

June 24, 2025
Via Overnight Delivery

Ms. Darlene K. Standley, Asst. Chief - Telecommunications
Tennessee Public Utility Commission
502 Deaderick Street
4th Floor
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on June 24, 2025 at 6:36 a.m.

RE: **Voluntary Relinquishment of Authority to Provide Operator Services and/or Resell
Telecommunications Services
Network Communications International Corp.
Docket Number 97-07612; Company ID 128073**

Dear Ms. Standley:

Enclosed for filing are the original and four (4) copies of this letter, submitted on behalf of Network Communications International Corp. (the "Company"), to formally notify the Tennessee Public Utility Commission of the Company's voluntary surrender of its authority to provide Operator Services and/or Resold Telecommunications Services within the state of Tennessee.

This authority was originally granted on March 1, 1998, under the above-referenced docket number and Company ID.

Under Tennessee Code Section 65-4-101, the definition of a "Completing telecommunications service provider" is as follows:

- (1) "Competing telecommunications service provider" means any individual or entity that offers or provides any two-way communications service, telephone service, telegraph service, paging service, or communications service similar to such services and is certificated as a provider of such services after June 6, 1995, unless otherwise exempted from this definition by state or federal law.

Additionally, Tennessee Code Section 7-59-307(d) explicitly prohibits the regulation of interconnected Voice over Internet Protocol (VoIP) services.

Furthermore, under Section 153(36) of Title 47 of the US Code,¹ the definition of *Non-Interconnected VoIP* is as follows:

- (A) The term “non-interconnected VoIP service” means a service that-
 - (i) enables real-time voice communications that originate from or terminate to the user's location using Internet protocol or any successor protocol; and
 - (ii) requires Internet protocol compatible customer premises equipment; and
- (B) does not include any service that is an interconnected VoIP service.

Network Communications International Corp. (“the Company”) provides inmate calling services that fall within the scope of **non-interconnected VoIP** as defined by applicable regulations. The Company’s VoIP platform does not support the receipt of voice-only calls originating from the public switched telephone network (PSTN). Accordingly, the service does not meet the definition of a “competing telecommunications service provider” under Tennessee law and is therefore outside the regulatory jurisdiction of the Tennessee Public Utility Commission with respect to the rates, terms, and conditions applicable to IP-enabled services.

In light of the above, **Network Communications International Corp. hereby formally withdraws its Operator Services and IXC-Reseller authority in the state of Tennessee**, originally granted on **March 1, 1997**.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3013 or via email to Sharon.Warren@jsitel.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

Enclosures
SW/mp

¹ <https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title47-section153&num=0&edition=prelim#sourcecredit>