

BASS, BERRY & SIMS PLC

A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

T. G. PAPPAS
TEL: (615) 742-6242
FAX: (615) 742-6293

2700 FIRST AMERICAN CENTER
NASHVILLE, TENNESSEE 37238-2700
(615) 742-6200

KNOXVILLE OFFICE:
1700 RIVERVIEW TOWER
KNOXVILLE, TN 37901-1509
(423) 521-6200

November 14, 1997

HAND DELIVERED

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket No. 97-00888
Request for Designation as Eligible Telecommunication Carrier
Century Telephone of Claiborne, Inc.

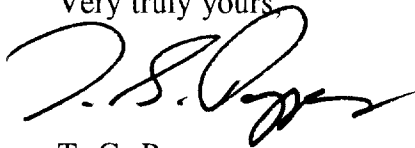
Dear Mr. Waddell:

Enclosed please find an original and thirteen (13) copies of the Request of Century Telephone of Clairborne, Inc. for designation as an Eligible Telecommunications Carrier pursuant to the TRA's Order of November 3, 1997.

We would appreciate it if you would call the filing of this Request to the attention of the Directors for their consideration.

Thanking you, with kindest regards, I remain

Very truly yours,



T. G. Pappas

TGP/bfs:563867

cc: Dr. Austin Lyons
Dennis McNamee, Esq.
Thomas Moorman, Esq.
Counsel of Record
David Dickey

NASHVILLE, TENNESSEE

Docket No. 97-00888

100

1. As set out in TRA's Order, and pursuant to 47 C.F.R. § 54.201(b) of the rules and regulations of the Federal Communications Commission ("FCC") and 47 U.S.C. § 214(e)(2), the TRA "shall upon its own motion, or upon request, designate a common carrier that meets the requirements of Section 214(e)(1) as an eligible telecommunications carrier for a service area designated by the State Commission." Also, pursuant to 47 U.S.C. § 214(e)(1), a common carrier that has been designated as an eligible telecommunications carrier "shall be eligible to receive universal support in accordance with Section 254."

2. CTC is a "rural telephone company" as defined in 47 U.S.C. § 153(37). CTC meets all of the requirements of an ETC or is entitled to a waiver. Accordingly, in this sworn request CTC affirms that it will: (a) offer and provide the services that are supported by federal universal service mechanisms as defined in 47 C.F.R. § 54.101, except as to the toll control requirement contained within the definition of toll limitation (see paragraph 3 below); (b) provide the services over its own facilities, or a combination of its own facilities and the resale of another carrier's services; (c) that it will advertise the availability of the services that it provides and the charges for those services at each of its business offices, in its telephone directories, and as may otherwise directed by the TRA; and (d) that the service area for which it is requesting ETC status is its incumbent LEC service area which is its "study area," as provided for by 47 U.S.C. § 214(e)(5).

3. With respect to toll limitation services, CTC submits that virtually no LEC in the nation is capable of providing this service as the FCC has defined it. The FCC has defined "toll limitation" as the provision of both toll blocking and toll control. 47 C.F.R. § 54.400(a)(4). CTC believes that the "toll control" requirement was apparently added by the FCC at the final stage of the federal rulemaking without much, if any, comment by LECs. Such service would require real-time capability to record and rate every call instantaneously as the caller attempts to make a toll call. See generally 47 C.F.R. § 54.400(a)(3). The ability to provide this service also assumes that LECs will be able to differentiate between toll calls and other types of calls. CTC has been advised that this misunderstanding regarding rational expectations of LEC capabilities has already been explained to FCC staff, and that the issue will likely be reevaluated in anticipated FCC reconsideration orders. CTC is prepared to offer toll blocking. However,

it is not prepared to offer toll control for the reasons stated above. Given that the matter of toll control is likely to receive reconsideration CTC requests that, in a manner consistent with the requirements of 47 C.F.R. § 54.101(c), the TRA grant a blanket waiver with respect to the offering of the "toll control" requirement until such time as the FCC acts upon reconsideration requests of its decision to require toll control.

4. CTC respectfully requests that the TRA designate and certify CTC as an Eligible Telecommunications Carrier in its "study area" which is its incumbent LEC service area

and grant the waivers as requested. CTC further requests that such designation be made by the TRA prior to January 1, 1998.

Respectfully submitted,

CENTURY TELEPHONE OF CLAIBORNE, INC.

