



20-00125

November 10, 2020

FILED ELECTRONICALLY

Chairman Kenneth C. Hill
Tennessee Public Utilities Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: Notice of Pro Forma Corporate Restructuring of Volunteer First Services, LLC. ID No. 128878

Dear Chairman Hill:

Attached please find our notice of Pro Forma Corporate Restructuring of Volunteer First Services, LLC.

Please contact me if you need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Cope". The signature is fluid and cursive, with the first name "Lisa" and last name "Cope" clearly distinguishable.

Lisa Cope
President
Volunteer First Services, LLC



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502 Deaderick Street, 4th Floor
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RE: Notice of Pro Forma Corporate Restructuring of Volunteer First Services, LLC. ID No. 128878

Dear Chairman Hill:

Volunteer First Services, LLC ("VolFirst Services") hereby respectfully notifies the Tennessee Public Utilities Commission ("the Commission") of a planned pro forma corporate restructuring of VolFirst Services, a company authorized to provide telecommunications service in the State of Tennessee ("Restructuring"), pursuant to a Certificate of Public Convenience and Necessity ("CPCN") granted by the Commission.

As a result, and based on our review of Tennessee statutes and regulations, VolFirst Services believes that prior approval is not required to complete the restructuring described herein. However, if the Commission determines that approval of the restructuring is required, VolFirst Services respectfully requests the Commission consider this notice to be VolFirst Services' application for expedited approval of the Restructuring.

A. VolFirst Services

VolFirst Services is a wholly owned subsidiary of Ben Lomand Holdings, Inc., and is a Tennessee limited liability corporation located at 205 O'Brien Drive, Crossville, Tennessee, 38557 and is authorized to provide competing local telecommunications services in the State of Tennessee pursuant to a CPCN granted by the commission on April 30, 2004, Docket No. 03-00607. VolFirst Services primary business is to provide essential telecommunications and broadband to their customers.

B. Description of Planned Internal Restructuring

For corporate and business reasons, VolFirst Services desires to perform an internal corporate reorganization through which VolFirst Services will merge with Ben Lomand Communications, LLC., ("BLC LLC") another wholly owned subsidiary of Ben Lomand Holdings, Inc. BLC LLC was also awarded a CPCN granted by the Commission on April 28, 1999 for White and Warren counties, Docket No. 98-00600. BLC LLC petitioned the Commission for state-wide CPCN and was granted approval on January 13, 2009, Docket No. 08-00210.

VolFirst Services (ID No. 128878) and BLC (ID No. 128221) are both Market Regulated companies.

Following the merger, BLC LLC will provide service to the existing customers of VolFirst Services, under its' existing state-wide CPCN. Customers will continue to receive their existing services at the same rates, terms and conditions as prior to the transfer. The company will then be recognized as Ben Lomand Communications, LLC, dba Ben Lomand Connect.

The management of VolFirst Services will remain the same, and there will be no meaningful change in the ownership or services. VolFirst Services will transfer all assets to BLC LLC.

C. Public Interest Considerations

VolFirst Services minor restructuring will not adversely affect the public interest. The restructuring will not result in any material change to the ownership, management, customer service, billing address or even phone number of the entity currently authorized to provide telecommunications services. The day to day operations of the company will remain unchanged. Nor does the planned restructuring affect the technical, managerial or financial qualifications of VolFirst Services to provide telecommunications services. We also expect the merger to yield operational and financial benefits to the holding company.

We seek a waiver for the requirement that the customer notification letter be sent to customers thirty days prior to the merger and approval to insert the notification in the customer's bill. The bill insert would inform the customers that they are not being moved to a new carrier but that a corporate merger has occurred.

We also ask that the commission consider the pro-forma nature of the reorganization so no Federal Communications Commission self-certification letter be required.

For the reasons state above, VolFirst Services respectfully submits that the public interest, convenience and necessity would be furthered by the planned restructuring. Accordingly, VolFirst Services advises the Commission of its intent to consummate this restructure as soon as possible. If the Commission requires any further information from VolFirst Services, we respectfully request the Commission contact VolFirst Services within 10 days from receipt of this notice.