

BUTLER | SNOW

October 4, 2017

VIA HAND DELIVERY

17-00112

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

RE: In Re: Application of Ardmore Telephone Company Incorporated for a Certificate of Convenience and Necessity to Provide Intrastate Telecommunication Services Statewide, TPUC Docket No. _____

Dear Chairman Jones:

Enclosed please find one (1) original and thirteen (13) copies of the *Application of Ardmore Telephone Company Incorporated for a Certificate of Convenience and Necessity to Provide Intrastate Telecommunication Services Statewide* (the "Application"). Also enclosed is a check in the amount of \$25.00 for the required filing fee. Please note that Exhibit B to the Application is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of Exhibit B 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*

MELVIN J. MALONE
615.651.6705
melvinmalone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

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BUTLER SNOW LLP

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

**APPLICATION OF ARDMORE)
TELEPHONE COMPANY)
INCORPORATED FOR A)
CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO)
PROVIDE INTRASTATE)
TELECOMMUNICATIONS SERVICES)
STATEWIDE)**

DOCKET NO.

17-00112

**APPLICATION OF ARDMORE TELEPHONE COMPANY INCORPORATED
FOR A CERTIFICATE OF
PUBLIC CONVENIENCE AND NECESSITY
TO PROVIDE INTRASTATE TELECOMMUNICATIONS SERVICES STATEWIDE**

Ardmore Telephone Company Incorporated (“Ardmore” 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 Public Utility Commission (“TPUC” or “Commission”), as applicable, hereby submits this *Application of Ardmore for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunications Services Statewide* (the “Application”).

Ardmore is a telecommunications company that was incorporated in Tennessee in 1955 and has its principal office in Ardmore, Alabama. Ardmore currently provides a full array of telecommunications and broadband services in Limestone and Madison Counties in Alabama and Giles and Lincoln Counties in Tennessee, servicing approximately 6,500 customers collectively. Ardmore currently offers broadband, telephone, sling television, and security services throughout its existing service area.

In this ever-changing, dynamic and technologically advancing environment, Ardmore seeks to provide a full array of telecommunications services on a statewide basis as business conditions warrant. As set forth herein, and as demonstrated by Ardmore's longstanding experience as a telecommunications provider, Ardmore has the managerial, financial, and technical fitness to provide the applied-for services in the State of Tennessee. As highlighted 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, Ardmore requests expedited consideration and approval of this *Application*.

In support of the *Application*, Ardmore submits the following.

I. DESCRIPTION OF THE APPLICANT

1. Legal Name and Address of Applicant: Applicant's legal name is Ardmore Telephone Company Incorporated. Ardmore maintains its principal place of business at:

Ardmore Telephone Company Incorporated
P.O. Box 549
30190 Ardmore Avenue
Ardmore, Alabama 35739

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

Melvin J. Malone (BPR No. 13874)
Butler Snow LLP
150 Third Avenue South Suite 1600
Nashville, TN 37201
Telephone: (615) 651-6705
melvin.malone@butlersnow.com

Caroline L. Eley (BPR No. 31109)
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 Ardmore should be directed to:

Trevor Bonnstetter, Chief Executive Officer
Ardmore Telephone Company Incorporated
P.O. Box 549
30190 Ardmore Avenue
Ardmore, Alabama 35739
Telephone: (270) 856-9980
tbonn@tmsvcs.com

4. Corporate Information: As set forth and established by the Applicant, Ardmore was formed in 1955 and is authorized to provide telephone service. Ardmore's charter is attached hereto in Exhibit C. The biographies of the principal corporate officers, members of the Board of Directors, and staff of Ardmore are attached hereto in Exhibit A. Since 2009, Ardmore is a wholly-owned subsidiary of Synergy Technology Partners, Inc. Synergy Technology Partners, Inc. is a wholly-owned subsidiary of West Kentucky and Tennessee Telecommunications Cooperative Corporation.

II. QUALIFICATIONS

Since 1955, Ardmore has gained valuable experience as a telecommunications provider. With this significant experience, and as demonstrated below, Ardmore continues to possess the requisite managerial, technical, and financial ability to provide local telecommunications service throughout the State of Tennessee.

