the delayed effective date and time is:

Date _____, 19____, Time _____ (Not to exceed 90 days.) N/A

7. The complete address of the Limited Liability Company's principal executive office is:

950 Main Street, Suite D Wartburg, Tennessee 37887

(Street Address)

(City)

(State/Country/Zip Code)

8. Period of Duration: Perpetual

9. Other Provisions:

N/A

11-19-98

Signature Date

Organizer

Signer's Capacity

Mark Patterson

Signature (manager or member authorized to sign by the Limited Liability Company)

Mark Patterson

Name (typed or printed)

4059 0338



Department of State
 Corporate Filings
 312 High Avenue North
 P.O. Box 10000, Nashville, TN 37206

APPLICATION FOR REGISTRATION
 OF ASSUMED
 LIMITED LIABILITY COMPANY NAME

For Office Use Only
 RECEIVED
 STATE OF TENNESSEE
 2000 NOV 28 AM 8:41
 CHANNEL
 SECRETARY OF STATE

Pursuant to the provisions of § 49-267-101 (a) of the Tennessee Limited Liability Company Act, the undersigned Limited Liability Company hereby submits this application:

1. The true name of the Limited Liability Company is:

Tennessee Independent Telecommunications Group, LLC

2. The state or country of organization is: Tennessee

3. The Limited Liability Company intends to transact business under an assumed Limited Liability Company name.

4. The assumed Limited Liability Company name the Limited Liability Company proposes to use is:

IRIS Networks

NOTE: The assumed Limited Liability Company name must meet the requirements of § 49-267-101 of the Tennessee Limited Liability Company Act.

November 19, 2000

Signature Date

Chief Manager

Signer's Capacity

Tennessee Independent Telecommunications Group, LLC

Name of Limited Liability Company

Ellen Bryson

Signature

Ellen Bryson

Name (typed or printed)

LIMITED LIABILITY COMPANY ANNUAL REPORT
STATE OF TENNESSEE
SECRETARY OF STATE
SUITE 1800, JAMES K. POLK BUILDING
NASHVILLE, TN 37243-0006

4123 1010

FILING FEE - \$25.00 PER MEMBER ON THE DATE OF FILING, WITH A MINIMUM FEE OF \$250.00 DOLLARS AND A MAXIMUM FEE OF \$2500.00

CURRENT FISCAL YEAR CLOSING MONTH: 12

IF DIFFERENT,

THIS REPORT IS DUE ON OR BEFORE:

04/01/01

(1) SECRETARY OF STATE CONTROL #: 0361285

FEDERAL EMPLOYER IDENTIFICATION #:

62-1762904

(2A.) NAME AND MAILING ADDRESS OF LIMITED LIABILITY COMPANY

(2B.) STATE OR COUNTRY OF FORMATION

TENNESSEE

TENNESSEE INDEPENDENT
TELECOMMUNICATIONS GROUP, LLC
950 MAIN STREET
SUITE D
WARTBURG, TN 37887

(2C.) ADD OR CHANGE MAILING ADDRESS:

Tennessee Independent
Telecommunications Group, LLC
D/B/A Iris Networks
2525 West End Ave.
4th Floor
Nashville, TN 37203

0 11/25/1998

FOR PROFIT

(3) A. PRINCIPAL ADDRESS INCLUDING CITY, STATE, ZIP CODE:

950 MAIN STREET, SUITE D, WARTBURG, TN 37887

B. CHANGE OF PRINCIPAL ADDRESS:

STREET

CITY

STATE

ZIP CODE + 4

2525 West End Avenue, 4th Floor

Nashville

TN

37203

**** BLOCK 4 MUST BE COMPLETED OR THE ANNUAL REPORT WILL BE RETURNED ****

(4) NAME AND BUSINESS ADDRESS, INCLUDING ZIP CODE, OF ITS GOVERNORS, IF BOARD MANAGED; THE MANAGERS, IF MEMBER MANAGED.
(ATTACH ADDITIONAL SHEET IF NECESSARY.)

