



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

VIA ECFS

October 31, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Wireline Competition Bureau

**Re: In the Matter of the Joint Application of Ben Lomand Rural Telephone Cooperative, Inc. and West Kentucky Rural Telephone Cooperative Corporation, Inc. for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer Control of Assets of an Authorized Domestic Section 214 Carrier
WC Docket No. 14-190**

Dear Ms. Dortch:

Pursuant to Staff's request, Ben Lomand Rural Telephone Cooperative, Inc. ("Ben Lomand") and West Kentucky Rural Telephone Cooperative Corporation, Inc. ("WK&T") (collectively, "Applicants") hereby supplement the Application filed in the above-referenced proceeding.

Applicants clarify that streamlined processing is requested pursuant to Section 63.03(b)(2)(ii) of the Commission's rules. Further, Applicants provide the following additional geographic service area and services description.

WK&T is an incumbent local exchange carrier ("LEC") that provides local exchange telephone service and exchange access service to approximately 16,000 access lines in twenty-three (23) exchanges in eight (8) counties in northwest Tennessee and west Kentucky. WK&T serves portions of six (6) counties in Kentucky: Calloway, Carlisle, Graves, Hickman, Marshall and McCracken, and portions of five (5) counties in Tennessee: Dyer, Gibson, Henry, Obion and Weakley. WK&T also provides interexchange service in WK&T's local telephone service area and is the presubscribed long distance provider for approximately 13,000 lines. In addition, WK&T provides high-speed Internet service and advanced video services in its local telephone service area.

Ben Lomand is an incumbent LEC that provides local exchange telephone service and exchange access service in seventeen (17) exchanges in ten (10) counties in central Tennessee. Ben Lomand provides service in Warren, White, Grundy counties, in major

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

portions of Van Buren County, as well as limited portions of Coffee, DeKalb, Bedford, Rutherford, Cannon, and Marion counties in Tennessee. Ben Lomand provides service to approximately 32,000 incumbent local exchange access lines. Ben Lomand, through its wholly-owned subsidiaries, Ben Lomand Communications, LLC (“BLC”) and Volunteer First Services, LLC (“VFS”) also provides competitive LEC service to approximately 8,000 access lines in the cities of Sparta, McMinnville and Crossville, Tennessee. BLC provides long distance services to approximately 30,000 customers in the areas served by Ben Lomand, BLC and VFS as well as to a limited extent in areas served by BellSouth and Frontier Communications Corp. Ben Lomand, through Volunteer Wireless, LLC, provides high-speed and dial-up Internet access to approximately 17,000 Internet customers, of which approximately 13,000 are broadband connections. Ben Lomand, through its subsidiary, Volunteer Wireless, LLC, also provides video and high-definition television to approximately 11,000 video customers. Ben Lomand resells mobile wireless service in the areas in which it provides local exchange service and (through its affiliates) competitive LEC service in central Tennessee.

Synergy Technology Partners, Inc., of which Ardmore Telephone Company, Inc. (“Ardmore”) is a wholly-owned subsidiary does not provide any telecommunications services in any geographic area.

WK&T, Ben Lomand and their affiliates have no overlapping or adjacent service areas. Ardmore, of which WK&T will be 100% indirect owner at the conclusion of the proposed transfer of control, does not have overlapping or adjacent service areas to either of the Applicants or their affiliates. The Commission previously considered the Applicants’ service territories as parties to a previous Domestic Section 214 Assignment and Transfer of Control Application which was granted September 14, 2009.¹

Please direct any questions regarding this Supplement to the undersigned consultant for the Company.

Sincerely,



John Kuykendall
Vice President

Enclosures

cc: Dennis Johnson, Wireline Competition Bureau, via email

¹ *Notice of Non-Streamlined Domestic 214 Application Granted*, WC Docket No. 09-148, Public Notice, DA 09-2046 (rel. Sept. 14, 2009).