1. Managerial: Ardmore has been providing telephone services in Tennessee since 1955, primarily to Tennesseans in Giles and Lincoln Counties. As a telecommunications provider since 1955, Ardmore is a seasoned, well-established telecommunications provider. Hence, Ardmore has the foundation necessary to provide the proposed telecommunications services and to serve Tennessee's telecommunications consumers throughout the state.

Ardmore remains managerially qualified to provide telecommunications services statewide. Ardmore is led by Trevor Bonnstetter, Chief Executive Officer, and he is supported by highly qualified and competent board members, officers and staff. Attached hereto as **Exhibit A** is a list of the names of the Applicant's principal company officers and a description of each officer's background and experience. As shown in **Exhibit A**, these officers of the company have substantial managerial experience, including in the areas of utility operations, utility customer service and utility marketing.

2. **Financial Qualifications:** As evidenced by its longstanding service history, Ardmore is financially qualified to provide a full array of telecommunications services statewide. Ardmore submits as **CONFIDENTIAL Exhibit B** Synergy Technology Partners, Inc.'s Independent Auditor's Reports and Consolidated Financial Statements with Supplementary Information for December 31, 2016 and 2015, which demonstrates that Ardmore is financially qualified to provide telecommunications services statewide. **CONFIDENTIAL Exhibit B** is being submitted **UNDER SEAL** as **CONFIDENTIAL AND PROPRIETARY**.

Ardmore's financials do not reflect any material revenues or expenses associated with reciprocal compensation.

3. **Technical Qualifications:** Based on its experience since 1955 as a telecommunications services provider, coupled with its demonstrated managerial experience, Ardmore possesses the necessary technical qualifications to provide a full array of telecommunications services throughout Tennessee. Information concerning the technical expertise of Ardmore's senior management team is included in **Exhibit A**. This experience provides Ardmore with the foundation necessary to provide the proposed telecommunications services. Ardmore will file and maintain tariffs in the manner prescribed by the Commission and

will meet minimum basic local standards, including quality of service and billing standards required of all providers regulated by the Commission. Ardmore possesses the requisite level of telecommunications expertise and is technically qualified to offer the proposed services.

III. PROPOSED SERVICES

1. In addition to its current offerings, Ardmore intends to offer a full range of telecommunications services, including, but not limited to, dedicated and switched access services, private line services, local dial tone, 911 and E911 emergency services, enhanced services and all other Commission-required Rule 1220-4-8-.04(3)(b) services. To the extent appropriate and necessary, Ardmore may supplement its services by leasing the facilities of third party carriers and/or by reselling the services.

2. Ardmore provides telecommunications services in select areas in Tennessee, primarily Giles and Lincoln Counties, and it desires to expand upon such services, as business conditions warrant, to offer more consumers increased carrier choices, competitive pricing, increased reliability, responsiveness, and innovation.

3. Ardmore understands the importance of effective customer service for local service customers. Upon obtaining the requested expanded certification, Ardmore will continue to maintain its existing toll free customer service number, which is printed on the customers' monthly billing statements. Additionally, customers may write to Ardmore at its main office address in P.O. Box 549, 30190 Ardmore Avenue, Ardmore, Alabama 35739 or contact it by email at customerservice@ardmore.net. In the past year, Ardmore has had no formal customer service complaints filed.

4. To the extent that any rural incumbent LEC possesses an exemption or suspension under Section 251(f) of the Federal Communications Act (the "Act") that applies to Ardmore,

Ardmore does not seek interconnection under Section 251(c) at this time, nor does Ardmore seek at this time to challenge any such exemption from any of the other obligations specified in Section 251(c) of the Act.

IV. REGULATORY MATTERS

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

2. The Applicant's Small and Minority Owned Business Plan is attached as **Exhibit D.**

3. Ardmore has provided pre-filed sworn testimony in support of its Application in **Exhibit E.**

4. Subsequent to the approval of its *Application*, Ardmore will file any necessary tariffs prior to providing the proposed service covered by this *Application*.

5. A certificate of service stating that notice of this *Application* has been served on all seventeen (17) incumbent local exchange telephone companies in Tennessee is attached hereto.

6. Ardmore is aware of its obligation to comply with the requirements of county-wide calling, as set forth in Tenn. Code Ann. § 65-21-114.