NAME

BUSINESS ADDRESS

CITY, STATE, ZIP CODE + 4

See attached list.

☒ BOARD MANAGED

☐ MEMBER MANAGED

☐ IS THIS LLC PROHIBITED FROM ENGAGING IN BUSINESS IN TENNESSEE?

(5) A. NAME OF REGISTERED AGENT AS APPEARS ON SECRETARY OF STATE RECORDS:

MARK PATTERSON

B. REGISTERED ADDRESS AS APPEARS ON SECRETARY OF STATE RECORDS:

950 MAIN STREET, SUITE D, WARTBURG, TN 37887

(6) INDICATE BELOW ANY CHANGES TO THE REGISTERED AGENT NAME AND/OR REGISTERED OFFICE.

(BLOCK 6A AND/OR 6B.) THERE IS AN ADDITIONAL \$25.00 FILING FEE REQUIRED FOR CHANGES MADE TO THIS INFORMATION.

A. CHANGE OF REGISTERED AGENT:

Ellen Bryson

B. CHANGE OF REGISTERED OFFICE:

2525 West End Avenue, 4th Floor Nashville, TN 37203 Davidson

STREET

CITY

STATE

ZIP CODE + 4

COUNTY

(7) NUMBER OF MEMBERS AT THE DATE OF THIS FILING: 1

(8) SIGNATURE

Ellen Bryson

(9) DATE

February 8, 2001

(10) TYPE/PRINT NAME OF SIGNER:

Ellen Bryson

(11) TITLE OF SIGNER

Chief Manager

**** THIS REPORT MUST BE DATED AND SIGNED ****

CONTINUED ON BACK

**Board of Governors
Tennessee Independent Telecommunications Group, LLC
D/B/A IRIS Networks
February 8, 2001**

**Mr. Terry Wales
Ardmore Telephone Company
P. O. Box 549
517 Ardmore Avenue
Ardmore, TN 38449**

**Mr. Bill Franklin
Scott County Telephone Coop.
P.O. Box 487
121 Woodland Street
Gate City, VA 24251**

**Mr. Lewoy Knowles
Ben Lomand Rural Telephone Cooperative
P.O. Box 670
311 North Chancery Street
McMinnville, TN 37111**

**Mr. Robert Dudney
Twin Lakes Telephone Cooperative
P. O. Box 67
201 Gore Avenue
Gainesboro, TN 38562-0067**

**Mr. Greg Anderson
Bledsoe Telephone Cooperative
P.O. Box 609
203 Cumberland Ave.
Pikeville, TN 37367**

**Mr. Herb Bivens
United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034**

**Mr. Wayne Gassaway
DTC Communications
P.O. Box 247
111 High Street
Alexandria, TN 37012**

**Mr. Trevor Bonnstetter
West KY Rural Telephone Coop.
P.O. Box 649
237 North 8th Street
Mayfield, KY 42066**

**Mr. Fred Terry
Highland Telephone Cooperative
P. O. Box 119
7840 Morgan County Hwy.
Sunbright, TN 37872**

**Mrs. Louise Brown
Loretto Communications Services, Inc.
P.O. Box 130
136 S. Main Street
Loretto, TN 38469**

**Mr. Tom Rowland
North Central Communications, Inc.
P.O. Box 70
Hwy 52 By-Pass
Lafayette, TN 37083**

**FIRST
AMENDED AND RESTATED
ARTICLES OF ORGANIZATION
OF
TENNESSEE INDEPENDENT TELECOMMUNICATIONS GROUP, LLC**

RECEIVED

01 OCT 17 AM 11:25

Pursuant to the provisions of the Tennessee Limited Liability Company Act, the Articles of Organization of Tennessee Independent Telecommunications Group, LLC, as filed with the Secretary of State of Tennessee on November 25, 1998, are hereby amended and restated as follows:

Name

The name of the limited liability company is Tennessee Independent Telecommunications Group, LLC (the "Company").

