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97 APR 15 PM 2 58

April 15, 1997

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

Re: Universal Service Proceeding
Docket No: 95-2499

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Petition of AT&T Communications of the South Central States, Inc. for Termination of this Docket and Commencement of a New Generic Contested Case Proceeding, along with our check in the amount of \$25.00 in payment of the filing fee. Copies are being served in accordance with the Certificate of Service.

Yours very truly,



Val Sanford

VS/ghc
Enclosures

cc: James P. Lamoureux, Esq.
Garry Sharp

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PLEASE
DO NOT REMOVE

97-00888

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: UNIVERSAL SERVICE PROCEEDING

DOCKET NO. 95-02499

RECEIVED
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EXECUTIVE SECRETARY

**PETITION OF AT&T COMMUNICATION OF THE
SOUTH CENTRAL STATES, INC. FOR TERMINATION OF
THIS DOCKET AND COMMENCEMENT OF A NEW GENERIC
CONTESTED CASE PROCEEDING**

AT&T Communications of the South Central States, Inc. here ("AT&T") respectfully petitions the Authority to terminate this docket and to convene a new generic contested case proceeding pursuant to T.C.A. §65-5-207 and to set a pre-hearing conference for the purpose of defining issues and setting a schedule for the disposition of the case; and for grounds states that:

JURISDICTION AND POWERS OF THE AUTHORITY

1. T.C.A. §65-5-207 governs universal service. Subsection (a) defines universal service and directs the Authority to formulate policies, promulgate rules and issue orders to require all telecommunications service providers to contribute to the support of universal service. Subsection (b) directs the Authority¹ to commence a generic contested case proceeding to determine the cost of providing universal service, determine all current sources of support for universal service and their associated amounts, identify and assess alternative universal service support mechanisms, and determine the need and timetable for modifying current universal

¹As enacted the Tennessee Public Service Commission was directed to initiate the proceeding by July 6, 1995 and complete it by January 1, 1996. The statute as now codified changes "Commission" to "Authority" without changing the dates.

service support mechanisms and implementing alternative universal service support mechanisms. Subsection (c) sets forth the criteria to be followed by the Authority in determining whether to create an alternative mechanism and for such a mechanism. Subsection (d) directs the Authority to monitor the continued functioning of universal service mechanisms and to conduct investigations, issue show cause orders, entertain petitions or complaints, or adopt rules in order to assure that the universal service mechanism is modified and enforced in accordance with the criteria set forth in that section. Subsection (e) provides that nothing in that section shall be construed to require the Authority to raise residential basic local exchange telephone service rates.

THE INTERESTS OF AT&T

2. AT&T was granted the first certificate of convenience and necessity to operate as an interexchange carrier ("IXC") in Tennessee. Since January 1, 1984 AT&T has been operating as an IXC in Tennessee, and as such has been paying access charges. As set forth in AT&T's petition for the convening of a generic contested case for the purpose of access charge reform, which is being filed contemporaneously with this petition, the existing access charge system in Tennessee was established, and has been maintained, to provide an implicit, undefined subsidy to local exchange carriers. The imposition of such a subsidy is inconsistent with a policy of competition and with present state and federal law. The access charge system should be reformed, and access charges should be cost based. Consistent with T.C.A. §65-5-207, and with Section 254 of the *Federal Telecommunications Act of 1996*, a new universal service system should be adopted, replacing the existing implicit, undefined system with a system which is equitable, non-discriminatory, specific, predictable and sufficient in accordance with present law and policy.