7. Ardmore does not currently collect deposits from first time customers. To the extent that Ardmore requires a deposit for the establishment of service, the same shall be implemented in compliance with the Commission's rules and regulations and as properly provided in and consistent with tariffs.

V. PUBLIC INTEREST STATEMENT

1. Ardmore is a seasoned telecommunications provider, and the Federal Communications Commission (“FCC”) has determined that Tenn. Code. Ann. § 65-4-201(d) is preempted by federal law.¹ Moreover, due to said preemption, the Attorney General for the State of Tennessee has issued an opinion that § 65-4-201(d) is not enforceable.²

2. The grant of this *Application* will further the public interest by expanding the availability of telecommunications services throughout the State of Tennessee. Specifically, Tennessee consumers will benefit directly through the use of the competitive local services to be offered by Ardmore. Ardmore will provide more choices for consumers. Further, the public will benefit indirectly because the competitive presence of Ardmore will increase the incentives for telecommunications providers to operate more efficiently, offer more innovative services, reduce prices, improve the quality and coverage of their services, and increase investment in broadband infrastructure.

3. 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[.]”

VI. CONCLUSION

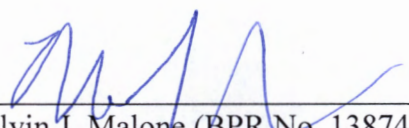
For the foregoing reasons, Ardmore Telephone Company Incorporated respectfully requests the Commission to grant its Certificate of Public Convenience and Necessity on an

¹ See *In the Matter of AVR, L.P. d/b/a Hyperion of Tennessee, L.P. Petition for Preemption of Tennessee Code Annotated § 65-4-201(d) and Tennessee Regulatory Authority Decision Denying Hyperion's Application Requesting Authority to Provide Service in Tennessee Rural LEC Areas*, Memorandum Opinion and Order, FCC 99-100, 14 F.C.C.R. 11,064 (rel. May 27, 1999), *aff'd* 16 F.C.C.R. 1247 (Jan. 8, 2001).

² See Office of the Attorney General, Opinion No. 01-036, 2001 Tenn. AG Lexis 36 (Mar. 19, 2001).

expedited basis and authorize it to provide telecommunications services, as requested herein, throughout the State of Tennessee.

Respectfully submitted,



Melvin J. Malone (BPR No. 13874)
Butler Snow LLP
150 Third Ave. South Suite 1600
Nashville, Tennessee 37201
(615) 251-6705 telephone
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

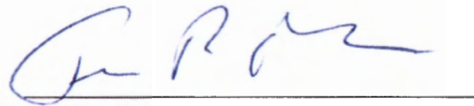
Attorneys for:

Ardmore Telephone Company Incorporated

VERIFICATION

STATE OF KY)
COUNTY OF Grainger)

I, Trevor R. Bonnstetter, being first duly sworn, make oath that I am the Chief Executive Officer of Ardmore Telephone Company Incorporated ("Ardmore"), that I am authorized to make this oath on behalf of Ardmore and that the *Application of Ardmore Telephone Company Incorporated for a Certificate of Convenience and Necessity to Provide Intrastate Telecommunications Services Statewide* submitted to the Tennessee Public Utility Commission, and the statements contained therein, including my Pre-filed Testimony, are true, accurate and correct to the best of my knowledge, information and belief.



Trevor Bonnstetter
Chief Executive Officer
Ardmore Telephone Company Incorporated

Sworn to and subscribed before me this 29 day of September, 2017.



Notary Public

My Commission Expires: 04-14-18
#506681

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 4th day of October 2017.

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

Ben Lomand Connect
P.O. Box 670
311 North Chancery Street
McMinnville, TN 37111

Bledsoe Telephone Cooperative
P.O. Box 609
338 Cumberland Avenue
Pikeville, TN 37367

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

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

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

Concord Telephone Exchange, Inc.
10025 Investment Drive, Suite 200
Knoxville, TN 37932

DTC Communications
P.O. Box 247
111 High Street
Alexandria, TN 37012-0247

Highland Telephone Cooperative, Inc.
P.O. Box 119
7840 Morgan County Hwy.
Sunbright, TN 37872-0119