Registered Office and Agent

The name and address of the registered agent is Ellen Bryson at 2525 West End Avenue, 4th Floor, Nashville, Davidson County, Tennessee 37203.

Organizer

Mark Patterson, whose address is 950 Main Street, Suite D, Wartburg, Morgan County, Tennessee 37887 is the organizer of the LLC.

Number of Members

At the date of the filing of the Articles, there are eleven (11) members.

Date of Formation

The existence of the Company began upon the filing of the original Articles of Organization on November 25, 1998.

Management

The Company shall be board-managed. The business of the Company shall be conducted under the management of its board in accordance with the operating agreement and the Act. Each governor shall have one (1) vote for each Unit beneficially held by the member that appointed such governor.

Principal Executive Office

The Principal Executive Office of the Company is 2525 West End Avenue, 4th Floor, Nashville, Davidson County, Tennessee 37203.

Transfer of Membership Interest

No member may transfer or assign his membership interest or any part thereof to any person except as provided in the operating agreement. No holder may transfer or assign his financial rights to any person except as provided in the operating agreement. The consent to transfer may be by board and/or member action as provided in the operating agreement. In absence of a provision in the operating agreement, the default rules of the Act shall apply.

Dissolution Events

The events or actions that constitute a dissolution may be by board and/or member action as provided in the operating agreement. In absence of a provision in the operating agreement, the dissolution events shall be (i) a majority vote of the members to dissolve or (ii) the having of less than one member.

Preemptive Rights and Right of First Refusal

Members and parties to a contribution agreement may have preemptive rights if so provided in the operating agreement. The members and/or the Company and/or a specific member may have rights of first refusal if they are set forth in the operating agreement.

Action on Recommendation

If the operating agreement so provides, action on recommendation as permitted in T.C.A. §48-223-103 shall be allowed.

1999 LLC Amendments

In accordance with the amendment to Tenn. Ann. Code Section 48-245-101(a) as set forth in House Bill No. 1807 ("H.B. 1807") of the 101st General Assembly of the State of Tennessee, the Company elects into the revised limited liability company dissolution provisions. In addition, the Company elects to have the remaining provisions of H.B. 1807 as well as the provisions of House Bill 1872 and House Bill 992 apply to it, except to the extent such provisions are modified by the written operating agreement.

Expulsion

If the operating agreement so provides, a member may be expelled as provided therein.

1. The amendment was duly adopted on Oct. 15, 2001, by at least a majority of the members of the Company.
2. The amendment was duly adopted on Oct. 15, 2001, by at least a majority of the governors of the Company.
3. The amendment is to be effective upon filing with the Tennessee Secretary of State.

Agreed to this the 15th day of October, 2001.

**TENNESSEE INDEPENDENT
TELECOMMUNICATIONS
GROUP, LLC**

By: Ellen Bryson
Its: Chief Manager

EXHIBIT C

**Organizational Chart of Ownership Structure
and Information Regarding Board of Governors**

See attached.

BOARD OF GOVERNORS - 2016
Tennessee Independent Telecommunications Group, LLC dba IRIS Networks

Exhibit C

Ms. Lisa Cope
lkc@blomand.net

Ben Lomand Rural Telephone Coop.
P.O. Box 670 (Zip Code 37111)
311 North Chancery Street
McMinnville, TN 37110
931-473-2517 (v)
931-668-6646 (f)
Admin. - Sherri McGinnis
smcginnis@blomand.net
931-668-6605

Mr. A J Passarella
aj2k@lorettotel.com

Loretto Communications Services, Inc.
P. O. Box 130
136 S. Main Street
Loretto, TN 38469
931-853-4351 (v)
931-853-4329 (f)
Admin. - Carolyn Thompson
carolyn@lorettotel.com

Chairman

Mr. Jonathan L West

jwest@twlakes.coop
Twin Lakes Telephone Cooperative
P.O. Box 67
201 Gore Avenue
Gainesboro, TN 38562-0067
931-268-2151 (v)
931-268-2734 (f)
Admin. - Ellen Forkum
bef@twlakes.coop

