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August 2, 2018

Hon. Herbert Hilliard, Chairman  
Tennessee Public Utilities Commission  
502 Deaderick Street  
Nashville, TN 37238

Re: 2018 Annual State Certification of Support for Eligible Telecommunications Carriers  
Pursuant to 47 C.F.R. § 54.314

Docket No. 17-00068


Dear Chairman Hilliard:

This letter is to request that the Tennessee Public Utility Commission ("Commission") submit a letter to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") certifying that BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ("AT&T Tennessee") is in compliance with all provisions of Section 254(e) of the Telecommunications Act.

The amount of federal high-cost support AT&T Tennessee will receive in 2019 will be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, AT&T Tennessee certifies that it will only use the federal high cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended.<sup>1</sup>

AT&T Tennessee respectfully requests that the Commission accept this letter and the attached affidavit as self-certification that AT&T Tennessee is in compliance with 47 U.S.C. § 254(e) and issue a letter to the FCC and USAC certifying that AT&T Tennessee used its high-cost support in the preceding year (2017) and will use its high-cost support in the coming calendar year (2019) in compliance with Section 254(e) of the Act and therefore is eligible to receive federal high-cost support in 2019.

Sincerely,



Dennis Wagner

<sup>1</sup> On October 27, 2016 AT&T Tennessee filed a Petition seeking to relinquish its ETC designation in specified service areas. (Docket No. 16-00123). AT&T retained its ETC designation in the CAF II eligible census blocks and CAF II extremely high-cost census blocks. On March 24, 2017, the Commission issued its Order granting approval of AT&T's relinquishment of its ETC designation in specified areas while retaining its ETC status in the particular CAF II areas, effective July 5, 2017.

**AT&T**

SW/mhs  
Attachment

**AT&T**

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In RE: 2018 Annual State Certification of Support for Eligible Telecommunications  
Carriers Pursuant to 47 C.F.R. § 54.314

Docket No. 17-00068

**AFFIDAVIT OF JEFF A. VAN DYKE**

STATE OF TENNESSEE  
COUNTY OF DAVIDSON

Comes Now Jeff A. Van Dyke and states as follows:

1. My name is Jeff A. Van Dyke. I am employed by BellSouth Telecommunications, LLC dba AT&T Tennessee ("AT&T Tennessee") as AVP-Legislative Affairs and am authorized to give this Affidavit. This Affidavit is being given to support the Tennessee Public Utility Commission's ("Commission") certification as required by 47 C.F.R. § 54.314(a).
2. In order for the Commission to certify AT&T Tennessee's continued eligibility for high-cost support in 2019, AT&T Tennessee provides the following certification.
3. Consistent with Section 254(e) of the Communications Act of 1934, as amended, AT&T Tennessee used its high-cost support in the preceding year (2017) and will use its high-cost support in the coming calendar year (2019) as all of its federal high-cost support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.



Jeff A. Van Dyke

AVP-Legislative Affairs, AT&T Tennessee