Humphreys County Telephone Company
10025 Investment Drive, Suite 200
Knoxville, TN 37932

Loretto Telecom
136 S Main Street
Loretto, TN 38469

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

North Central Telephone Cooperative, Inc.
P.O. Box 70
872 Highway 52 By-pass East
Lafayette, TN 37083

Ritter Communications
4880 Navy Road
Millington, TN 38053

Scott County Telephone Cooperative
P.O. Box 487
Gate City, VA 24251-0487

SkyLine Membership Corporation
P.O. Box 759
West Jefferson, NC 28694-0759

TDS Telecom
10025 Investment Drive, Suite 200
Knoxville, TN 37932-0995

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/Bradford
224 East Main Street
P.O. Box 10
Bradford, TN 38316

TEC/Erin
P.O. Box 310
4587 West Main Street
Erin, TN 37061

TEC/Friendship Division
563 Main Street
P.O. Box 7
Friendship, TN 38034

Tellico Telephone Company
10025 Investment Drive, Suite 200
Knoxville, TN 37932

Tennessee Telephone Company
10025 Investment Drive, Suite 200
Knoxville, TN 37932

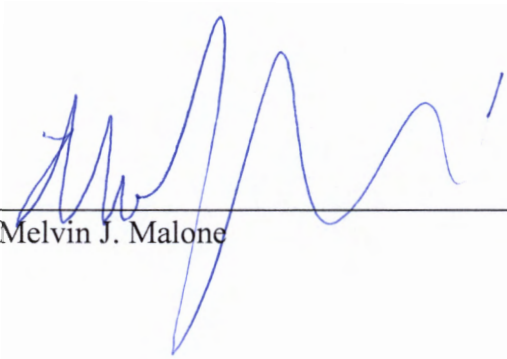
Twin Lakes Telephone Cooperative Corporation
P.O. Box 67
200 Telephone Lane
Gainesboro, TN 38562-0067

United Communications
120 Taylor Street
Box 38
Chapel Hill, TN 37034

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

United Telephone – Southeast
112 6th Street
Bristol, TN 37620-2267

West Kentucky and Tennessee
Telecommunications Cooperative
P.O. Box 649
237 North 8th Street
Mayfield, KY 42066



Melvin J. Malone

EXHIBIT A

SUMMARY BIOGRAPHIES OF OFFICERS, BOARD MEMBERS, AND STAFF

Ardmore Telephone Company, Inc.

Chief Executive Officer

Trevor R. Bonnstetter

Work Location: 237 North 8th Street, Mayfield, KY 42066

Experience

February 1998 – Present

Ardmore Telephone Company and West Kentucky and Tennessee
Telecommunications Cooperative

Manages the cooperative's businesses which includes telephone, long distance, technology store, broadband, digital television, security systems and technology park.

Education

Walden University – Minneapolis, MI: PhD, 2011

William Woods University, Fulton, MO: Master of Business Administration
Graduated Cum Laude; 2006

Mid Continent University, Mayfield, KY: Bachelor of Science in Organization
Leadership.
Graduated Cum Laude; 2001

Ardmore Telephone Company, Inc.
Officer Biography
(On Contract)

Karen Jackson-Furman
Chief Operating Officer/Chief Financial Officer

Work Location: 237 N. 8th Street, Mayfield, KY 42066

Experience

2016 – present

Ardmore Telephone Company and West Kentucky and Tennessee Telecommunications Cooperative

Responsible for all financial and customer operations business functions. Manage accounting staff responsible for internal financial statement preparation, corporate budgets, tax reporting, and regulatory reporting. Manage customer service staff responsible for billing, reporting, and customer facing processes. Work directly with corporate attorneys, industry consultants, and the board of directors.