Mr. Charles Boring

cboring@bledsoe.net
Bledsoe Telephone Cooperative
P.O. Box 609
203 Cumberland Ave.
Pikesville, TN 37367
423-447-2121 (v)
423-447-6853 (f)
Admin. - Roberta Smith
smithr@bledsoe.net
423-447-2121

Ms. Nancy White

njwhite@nctc.com
North Central Communications, Inc.
872 Highway 52 By Pass E
P.O. Box 70
Lafayette, TN 37083
615-666-2151 (v)
615-666-6772 (f)
Admin. Lisa Perrigo
lisa.perrigo@nctc.com
615-688-6418

Chairman Pro Tem

Mr. William Bradford

wbradford@united.net
United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034
931-364-2289 (v)
931-364-7202 (f)
Admin. - Cindy Autry
cautry@utcoffice.net
931-364-4322

Chris Townson's

ctownson@dtccom.net
DTC Communications
P.O. Box 427
111 High Street
Alexandria, TN 37012
615-464-2201 (v)
615-529-1500 (f) 2955 (main)
Admin. - Anita Patrick
anitap@dtccom.net
615-464-2271

Mr. William J. (Bill) Franklin

billfranklin@sctc.org
Scott County Telephone Coop.
P.O. Box 487
121 Woodland Street
Gate City, VA 24251
276-452-9119 (v)
276-452-2447 (f)
Admin. - Melissa Jessee
mjessee@sctc.org
276-452-7365

Mr. Trevor R. Bonnsetter

tbonn@wk.net
Trevor's Direct Fax: 270-856-3651
West KY & TN Rural Telephone Coop.
P.O. Box 649
237 North 8th Street
Mayfield, KY 42066
270-247-4350 (v) 270-856-3651 (f)
Admin. - Davida Bridges
dbridges@wk.net
270-674-1000

Secretary

Mr. Mark Patterson

pattersonm@highland.net
Highland Telephone Cooperative
P.O. Box 119
780 Morgan County Hwy.
Sunbright, TN 37872
423-628-2121 (v)
423-628-2409 (f)
Admin. - Sandra Harness
Sandra@highlandtel.net

EXHIBIT D

Officers

See attached.

Principal Company Officers

Terry Metze Jr. President

Terry Metze has over 30 years of experience leading telecommunication service providers and enabling rural broadband partnerships. Over the course of his career, he has founded and chaired several regional boards to promote broadband access in remote areas of the Southeast. A transitional turn-around specialist, Terry specializes in creating value for all stakeholders in an organization.

Terry graduated from the University of South Carolina, Magna Cum Laude with a degree in Electrical Engineering. He also holds an MBA in International Business from the prestigious Darla Moore School of Business.

Dave Redys

CTO Dave's Redys 25+ years of experience leading network engineering and technology teams within both carrier and enterprise organizations. David has an Electrical Engineering Degree from University of GA Tech.

This position is to provide the required technical expertise to oversee all aspects of the technological portion of the Company. Management of the engineering, design, implementation, operation, and maintenance of the broadband network. A critical member of the team, the Chief Technology Officer is responsible for ensuring best in class practices across the network organization.

EXHIBIT E

PROPRIETARY AND CONFIDENTIAL UNDER SEAL

Audited Financial Statements

See attached.

EXHIBIT F

Technical Staff

See attached.

Technical Staff, biography & Job Descriptions

Dave Redys

CTO Dave's Redys 25+ years of experience leading network engineering and technology teams within both carrier and enterprise organizations. David has an Electrical Engineering Degree from University of GA Tech.

This position is to provide the required technical expertise to oversee all aspects of the technological portion of the Company. Management of the engineering, design, implementation, operation, and maintenance of the broadband network. A critical member of the team, the Chief Technology Officer is responsible for ensuring best in class practices across the network organization.