PROCEEDINGS BEFORE THE TENNESSEE PUBLIC SERVICE COMMISSION

3. The Tennessee Public Service Commission (here "TPSC") issued an order on June 29, 1995 commencing the generic contested case proceeding. After receiving cost studies and holding a hearing, the TPSC, on December 5, 1995, served a notice requiring the filing of further cost studies by December 12, 1995, which notice was confirmed in the TPSC's order of December 19, 1995. In that order the TPSC stated, "Our review (of the cost studies filed) led to a disturbing conclusion that the companies had failed to respond sufficiently to the June 29 Order." The TPSC further stated,

"The companies, parties to this proceeding, have obstructed the ability of the Commission as fact-finder to determine the cost of universal service. To remedy this, the Commission must, in order to obtain reliable and complete information essential to this determination, request cost studies with great specificity and uniformity in the methodology by which the studies are prepared. Any other decision at this point would be based on such incomplete and potentially incorrect criteria as to be arbitrary."

The TPSC then ordered:

1. That embedded cost studies as set forth in detail in the text of this Order shall be provided to the Commission by Monday, December 11, 1996.
2. That the Commission shall, upon review of the embedded cost studies, determine, as required by T.C.A. 65-5-207 (c), whether the creation of an alternative universal service support mechanism is essential.
3. That total service long run incremental cost studies, including a contribution to common cost for calendar year 1995, shall be provided to the Commission no later than June 30, 1996.

4. That embedded cost studies, as set forth in this Order, for calendar year 1995, shall be provided to the Commission no later than June 30, 1996.

4. On February 7, 1996, the TPSC entered a further order in which it concluded:

As the costs of universal service are covered by the current support mechanisms and are not under immediate competitive threats, no alternative universal service support mechanism is necessary at this time. Nevertheless, alternative support mechanisms may be desirable in order to encourage economic and fair competition, to prevent cross-subsidies among the incumbent companies' services, and to insure that universal service is adequately supported as competition grows. To this end, we will continue our examination of universal service costs and supports, with the goal of determining appropriate alternative universal support mechanisms, if needed, by early in 1997.

The TPSC then ordered:

1. That no alternative universal support mechanisms will be established at this time.
2. That following the submission, on or before June 30, 1996, of the cost studies described in our December 19, 1995 Order, the Commission shall convene a Prehearing Conference to identify issues and establish a schedule for filing testimony and convening hearings in order to determine appropriate alternative universal service support mechanisms, if needed.

5. The local exchange carriers filed cost studies in June and July, 1996, but no actions have been taken with respect to those studies.

6. In anticipation of the termination of its existence, the TPSC on June 28, 1996 entered an order terminating all proceedings before it.

SUBSEQUENT PROCEEDINGS

7. On August 7, 1996, the Authority issued its Administrative Order No. 2 in which it recommenced this and certain other proceedings. In that Order the Authority stated that in order for the record before the TPSC to be adopted by the Authority, the parties must agree to stipulate to the record. If any party refused to stipulate, then the TRA could commence a new proceeding.

8. No further actions have been taken in this proceeding. The parties have not stipulated as to the record before the TPSC.

THE EFFECT OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996 AND THE ACTIONS OF THE FCC PURSUANT THERETO

9. Section 254 of the Federal Telecommunications Act of 1996 required the FCC to institute and refer to a Federal-State Joint Board a proceeding to recommend changes in universal service, directing the Joint Board to make its recommendations within nine months after the effective date of the Federal Act. Such a Joint Board was duly initiated and on November 7, 1996 it adopted a "Recommended Decision Regarding Universal Service", which appears at 61 Fed. Reg. 63778, et seq.

10. The FCC is required to initiate a single proceeding to implement the recommendations of the Joint Board and to complete that proceeding within 15 months after the effective date of the Federal Act, by May 7, 1997.

11. The Federal Act sets forth certain universal service principles, defines universal service, provides for telecommunications carrier contributions and universal service support, and includes other provisions. Subsection (f) of Section 254 provides:

STATE AUTHORITY.--A State may adopt regulations not inconsistent with the Commission's rules to preserve and advance universal service. Every telecommunications carrier that provides intrastate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, in a manner determined by the State to the preservation and advancement of universal service in that State. A State may adopt regulations to provide for additional definitions and standards to preserve and advance universal service within that State only to the extent that such regulations adopt additional specific, predictable, and sufficient mechanisms to support such definitions or standards that do not rely on or burden Federal universal service support mechanisms.