1993 – 2015

Egyptian Telephone Cooperative and ComTech Solutions, LLC

Managed all day to day operations of the accounting function, including end user billing and carrier access billing. Prepared and presented the annual operating budget and five year capital budget. Created business plans and evaluated the profit potential of new products, markets, etc. Collected all data for cost study preparation and access rate development

Education

Southeast Missouri State University – Cape Girardeau, MO

Bachelor of Science in Business Administration, Accounting Emphasis, 1993

Southern Illinois University Edwardsville – Edwardsville, IL

Master of Business Administration, 1999

Professional Designation

Certified Public Accountant, 1996

Ardmore Telephone Company, Inc.
Officer Biography

Carrie Huckleby
Chief Marketing Officer

Work Location: 237 N. 8th Street, Mayfield, KY 42066

Experience

2010 – present

Ardmore Telephone Company and West Kentucky and Tennessee Telecommunications Cooperative

Manage day to day marketing, public relations, local channel, and sales teams for the cooperative and Ardmore. Prepare annual marketing budgets and provide final approval of the local channel and sales budgets. Prepare annual product projections and marketing plans. Duties include evaluating pricing and recommending new services based on customer wants and demands. Responsible for evaluating brand opportunities through public relation events and local channel development. Accountable for company messaging and customer education.

2004-2010

Competitive Services Manager, Ben Lomand Connect

Managed all day to day marketing, public relations, local channel, and outside sales teams for the parent company and CLEC operation. Prepared annual CLEC operational and cooperative marketing budgets. Prepared and monitored annual product projections. Responsible for evaluating branding opportunities through public relation events and local channel development. Responsible for company messaging and customer education.

Education

Motlow State Community College – Tullahoma, TN

Associate of Science, Business Administration and Management – 2009

Mid-Continent University – Mayfield, KY

Bachelor of Science, Business Administration and Management – 2012

Bethel University – McKenzie, TN

Master of Business Administration, 2016

Ardmore Telephone Company, Inc.

Board Member

Levoy Knowles

Joined the Board of Directors: 2016

Experience

January 2014 – Present

Tennessee Telecommunications Association (TTA) – Executive Director

Coordinate's the activities of the TTA

December 1981 – January 2011

Ben Lomand Telephone Cooperative – Chief Executive Officer

Responsible for the day-to-day oversight and management of the cooperative and its subsidiaries

Education

Tennessee Technological University
Bachelor's Degree, Business/Commerce

Ardmore Telephone Company, Inc.

Board Member

Anthony Goodman

Joined the Board of Directors: 2000

Experience

Vice President and Wood Procurement

Goodman Lumber Company – Family Owned Business

Ardmore Telephone Company, Inc.

Board Member

Jeff Davis

Joined the Board of Directors: 1988

Experience

Co-Owner and President

Davis Brothers Farms – Family Owned Business

Ardmore Telephone Company, Inc.
(On Contract)

Stacey Riley
Operations Manager

Work Location: 237 N. 8th Street, Mayfield, KY 42066

Experience

1993 – present

Ardmore Telephone Company and West Kentucky and Tennessee Telecommunications Cooperative

Responsible for day to day operations. Manage OSP, Central office and IT departments. Work directly with Engineering Companies, Vendors and Board of directors.

- Managed the yearly fiber builds and maintain a budget

- **Education**

Graves County High School

PUBLIC EXHIBIT B

**INDEPENDENT AUDITOR'S REPORTS AND CONSOLIDATED FINANCIAL
STATEMENTS WITH SUPPLEMENTARY INFORMATION**

EXHIBIT C

CHARTER

STATE OF TENNESSEE-CHARTER OF INCORPORATION

Be it known that F. C. Merrell, Thomas Ed Merrell, Dealie Fergurson Merrell, Marie Merrell Broadway, David E. Cheatham, are hereby constituted a body corporate, by the name of Ardmore Telephone Company Incorporated.

The situs and address of said corporation shall be Ardmore, Tennessee.

The authorized common capital stock shall be \$25,000.00, divided into shares, each of \$100.00. The authorized preferred capital stock shall be \$25,000.00, divided into shares each of \$100.00.

The amount of the capital stock with which the corporation will begin business, will be \$1,000.00, and when said amount shall have been subscribed for, all subscriptions shall be enforceable, and the corporation may begin business as though the maximum or authorized capital stock had been subscribed and paid; provided, that in all statements published the true amount of the paid-in capital stock shall be plainly stated.

The corporation shall have perpetual existence.

The general nature of the business to be transacted by the corporation shall be to construct, operate, and maintain a telephone exchange in the State of Tennessee, and in the State of Alabama, and to do any and everything incident, useful, or necessary for the establishment of, and the operation of a telephone system or exchange for the use, convenience, and accommodation of the citizens and residences of the area served, and the public generally, and to do everything that is incident, useful, or necessary in the operation of a telephone system that is not specifically forbidden by law.