Kris Schachtschneider –

Director of Client Services Kris has 22 years of telecommunication experience and graduated with Bachelor degree of Electrical Engineering from ITT Tech.

This position Manages customer accounts and works customer issues until they are resolved.

Chris Harris-

Director of Operation/Engineering-Chris has over 20 year's telecommunication experience working multiple vendor networks.

This position manages the day to day Operations and Engineering Departments and provides technical support for customer services issues.

Ian Hutchinson –

System Engineer Ian has over 20 years' experience in IT base services with a Master of Science in management in information systems security.

This position manages and maintains the security and integrity of iRis Networks platform.

Justin Harlow –

Sr. System Engineer Justin has over 13 year's telecommunication engineering experience. Justin holds an associate degree in multiple technology sciences.

This position oversees the design and implementation of new deployments and upgrades of services.

In addition to the iRis Senior Technical staff, iRis Networks employees have a pool of other technical resources within the ownership across the State of Tennessee. In times of dispatch to customer responses of trouble and technical expertise needed, these resources can be used in an efficient time saving manor to give a value add to our customer base.

EXHIBIT G

Certificate of Service

See attached.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the 9th day of March, 2017.

Ardmore Telephone Company, Inc.
P.O. Box 547
517 Ardmore Avenue
Ardmore, TN 38449

AT&T
333 Commerce Street
Nashville, TN 37201-3300

Century Telephone of Adamsville
P.O. Box 405
116 N. Oak Street
Adamsville, TN 38310

Century Telephone of Claiborne
P.O. Box 100
507 Main Street
New Tazewell, TN 37825

Century Telephone of Ooltewah-Collegedale,
Inc.
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363

Citizens Communications Company of Tennessee
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

Citizens Communications Company of the
Volunteer State
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

Loretto Telephone Company, Inc.
P.O. Box 130
Loretto, TN 38469

Millington Telephone Company, Inc.
4880 Navy Road
Millington, TN 38053

Sprint-United
112 Sixth Street
Bristol, TN 37620

TDS Telecom-Concord Telephone Exchange,
Inc.
P.O. Box 22610
701 Concord Road
Knoxville, TN 37933-0610

TDS Telecom-Humphreys County Telephone
Company
P.O. Box 552
203 Long Street
New Johnsonville, TN 37134-0552

TDS Telecom-Tellico Telephone Company, Inc.
P.O. Box 9
102 Spence Street
Tellico Plains, TN 37385-0009

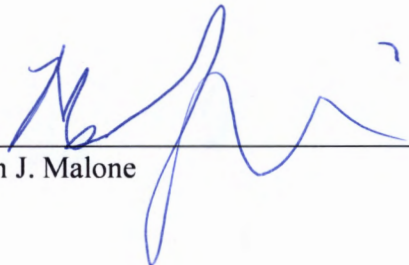
TDS Telecom-Tennessee Telephone Company
P.O. Box 22995
Knoxville, TN 37933-0995

TEC-Crockett Telephone Company, Inc.
P.O. Box 7
Friendship, TN 38034

TEC-People's Telephone Company, Inc.
P.O. Box 310
Enn, TN 37061

TEC-West Tennessee Telephone Company, Inc.
P.O. Box 10
244 E. Main Street
Bradford, TN 38316

United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034



Melvin J. Malone

EXHIBIT H

Small and Minority-Owned Telecommunications Business Participation Plan

See attached.

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-112, as amended, Tennessee Independent Telecommunications Group, LLC d/b/a iRis Networks ("iRis") submits this small and minority-owned Telecommunications business participation plan (the "Plan").

I. PURPOSE

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. iRis 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. iRis 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, iRis will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to iRis of such opportunities. iRis' representatives have already contacted the Department of Economic and Community Development and the administrator of the Small and Minority-Owned Telecommunications Assistance Program, to obtain a list of qualified vendors. Moreover, iRis will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in §65-5-112.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or 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).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

iRis' Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting iRis' full efforts to provide equal opportunities for small and minority-owned businesses. The Administrators of the Plan will be:

Sheryl Kilgore and Debra Gray
iRis Networks
211 Commerce Street, Suite 610
Nashville, TN 37201
Telephone: (615) 425-2304
Facsimile: (615) 986-2092

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (3) Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperating with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned

businesses to locate and use qualified small and minority-owned businesses as defined in §65-5-112.

- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperating in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.
- (8) Providing information and educational activities to persons within iRis and training such persons to seek out, encourage, and promote the use of small 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 and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and

feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

iRis will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, iRis will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan. iRis will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, iRis will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Tennessee Independent Telecommunications
Group, LLC d/b/a iRis Networks

By:  and 
Administrators

Dated: April 27, 2016.

EXHIBIT I

Pre-Filed Testimony

See attached.

STATE OF TENNESSEE
BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE:)	
)	
)	
APPLICATION OF TENNESSEE)	
INDEPENDENT TELECOMMUNICATIONS)	Docket No.
GROUP, LLC D/B/A IRIS NETWORKS FOR)	
A CERTIFICATE OF CONVENIENCE AND)	
NECESSITY TO OPERATE STATEWIDE)	
AS A COMPETITIVE CARRIER)	
PROVIDING A FULL ARRAY OF)	
INTRASTATE TELECOMMUNICATIONS)	
SERVICES)	

PRE-FILED TESTIMONY OF

TENNESSEE INDEPENDENT TELECOMMUNICATIONS

GROUP, LLC D/B/A IRIS NETWORKS

March 9, 2017

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Terry Metze, and my business address is Tennessee Independent
3 Telecommunications Group, LLC d/b/a Iris Networks, 211Commerce Street, Suite 610,
4 Nashville, TN 37201.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am the President of Tennessee Independent Telecommunications Group, LLC
7 d/b/a Iris Networks ("IRIS" or "Applicant").

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS**
9 **EXPERIENCE.**

10 A. I have been involved in the telecommunications industry for over 30 years. I am
11 currently employed as the President of IRIS. Over the course of my career, I have
12 founded and chaired several regional boards to promote broadband access in remote areas
13 of the Southeast. A telecommunications transitional turn-around specialist, I specialize
14 in creating value for rural telecom networks. I graduated from the University of South
15 Carolina in Columbia, South Carolina, magna cum laude with a degree in Electrical
16 Engineering in 1991. I also hold a master of business administration from the Darla
17 Moore School of Business. I am a Marine Corps veteran.

18 **Q. FOR WHOM ARE YOU TESTIFYING IN THIS PROCEEDING?**

19 A. I am testifying on behalf of IRIS.

20 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

21 A. The purpose of my testimony is to support the *Application of Tennessee*
22 *Independent Telecommunications Group, LLC d/b/a Iris Networks for An Expanded*

Certificate of Public Convenience and Necessity to Operate Statewide as a Competitive Local Exchange Carrier (the “Application”).

Q. PLEASE DESCRIBE THE CORPORATE STRUCTURE OF IRIS.

A. IRIS is a Tennessee limited liability company, with the following members (owners): Ben Lomand Rural Telephone Cooperative, Inc., Bledsoe Telephone Cooperative, DTC Communications, Highland Telephone Cooperative, Loretto Communications Services, Inc., North Central Communications, Inc., Scott County Telephone Cooperative, Twin Lakes Telephone Cooperative, United Telephone Company and West Kentucky Rural Telephone Cooperative. An organizational chart of the corporate structure of IRIS is provided in Exhibit A to the *Application* and an organizational chart of the ownership structure of IRIS, as well as the names and addresses of the governors of IRIS, is provided in Exhibit C to the *Application*.

IRIS is currently authorized to provide transport services and competitive access services in the State of Tennessee, and, through contractual relationships with others, it provides transport services in North Carolina, Kentucky, West Virginia, Virginia, Maryland, Pennsylvania, Ohio, Indiana, Alabama, Georgia, South Carolina, and Florida. A copy of IRIS’s articles of organization is attached as Exhibit B to the *Application*.