By: Marvin C. Cunningham Jr.
Marvin C. Cunningham, Jr.
Vice President, Revenues and External Affairs

T. G. Pappas
T. G. Pappas (#2707)
Bass, Berry, & Sims PLC
2700 First American Center
Nashville, Tennessee 37238

Thomas J. Moerman
Thomas J. Moerman
Kraskin & Lesse, LLP
2120 L Street, N.W., Suite 520
Washington, D.C. 20037

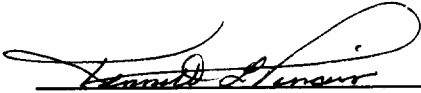
Attorneys for Century Telephone of Claiborne, Inc.

STATE OF LOUISIANA
~~STATE OF TENNESSEE~~)
PARISH OF OUACHITA
~~COUNTY OF KNOX~~)

Marvin C. Cunningham, Jr., after being duly sworn, states that he is Vice President, Revenues and External Affairs, a Senior Officer of Century Telephone of Claiborne, Inc., and that he has read the foregoing Request for Certification as an Eligible Telecommunications Carrier to be filed with the Tennessee Regulatory Authority and that the matters stated therein are true to the best of his knowledge, information, and belief, this 13th day of November, 1997.


Marvin C. Cunningham, Jr.
Vice President, Revenues and External Affairs

Sworn to and subscribed before me this 13th day of November, 1997.



Notary Public

My Commission Expires:

FOR LIFE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed,
U. S. mail, postage prepaid, to the following persons, this the 14th day of November, 1997.

Henry Walker
Attorney for NextLink
P. O. Box 198062
Nashville, TN 37219

Guilford Thornton
Attorney for BellSouth Cellular
424 Church Street
28th Floor
Nashville, TN 37219-2386

Mark Pasko
Swidler & Berlin
Atty. for AVR d/b/a Hyperion of
TN
3000 K Street NW, Suite 300
Washington, DC 20007-5116

Dana Shaffer
NextLink Tennessee
105 Molloy Street
Suite 300
Nashville, TN 37201

Chuck Welch
Attorney for Time Warner
Nashville City Center
511 Union Street, Suite 2400
Nashville, TN 37219

William C. Carriger
Attorney for Electric Power Bd. of
Chattanooga
400 Krystal Building
One Union Square
Chattanooga, TN 37402

James B. Wright
United Telephone-SE
14111 Capital Blvd.
Wake Forest, NC 27587-5900

Pam Melton
Attorney for LCI
8180 Greensboro Drive, Ste. 800
McLean, VA 22102

Val Sanford
Attorney for AT&T
P. O. Box 198888
Nashville, TN 37219-8888

Guy W. Hicks
BellSouth Telecommunications
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

D. Billye Sanders
Attorney for TCG MidSouth
P. O. Box 198966
Nashville, TN 37219-8966

L. Vincent Williams
Consumer Advocate
Cordell Hull Bldg.
Ground Floor
Nashville, TN 37243

H. LaDon Baltimore
Attorney for WorldCom, Ste. 320
211 Seventh Avenue, N.
Nashville, TN 37219-1823

Richard Tettlebaum
Citizens Telecommunications Co.
Suite 500
1400 16th Street NW
Washington, DC 20036

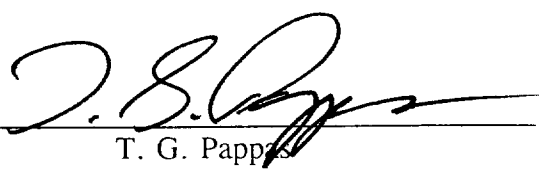
James Lamoureux
AT&T
Room 4068
1200 Peachtree Street, NE
Atlanta, GA 30309

William Ellenburg
and Bennett Ross
BellSouth
675 West Peachtree Street, NE
Suite 4300
Atlanta, GA 30375

Jon Hastings
Attorney for MCI
P. O. Box 198062
414 Union Street, Ste. 1600
Nashville, TN 37219

Dan Elrod
Ken Bryant
Attorneys for GTE Mobilnet
Nashville City Center, 25th Floor
511 Union Street
Nashville, TN 37219

Kim Kirk
Assistant General Counsel
Tennessee Department of
Environment
and Conservation
312 8th Avenue North
Nashville, TN 37243-1548


T. G. Pappas