The general powers of the corporation shall be:

- (1) To sue and be sued by the corporate name.
- (2) To have and use a common seal, which it may alter at pleasure;
if no common seal, then the signature of the name of the
corporation by any duly authorized officer shall be legal and
binding.
- (3) To purchase and hold or receive by gift, in addition to the
personal property, any real estate necessary for the transaction
of the corporate business, and also to purchase or accept any
real estate in payment or part payment of any debt due to the
corporation, and convey or lease realty and dispose of personalty,
for corporate purposes.
- (4) To establish by-laws and make all rules and regulations not
inconsistent with the laws and Constitution, deemed expedient
for the management of corporate affairs.
- (5) To appoint such subordinate officers and agents in addition to a
president, secretary, or treasurer, as the business of the
corporation may require, designate the name of the office, and
fix the compensation of the officer.
- (6) The amount of each share of capital stock may be changed from
time to time, by the board of directors when duly authorized by
the stockholders in an annual meeting or a meeting specially
called for the purpose and fixed at one hundred, fifty, twenty-
five, twenty, ten, five or one dollars, and printed on the
certificates.
- (7) Subject to such limitations, if any, contained in its charter,

any amendment thereof, or in statutes or laws applicable, to borrow money and contract debts proper for the transaction of its corporate business or for any other lawful purpose; to issue bonds, debentures, promissory notes, bills of exchange or other evidences of debt, either secured or unsecured, with power to secure same by the execution of a corporate mortgage, trust deed, pledge, or otherwise, upon corporate property, real or personal.

The following restrictions and provisions are coupled with said grant of powers:

- (1) A failure to elect officers at the proper time does not dissolve the corporation; but those in office hold until the election or appointment and qualifications of their successors.
- (2) The term of all officers may be fixed by the by-laws of the corporation; the same not, however, to exceed two years.
- (3) The corporation may, by by-laws, not inconsistent with law, make regulations concerning the subscription for or transfer of stock.

The board of directors shall be composed of five or more members.

We, the undersigned, apply to the State of Tennessee, for a charter of incorporation for the purposes and with the powers, restrictions and provisions set out in the foregoing instrument.

Witness our signature, this 4th day of August, 1955.

F. C. Merrell
F. C. Merrell

Thomas Ed Merrell
Thomas Ed Merrell

Dealie Ferguson Merrell
Dealie Ferguson Merrell

Marie Merrell Broadway
Marie Merrell Broadway

David E. Cheatham
David E. Cheatham

STATE OF TENNESSEE

COUNTY OF GILES

Personally appeared before me, Mary W. Craine, a Notary Public in and for the state and county aforesaid, F. C. Merrell, Thomas Ed Merrell, Dealie Ferguson Merrell, Marie Merrell Broadway, David E. Cheatham, the bargainors, with whom I am personally acquainted, and who acknowledged that they executed the foregoing instrument for the purposes therein contained.

Witness my hand and official seal of office at Pulaski, Tennessee, on this 4th day of August, 1955.

My commission expires July 14, 1958.

s/ MARY W. CRAINE
Notary Public

EXHIBIT D

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-112, as amended, Ardmore Telephone Company Incorporated (“Ardmore”) submits this small and minority-owned Telecommunications business participation plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to provide competing intrastate and local exchange services in Tennessee.

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. Ardmore 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. Ardmore 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, Ardmore will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Ardmore of such opportunities. Ardmore’s 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, Ardmore 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

Ardmore's 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 Ardmore's full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Trevor Bonnstetter, CEO
Ardmore Telephone Company Incorporated
Ardmore Telephone Company Incorporated
P.O. Box 549
30190 Ardmore Avenue
Ardmore, Alabama 35739
Telephone: (270) 856-8890

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 Public Utility Commission.

- (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 Public Utility Commission, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperating with the Tennessee Public Utility Commission, 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 Public Utility Commission.
- (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 Ardmore 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

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

Ardmore Telephone Company Incorporated

By: Trevor Bonnstetter
Administrator

Dated: September 29, 2017.