Q. PLEASE DESCRIBE IRIS’S OPERATIONS IN THE STATE OF TENNESSEE.

A. In its May 2004 *Order Approving Application For Certificate of Public Convenience and Necessity* in TRA Docket Number 03-00581 (the “2004 Order”), the Tennessee Regulatory Authority (“Authority” or “TRA”) found that IRIS had sufficient managerial, technical and financial support to warrant certification to provide competitive access services and transport telecommunications services within the State of Tennessee

and approved of a franchise agreement with the City of Knoxville.¹ The Authority also found that IRIS had complied with all applicable Authority rules and regulations relevant to its application. IRIS currently provides transport services and competitive access services in over twenty-five counties in the State of Tennessee, including Tennessee's major metropolitan markets and deep into many rural areas. Through contractual relationships with others, IRIS provides transport services in North Carolina, Kentucky, West Virginia, Virginia, Maryland, Pennsylvania, Ohio, Indiana, Alabama, Georgia, South Carolina and Florida. Presently, IRIS is a carriers' carrier that provides long haul transport to other carriers and also provides competitive access to carriers on behalf of incumbent local exchange ("ILECs") through a tandem switch.

Q. DOES IRIS HOLD ANY LICENSES OR GRANTS OF AUTHORITY IN ANY STATES OTHER THAN TENNESSEE?

A. Yes. IRIS has licensed authority to operate in Alabama, Kentucky, Virginia and Georgia.

Q. WHAT IS IRIS SEEKING IN ITS APPLICATION IN THIS DOCKET?

A. IRIS is currently seeking to modify its existing Certificate of Public Convenience and Necessity ("CCN") for authority to provide intrastate telecommunications services statewide as a Competitive Local Exchange Carrier ("CLEC"). IRIS is applying to expand its CCN for the ability to provide expanded intrastate telecommunications services, including wireless Internet services and voice over Internet protocol ("VoIP") directly to business and enterprise customers. IRIS is aware of all the requirements necessary in order to expand its offerings statewide. At this time, IRIS intends to provide

¹ See 2004 Order.

68 end user services to medium-sized business and enterprise customers. Although IRIS
69 may provide end user services to multi-tenant, small business and residential customers
70 sometime in the future, IRIS has no present plans to provide end user services to multi-
71 tenant, small business or residential customers. To the extent that any rural incumbent
72 local exchange carrier possesses an exemption or suspension under Section 251(f) of the
73 Federal Communications Act (the "Act") that applies to IRIS, IRIS does not seek
74 interconnection under Section 251(c) at this time, nor does IRIS seek at this time to
75 challenge any such exemption from any of the other obligations specified in Section
76 251(c) of the Act.

77 For CLEC services, IRIS plans to use leased or facility-based Ethernet and fiber-
78 based access to provide IP services and utilize other carriers' VoIP platforms for voice
79 services until such time as IRIS determines to provide VoIP services directly on its
80 switching platform. IRIS will offer directory services and E911.

81
82 **Q. WHY IS IRIS SEEKING EXPANDED AUTHORITY?**

83 **A.** IRIS desires to expand its offerings of telecommunications services throughout
84 the State of Tennessee in order to provide more consumers with increased carrier choices,
85 competitive pricing, increased reliability, responsiveness, and innovation. The granting
86 of this *Application* will provide significant benefits to Tennessee consumers and thereby
87 serve the public interest.

88 **Q. DOES IRIS MEET THE STATUTORY REQUIREMENTS SET FORTH IN**
89 **TENN. CODE ANN. § 65-4-201(c)?**

90 **A.** Yes. Before issuing the *2004 Order*, the Authority reviewed and evaluated IRIS's
91 managerial, financial and technical abilities. Since that time, IRIS has gained valuable

92 experience as a telecommunications provider. This experience provides IRIS with the
93 foundation necessary to provide the proposed telecommunications services and to further
94 serve Tennessee's telecommunications consumers. IRIS is managerially qualified to
95 provide telecommunications services statewide. Attached as **Exhibit D** to the
96 *Application* is a list of the names of the Applicant's principal company officers and a
97 description of brief description of each officer's background and experience. As shown
98 in this exhibit, these officers of the company have substantial managerial experience in
99 the areas of utility operations, utility customer service and utility marketing.

