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DOCKET FILE COPY ORIGINAL

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Rebecca L. Murphy

Senior Communications Consultants
Kenneth C. Johnson
G. Kent Larsen

March 7, 2003

VIA HAND DELIVERY

Ms. Marlene R. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

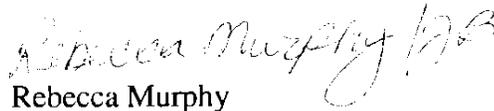
**Re: Advantage Cellular Systems, Inc.
CC Docket No. 96-45
Petition of Advantage Cellular Systems, Inc. to be Designated as an Eligible
Telecommunications Carrier**

Dear Ms. Salas:

On behalf of Advantage Cellular Systems, Inc., enclosed for filing are an original and four (4) copies of the above reference Petition. Also enclosed is a pink copy of the Petition. Please date-stamp and return this copy to my attention.

If you have any questions, please contact us.

Sincerely,


Rebecca Murphy

Enclosures

VED

MAR - 7 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

MAR - 7 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Federal-State Joint Board on)
Universal Service) CC Docket No. 96-45
)
Advantage Cellular Systems, Inc.)
)
Application for Designation as an)
Eligible Telecommunications Carrier)
in the State of Tennessee)

To: Wireline Competition Bureau

**PETITION OF ADVANTAGE CELLULAR SYSTEMS, INC. TO BE
DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Pursuant to Sections 214 and 254 of the Communications Act of 1934, *as amended* (“the Act”), Advantage Cellular Systems, Inc. (“Advantage”), a Commercial Mobile Radio Service (“CMRS”) carrier, by its attorneys, hereby respectfully requests that the Federal Communication Commission (“FCC” or “Commission”) designate Advantage as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(c)(6) of the Act.² Advantage seeks ETC status for the entire study area of Dekalb Telephone Cooperative, Inc. d/b/a DIC Communications (“DTC Communications”), a Tennessee rural telephone company.’ **As** explained below, Advantage meets the requirements of the Act and the FCC should grant Advantage ETC status.

¹ Telecommunications Act of 1996, Pub. L.No. 104-104, 110 Stat. 56 (1996). The 1996 Act amended the Communications Act of 1934, 47 U.S.C. § 151, *et seq.* (“the Act”); *see* 47 U.S.C. §§ 214 & 254.

² 47 U.S.C. § 214(e)(6).

³ 47 U.S.C. § 153(37).

Background

On March 13, 2002, our office sent a letter to the Tennessee Regulatory Authority ("TRA") stating that it is our understanding that TRA does not handle requests from CMRS carriers to be classified as an ETC.⁴ We stated, however, that if our understanding was incorrect and TRA does handle ETC requests, Advantage would file its ETC application with TRA. In response to our letter, TRA staff instructed Advantage to file its ETC application with Sara Kyle, TRA Chairman. Accordingly, Advantage filed its ETC application with TRA on November 18, 2002.⁵ On January 27, 2003, TRA concluded that Advantage "is not subject to TRA authority and therefore cannot be designated as an ETC consistent with Federal Statutes."⁶ Attached is a copy of TRA's Conference Summary noting that it does not have jurisdiction over Advantage.⁷ TRA has clearly indicated that it does not have jurisdiction over Advantage and therefore cannot designate it as an ETC. Accordingly, Advantage hereby requests that the FCC designate Advantage as an ETC pursuant to Section 254(c) of the Act.

Discussion

In support of its Application, Advantage submits the following:

1. Advantage, with principal offices at Highway 70 West, P.O. Box 457, Alexandria, TN 37012, Telephone (615) 464-2355; Fax (615) 529-1030, was granted authority to conduct business in Tennessee by order of the Tennessee Secretary of State dated December 20, 1990. Advantage is an affiliate of DTC Communications. Wayne Gassaway is the General Manager of Advantage and can be contacted at the above address and phone number. Advantage has obtained authority to transact business in the state of Tennessee as set forth in the provisions of the Tennessee Code Annotated, Title 48, Chapter 11, Part 309.

⁴ See attached Exhibit A.

⁵ See attached Exhibit B.

⁶ See attached Exhibit C at page 2

See attached Exhibit C.

2. Section 214(e) of the Act and the FCC's rules' govern whether a telecommunications carrier qualifies as an ETC." Under the Act and the Commission's rules, a state commission, or the FCC where the carrier is not subject to state jurisdiction, has the authority to designate a common carrier as an ETC if it determines that the carrier has met the requirements of section 214(e)(1). Section 214(e)(1) requires that a common carrier meet the following requirements throughout its entire service area to qualify as an ETC: 1) it must offer services supported by Federal universal service support under Section 254(c) using its own facilities or a combination of its own facilities and resale; and 2) it must advertise the availability of such services and charges, using a media of general distribution. If the carrier meets these requirements and the state commission or FCC determines that the grant of ETC status is consistent with the public interest, convenience, and necessity, the carrier will qualify for universal service support. As discussed below, Advantage meets each of the Section 214 requirements.

A. Advantage offers services supported by Federal universal service support under Section 254(c) using its own facilities." Advantage operates a state-of-the-art wireless CMRS network throughout the DTC Communications study area. Advantage offers a variety of calling plans to approximately 10,500 existing customers.

B. Advantage provides telecommunications services supported under Section 254(c) throughout the entire study area of DTC Communications."

C. Advantage plans to advertise the availability and price of its universal service offering which comports with the core the list of universal service requirements throughout the area in which it is designated as an ETC.