EXHIBIT E

**ARDMORE TELEPHONE COMPANY INCORPORATED'S
PRE-FILED TESTIMONY**

STATE OF TENNESSEE
BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

IN RE:)	
)	
APPLICATION OF ARDMORE)	
TELEPHONE COMPANY)	
INCORPORATED FOR A CERTIFICATE)	Docket No.
OF CONVENIENCE AND NECESSITY)	
TO PROVIDE INTRASTATE)	
TELECOMMUNICATIONS SERVICES)	
STATEWIDE)	

PRE-FILED TESTIMONY OF

TREVOR BONNSTETTER ON BEHALF OF ARDMORE

TELEPHONE COMPANY INCORPORATED

OCTOBER 4, 2017

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

2 **A.**My name is Trevor Bonnstetter, and my business address is 237 North 8th Street,
3 Mayfield, KY 42066.

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

5 **A.**I am the Chief Executive Officer of Ardmore Telephone Company Incorporated
6 ("Ardmore").

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

9 **A.**I have been involved in the telecommunications industry for over 30 years. Over
10 the course of my professional career, I have served in several roles, including General
11 Manager of River Valley Telephone Cooperative in Graettinger, IA, past President of the
12 Tennessee Telecommunications Association Board, current National Exchange Carrier
13 Association board member, and current board member of IRIS Networks in Nashville,
14 TN. I joined West Kentucky and Tennessee Telecommunications Cooperative
15 Corporation ("WK&T") in 1998. I graduated from the Walden University – Minneapolis,
16 Minnesota in 2011 with a PhD, from William Woods University, Fulton, MO, in 2006,
17 cum laude with a MBA, and from Mid Continent University, Mayfield, KY, in 2001, cum
18 laude with a B.S. in Organization Leadership.

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

20 **A.**I am testifying on behalf of Ardmore Telephone Company Incorporated.

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

22 A. The purpose of my testimony is to support the *Application of Ardmore Telephone*
23 *Company Inc. for A Certificate of Public Convenience and Necessity to Provide*
24 *Intrastate Telecommunications Services Statewide* (the “Application”).

25 **Q. PLEASE DESCRIBE THE CORPORATE STRUCTURE OF ARDMORE.**

26 A. Ardmore is a Tennessee telecommunications company incorporated in Tennessee
27 in 1955. Since 2009, Ardmore is a wholly-owned subsidiary of Synergy Technology
28 Partners, Inc. Synergy Technology Partners, Inc. is a wholly-owned subsidiary of
29 WK&T.

30 Ardmore is currently authorized to provide a full array of telecommunications
31 services in certain areas in the State of Tennessee, primarily Giles and Lincoln counties.
32 Ardmore is also authorized to provide a full array of telecommunications in the State of
33 Alabama, primarily Limestone and Madison counties. A copy of Ardmore’s charter is
34 attached as Exhibit C to the *Application*.

35 **Q. PLEASE DESCRIBE ARDMORE’S OPERATIONS IN THE STATE OF**
36 **TENNESSEE.**

37 A. Since 1955, Ardmore has provided telecommunications services in Tennessee.
38 Ardmore currently offers broadband, telephone, sling television, and security services
39 throughout its existing service area.

40 **Q. DOES ARDMORE PROVIDE SERVICES IN ANY STATES OTHER THAN**
41 **TENNESSEE?**

42 A. Yes. As I noted earlier, Ardmore is authorized to operate in the State of Alabama
43 as well.

44 **Q. WHAT IS ARDMORE SEEKING IN ITS APPLICATION IN THIS DOCKET?**

45 **A.** Ardmore is currently seeking authority to provide intrastate telecommunications
46 services throughout the State of Tennessee as a Competitive Local Exchange Carrier
47 (“CLEC”). Ardmore is aware of all the requirements necessary in order to expand its
48 offerings statewide as a CLEC. At this time, Ardmore only intends to expand its
49 offerings from time to time as business conditions warrant. To the extent that any rural
50 incumbent local exchange carrier possesses an exemption or suspension under Section
51 251(f) of the Federal Communications Act (the “Act”) that would apply to Ardmore’s
52 proposed expanded operations, Ardmore does not seek interconnection under Section
53 251(c) at this time, nor does Ardmore seek at this time to challenge any such exemption
54 from any of the other obligations specified in Section 251(c) of the Act.