100 IRIS is financially qualified to provide the proposed telecommunications services
101 statewide. As a provider of telecommunications services in Tennessee, IRIS has been
102 profitable since shortly after its inception in 1998. Attached as **PROPRIETARY AND**
103 **CONFIDENTIAL UNDER SEAL Exhibit E** to the *Application* is IRIS's 2015 and
104 2016 Audited Financial Statements, which confirm that IRIS is financially sound and has
105 adequate resources to provide expanded intrastate telecommunications services statewide.

106 Before issuing the *2004 Order*, the Authority reviewed and evaluated IRIS's
107 technical abilities. The TRA granted the requested authority in 2004 based, in part, upon
108 finding that IRIS possessed the requisite technical qualifications to provide
109 telecommunications services in Tennessee. Since that time, IRIS has gained valuable
110 telecommunications experience and successfully serviced its telecommunications
111 customers. Again, information concerning the technical expertise of IRIS's senior
112 management team is included in **Exhibit D** to the *Application*. A list of IRIS's key
113 technical staff, along with a brief biography and job description, are set forth in **Exhibit**
114 **F** to the *Application*. This experience provides IRIS with the foundation necessary to

115 provide the proposed telecommunications services and to serve Tennessee's
116 telecommunications consumers. Hence, IRIS is technically qualified to offer local
117 exchange services.

118 **Q. WILL IRIS CONTINUE TO COMPLY WITH THE TRA'S POLICIES, RULES,**
119 **AND ORDERS?**

120 A. Yes. And, subsequent to the approval of its *Application*, IRIS will file any
121 necessary tariff revisions prior to expanding its service offerings beyond those already
122 permitted under its existing CCN. Further, a certificate of service stating that notice of
123 this *Application* has been served on all eighteen (18) incumbent local exchange telephone
124 companies in Tennessee is attached as **Exhibit G** to the *Application*.

125 IRIS's Small and Minority-Owned Telecommunications Business Participation
126 Plan is provided as **Exhibit H** of the *Application*.

127 **Q. WILL IRIS COMPLY WITH STATE LAW IN RELATION TO ITS REQUEST**
128 **FOR EXPANDED AUTHORITY?**

129 A. Yes.

130 **Q. WILL THE GRANTING OF THE APPLICATION SERVE THE PUBLIC**
131 **INTEREST?**

132 A. Yes. The Authority issued the 2004 *Order* based, in part, upon finding that
133 granting the same was in the public interest. Since that time, IRIS has developed and
134 matured as a seasoned telecommunications provider. The granting of the *Application*
135 will further the public interest by expanding the availability of telecommunications
136 services, consistent with state law. Specifically, Tennessee consumers will continue to
137 benefit directly through the use of the competitive wholesale services offered by IRIS.

138 Further, the public will benefit through the continued and expanded competitive presence
139 of IRIS, which will increase the incentives for telecommunications providers to operate
140 more efficiently, offer more innovative services, reduce prices, and improve the quality
141 and coverage of their services. The granting of the *Application* would be consistent with
142 the public policy of the State of Tennessee, as set forth at Tenn. Code Ann. § 65-4-123,
143 “to foster the development of an efficient, technologically advanced statewide system of
144 telecommunications services by permitting competition in all telecommunications
145 services market[.]”

146 **Q. IS THE *APPLICATION* TRUE AND CORRECT TO THE BEST OF YOUR**
147 **KNOWLEDGE, INFORMATION AND BELIEF?**

148 **A.** Yes.

149 **Q. DOES THIS CONCLUDE YOUR PRE-FILED TESTIMONY?**

150 **A.** Yes, it does. Thank you.