12. Subsection (i) provides:

CONSUMER PROTECTION.--The Commission and the States should ensure that universal service is available at rates that are just, reasonable, and affordable.

13. Subsection (k) provides:

SUBSIDY OF COMPETITIVE SERVICES PROHIBITED.--A telecommunications carrier may not use services that are not competitive to subsidize services that are subject to competition. The Commission, with respect to interstate services, and the States, with respect to intrastate services, shall establish any necessary cost allocation rules, accounting safeguards, and guidelines to ensure that services included in the definition of universal service bear no more than a reasonable share of the joint and common costs of facilities used to provide those services.

14. Any universal service mechanism in Tennessee must be consistent with the pertinent provisions of the Federal Act and the rules of the FCC.

THE NEED FOR A NEW PROCEEDING

15. As the TPSC discovered in attempting to carry out its responsibilities under T.C.A. §65-5-207, the task of assessing any universal service support mechanism is complex and difficult. The TPSC, as its orders reflect, did not complete the tasks assigned it under

T.C.A. §65-5-207(b) and (c). Indeed, the TPSC expressly contemplated further proceedings. In order to complete the task it will be necessary to adopt a specific, carefully considered plan for managing the proceeding, identifying the issues, obtaining the necessary information, affording all concerned with a full and fair opportunity to be heard and organizing and scheduling a hearing designed to focus on the relevant issues.

16. No useful purpose would be served by attempting to carry forward the proceeding before the TPSC. The record in that matter is stale and incomplete and would now be largely of historical significance. All parties may well not agree to stipulate to that record, requiring a new proceeding in any event. The decisions made in the arbitration proceedings and in other proceedings have changed the context. A new proceeding is appropriate and necessary to take into account the new and changing circumstances.

17. In any further universal service proceeding it will be necessary to take into account the effect of the Federal Act and the rules adopted by the FCC. As a result thereof, new issues will arise and a different emphasis may be required.

18. However, the Authority should not wait until after the FCC promulgates its universal service rules before convening a new proceeding. To do so would unnecessarily delay the organization and development of a plan for the conduct of that proceeding.

19. Contemporaneously with the filing of this petition, AT&T is also filing a petition for the convening of a generic contested case for the purpose of access charge reform. That proceeding and this proceeding will involve some common issues and the conduct of the two proceedings should be coordinated in order to avoid unnecessary duplication of effort.

20. The Authority should, therefore, as soon as practicable after the filing of this Petition, enter an order terminating this proceeding and an order convening a new generic contested case proceeding; naming all telecommunications service providers subject to the

regulation of the TRA as parties; providing for the service of notice of the proceeding on all such telecommunications service providers; setting a status conference at an early date for the purpose of developing a plan and a schedule for the management of the proceeding, identifying the issues, including the effect of the Federal Act and the FCC's rules, obtaining the necessary information, affording all concerned with a full and fair opportunity to be heard and setting dates for hearings. In so doing the Authority may well wish to consider proceeding in stages or otherwise identifying issues for separate consideration.

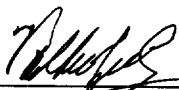
21. The present undefined, implicit sources of universal service support are not consistent with either T.C.A. §65-5-207 or §254(f) of the Federal Act. Contributions to universal service must be equitable and non-discriminatory and mechanisms for support must be specific, predictable and sufficient, in addition to meeting the criteria set forth in T.C.A. §65-5-207. Carrying out universal service policies is of paramount importance and urgency.