55 Ardmore will offer directory services and E911 in the proposed service area.

56 **Q. WHY IS ARDMORE SEEKING EXPANDED AUTHORITY?**

57 **A.** Ardmore desires to expand its offerings of telecommunications services
58 throughout the State of Tennessee in order to provide more consumers with increased
59 carrier choices, competitive pricing, increased reliability, responsiveness, and innovation.
60 The granting of this *Application* will provide significant benefits to Tennessee consumers
61 and thereby serve the public interest.

62 **Q. DOES ARDMORE MEET THE STATUTORY REQUIREMENTS SET FORTH**
63 **IN TENN. CODE ANN. § 65-4-201(c)?**

64 **A.** Yes. As set forth in the Application, Ardmore is a seasoned, experienced
65 telecommunications provider in the State of Tennessee and certainly has the managerial,
66 financial and technical abilities required under Tennessee law. Our Application

67 evidences that we have gained valuable experience as a telecommunications provider
68 over the many decades of exceptional services. This experience provides Ardmore with
69 the foundation necessary to provide the proposed telecommunications services and to
70 further serve Tennessee's telecommunications consumers. As supported by **Exhibit A** to
71 the Application, Ardmore is managerially and technically qualified to provide
72 telecommunications services statewide. As shown in this exhibit, Ardmore's principal
73 corporate offices, board members and staff have substantial managerial and technical
74 experience in the relevant areas, including utility operations, utility customer service and
75 utility marketing. This experience provides Ardmore with the foundation necessary to
76 provide the proposed telecommunications services and to serve Tennessee's
77 telecommunications consumers. Therefore, Ardmore is managerially and technically
78 qualified to offer the proposed services.

79 Moreover, Ardmore is financially qualified to provide the proposed
80 telecommunications services statewide. As a provider of telecommunications services in
81 Tennessee, Ardmore operates profitably. Attached as **PROPRIETARY AND**
82 **CONFIDENTIAL UNDER SEAL Exhibit B** to the *Application* is Synergy
83 Technology Partners, Inc.'s Independent Auditor's Reports and Consolidated Financial
84 Statements with Supplementary Information for December 31, 2016 and 2015, which
85 confirms that Ardmore is financially qualified to provide telecommunications services
86 statewide. **CONFIDENTIAL Exhibit B** is being submitted **UNDER SEAL** as
87 **CONFIDENTIAL AND PROPRIETARY.**

88 **Q. WILL ARDMORE COMPLY WITH THE TPUC'S POLICIES, RULES, AND**
89 **ORDERS?**

90 Yes. And, subsequent to the approval of its *Application*, Ardmore will file any
91 necessary tariffs or tariff revisions prior to expanding its service offerings beyond those
92 already permitted. Further, a certificate of service stating that notice of this *Application*
93 has been served on all seventeen (17) incumbent local exchange telephone companies in
94 Tennessee is evidenced by the Certificate of Service attached to the *Application*.
95 Ardmore's Small and Minority-Owned Telecommunications Business Participation Plan
96 is provided as **Exhibit D** of the *Application*.

97 **Q. WILL ARDMORE COMPLY WITH STATE LAW IN RELATION TO ITS**
98 **REQUEST FOR AUTHORITY?**

99 A. Yes.

100 **Q. WILL THE GRANTING OF THE APPLICATION SERVE THE PUBLIC**
101 **INTEREST?**

102 A. Yes. The granting of the *Application* will further the public interest by expanding
103 the availability of telecommunications services, consistent with state law. Specifically,
104 Tennessee consumers will continue to benefit directly through the use of the competitive
105 services offered by Ardmore. Further, the public will benefit through the continued and
106 expanded competitive presence of Ardmore, which will increase the incentives for
107 telecommunications providers to operate more efficiently, offer more innovative services,
108 reduce prices, and improve the quality and coverage of their services. The granting of the
109 *Application* would be consistent with the public policy of the State of Tennessee, as set
110 forth at Tenn. Code Ann. § 65-4-123, "to foster the development of an efficient,

111 technologically advanced statewide system of telecommunications services by permitting
112 competition in all telecommunications services market[.]”

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

115 **A. Yes.**

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

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