WHEREFORE, AT&T Communications of the South Central States, Inc. prays that:

1. The Authority enter an order dismissing this docket;
2. The Authority enter an order convening a new generic contested case proceeding pursuant to T.C.A. §65-5-207, naming all telecommunications service providers as regulated by the Authority as parties and serving an appropriate notice on all such telecommunications service providers;
3. The Authority set a status conference at an early date for the purpose of developing a plan for managing and scheduling the proceeding, identifying the issues, obtaining the necessary information with respect to those issues, affording all concerned with a full and

fair opportunity to be heard and organizing and scheduling a hearing or hearings designed to focus on the relevant issues; and

4. The Petitioner have such other, further and general relief as the justice of its cause may entitle it to receive.



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CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that I have served a copy of the foregoing Petition on the Consumer Advocate, all incumbent local exchange companies, all competing telecommunications service providers, all interexchange carriers and all resellers certificated by this Authority, by depositing a copy of the same in the United States mail, postage pre-paid, to their addresses as shown on the records of the Authority in the attached lists, this 15th day of April, 1997.



Valerius Sanford

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COMPETING LOCAL TELECOMMUNICATIONS PROVIDERS

April 10, 1997

Page 1 of 8

Docket No.
& Approval Date

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April 10, 1997
Page 2 of 8

Docket No.
& Approval Date

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April 10, 1997
Page 3 of 8

Docket No.
& Approval Date

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April 10, 1997

Page 5 of 8

Docket No.
& Approval Date

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April 10, 1997
Page 6 of 8

Docket No.
& Approval Date

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April 10, 1997
Page 7 of 8

Docket No.
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Page 8 of 8

Docket No.

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(615) 364-2289

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Telephone Electronics Corp.
WEST TENNESSEE TELEPHONE CO
P. O. Box 2146
Monroe, LA 71207
(318) 322-0015

360 Long Distance, Inc.
O'Hare Plaza, 8725 Higgins Rd,
Suite 330
Chicago, il 60631
Gary Williams 4232394143

ACC National Long Distance Corp
ACC
400 West Ave.
Rochester, ny 14611
Richard Ottalagana 7169873224

Access Point, Inc.
1100 Crescent Green, Suite 109
Cary, nc 27511
Lance Steinhart 7702329200

All American Telephone, Inc.
2020 W. Northwest Hwy., Suite 107
Grapevine, tx 76051
Dana Hoyle 8172814727

Ameri-Net Services Corp.
5140 W. Hurley Pond Rd.
Farmingdale, nj 07727
Stacey A. Wilk 9083031771

American Business Alliance, Inc.
ABA or Commercial Phone Group,
Inc.
220 Division Street
Kingston, pa 18704
Douglas K. Window 7172830247

A.B.T.S. International Corp.
IntelNet
432 Kelley Dr.
West Berlin, nj 08091
Michael A. Dalia 6097683737

Access Network Services, Inc.
8201 Preston Road, Suite 350
Dallas, tx 75225
Kurt Lang 2146924030

Advanced Telecommunication
Network, Inc.
Advanced
Four Executive Campus, Suite 200
Cherry Hill, nj 08002
Gary K. Carpenter 6096628700

Alternative Long Distance
Money Savers
301 Congress Ave, Suite 720
Austin, tx 78701
Jill Wentz 5124042250

America's Tele-Network Corp.
720 Hembree Place
Alpharetta, ga 30076
Charles Helein 7037141300

American Express Telecom, Inc.
4315 South 2700 West
Salt Lake City, ut 84184
Lance Steinhart 7702329200

American Farm Bureau
The Farm Bureau Connection
225 Touhy Ave.
Park Ridge, il 60068
Patrick Crocker 6163818844

American International Telephone,
Inc.
287 Bowman Ave.
Purchase, ny 10577
Charles Eisenberg 9142511450

American Network Exchange, Inc.
AMNEX
100 West Lucerne Circle, Suite 100
Orlando, fl 32801
Amy S. Gross 4072461234

American Tel Group, Inc.
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Albuquerque, nm 87111
Ralph Roberts 8008282317

American Telco, Inc.
100 Waugh Drive, Suite 200
Houston, tx 77007
Alan Smith 2147531378

American Telecommunications
Enterprise, Inc.
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Carl Worboys 5154532323

American Teltronics Long Distance,
Inc.
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Chicago, il 60602
Christina Weiksnar 3123727575

Americom Technologies, Inc.
Network Utilization Services
6080 Huntwick Terrace, Suite 308
Delray Beach, fl 33484
Michelle Post 8005760320

AmeriConnect, Inc.
6750 W. 93rd St., #110
Overland Park, ks 66212
Janet Flynn 8003594329

Ameritech Communications
International, Inc.
9525 West Bryn Mawr, Suite 600
Rosemont, il 60018
Jeffery R. Lowe 3122513487

AmeriVision Communications, Inc.
8001 South I-35, Suite 101
Oklahoma City, ok 73149
Carl Thompson 4053667550

Anchor Communications
Corporation
4301 32nd Street West, Suite C-15
Bradenton, fl 34205
Tina Lee 9417273303

Annox, Inc.
POB 230
Pleasant View, tn 37146
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Apollo Communication Services,
LLC
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Rolling Meadows, il 60008
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ATCALL, Inc.
Lifesaver Communications
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Arlington, va 22201
Khaled Alhegelan 7035225252

Athena International, LLC
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Patrick Crocker 6163818844

Atlas Communications, Inc.
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Patrick Crocker 6163818844

ATN Communications, Inc.
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Automated Communications, Inc.
AC America, Inc.
1687 Cole Blvd., POB 4087
Golden, co 80401
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Bell Atlantic Communications, Inc.
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BellSouth Public Communications,
Inc.
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Bob Burnett 2059432672

Ben Lomand Communications, Inc.
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McMinnville, tn 37110
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BFI Communication, Inc.
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Patrick Crocker 6163818844

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7411 John Smith, Suite 200
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2109497000

Budget Call Long Distance, Inc.
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Business Discount Plan, Inc.
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Cellnet Telecommunications of
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C-Net Communications
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BLT
610 Esther St., Suite 1000
Vancouver, wa 98660
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Buehner-Fry, Inc.
Resort Operator Services and
DirectDial USA
56151 Solar Dr.
Sunriver, or 97707
Susan Davis Morley 9042221534

Business Options, Inc.
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Merrillville, in 46410
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Cable & Wireless, Inc.
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Abacus Communications Co.
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CFW Communications Services, Inc.
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Rodney Hyatt 8002393000

DeltaTel, Inc.
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Carmel, in 46032
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GTE Long Distance (GTECS)
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Global Page Communications
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Delray Beach, fl 33483
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Covington, ga 30209
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Las Vegas, nv 89109
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Discount Plus
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2
Santa Fe Springs, Ca 90670
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391 Roberts Rd., Suite 4
Oldsmar, fl 34677
Frank Carosella 8138557511

LDD, Inc.
24 South Minnesota St.
Cape Girardeau, mo 63702
Shirlene Krewson 3146513373

LDM Systems, Inc.
900 Comerica Bldg.
Kalamazoo, mi 49007
Patrick Crocker 6163818844

Least Cost Routing
Least Cost Routing for Small
Businesses, Inc.
2944 Heather Trail
Clearwater, fl 34621
Herb Zerden 8137077858

Least Cost Routing
Distance Charges, Inc.
1801 E. Edinger, Suite 125
Santa Ana, ca 92705
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Pearl River, ny 10965
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Long Distance of Michigan, Inc.
LDMI Long Distance
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Hamtramck, mi 48211
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Long Distance Wholesale Club
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Telscape USA, Inc.
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The Furst Group, Inc.
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Thrifty Call, Inc.
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Total National Communications
Total World Telecom
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TotalTel USA Communications, Inc.
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Transcommunications, Inc.
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TTI National, Inc.
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TW Communications, Inc.
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U.S. South Communications, Inc.
US South, INCOMM
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