⁸ *In re Federal-State Joint Board on Universal Service*, Report and Order, FCC 97-157 at ¶¶ 130-136 (rel. May 8, 1997).

⁹ See 47 U.S.C. § 214(c).

¹⁰ These services are set forth in Section 3

¹¹ See 47 U.S.C. § 254(c).

Advantage will advertise using, at a minimum, publication in four newspapers of general circulation including, *The Smithville Review*, *The Middle Tennessee Times*, *The Cannon Courier*, and *The Carthage Courier*, throughout DTC Communications' entire service area, or by other means as management may direct using good business practices and such guidance as TRA has or may establish.

3. Section 254(c) of the Act and **FCC** Rule Section 54.101¹² establish "core" or designated services that are supported by Federal universal service support mechanisms.¹³ These core services include:
 - A. voice grade access to the public switched network;
 - B. an amount of local usage free of (additional) charge;
 - C. Dual Tone Multi-Frequency signaling or its functional equivalent;
 - D. single party service;
 - E. access to emergency services;
 - F. access to operator services;
 - G. access to interexchange service;
 - H. access to directory assistance; and
 - I. toll limitation services for qualifying low-income consumers on at least one calling plan.

Advantage offers the entire required "core" services listed above

4. Advantage will offer LifeLine and Linkup services to qualifying low-income consumers consistent with Federal and state rules, regulations and guidelines.
5. Advantage has demonstrated its ability to **fulfill** its obligations as set forth in this instant application for certification as an ETC. Advantage respectfully

¹² 47 C.F.R. § 54.101

¹³ See 47 U.S.C. § 254(c)

submits that its request to be designated as an ETC serves the public interest, convenience, and necessity as required by Section 214(e)(6) because it will allow Advantage to ensure that its resources are committed to the provision and preservation of universal service and help Advantage bring the benefits of competition and advanced services to underserved areas.

The FCC has often recognized the competitive advantages that wireless carriers bring to underserved areas when providing universal service. Recently the FCC granted Petitions filed by RCC Holdings (RCC)¹⁴ and Cellular South License, Inc. (Cellular South)¹⁵ to be designated as an ETC. The Commission found that designating these carriers as an ETC would serve the public interest, stating “[a]n important goal of the 1996 Act is to open local telecommunications markets to competition. The Commission has held that designation of qualified ETCs promotes competition and benefits consumers by increasing consumer choice, innovative services, and new technologies.”¹⁶ Designating Advantage as an ETC will allow customers in rural Tennessee to choose service based on pricing, service quality, customer service, and service availability.

Advantage will use its federal high cost support for construction, maintenance and upgrading of facilities serving rural areas for which such support is intended. By designating Advantage as an ETC, the FCC will further the benefits of competition, including increased choices, higher quality service, and lower rates, for consumers in rural Tennessee.

¹⁴ *In re Federal State Joint Board on Universal Service; RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket 96-45 (rel. Nov. 27, 2002) (“RCC MO&O”).

¹⁵ *In re Federal State Joint Board on Universal Service; Cellular South License, Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, Memorandum Opinion and Order, CC Docket 96-45 (rel. Dec. 4, 2002).

¹⁶ RCC MO&O at ¶ 23.

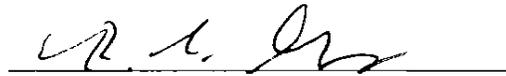
As stated above, the FCC has recently granted petitions filed by RCC and Cellular South to be designated as an ETC throughout their licensed service areas in Alabama. Advantage requests that, pursuant to Commission precedent, the Commission should grant Advantage ETC status and allow it to qualify for high-cost universal service support.

Conclusion

Because Advantage meets the requirements of Sections 254 and 214 of the Act, as well as the Commission's Rules implementing the Act, and Advantage's ETC application is consistent with the public interest, convenience, and necessity, the FCC should grant Advantage ETC status and allow it to qualify for universal service support within the requested service area. Advantage also submits that an expedited grant of this application is in the public interest, convenience, and necessity and consistent with Sections 214 and 254 of the Act.

Respectfully submitted,

ADVANTAGE CELLULAR SYSTEMS, INC.



Caressa D. Bennet
Rebecca L. Murphy
Bennet & Bennet, PLLC
1000 Vermont Avenue, NW
Tenth Floor
Washington, DC 20005
202-371-1500

Its Attorneys

March 6, 2003

DECLARATION OF WAYNE CASSAWAY

- I. Wayne Gassaway, do hereby declare under penalty of perjury the following:
 1. I am the General Manager of Advantage Cellular Systems, Inc (“Advantage”).
 2. Advantage is a small cellular carrier providing service in rural Tennessee (Cannon, Tennessee KSA 2, CMA644).
 3. As a carrier not subject to state commission jurisdiction in the State of Tennessee, Advantage is seeking designation as an ETC under Section 214(e)(6).
 4. Advantage meets the criteria for ETC designation as explained herein.
 5. Advantage is a “common carrier” for purposes of obtaining ETC designation pursuant to 47 U.S.C. §214(e)(1). A “common carrier” is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission’s Rules provides that cellular service is a common carrier service.
 6. Advantage currently offers and is able to provide, within its designated service areas, the services and functionalities identified in 47 C.F.R. §54.101(a), including:
 - a. Voice-grade access to the public switched telephone network;
 - b. Local usage;
 - c. Dual-tone, multi-frequency signaling, or its functional equivalent;
 - d. Single-party service or its functional equivalent;
 - e. Access to emergency services;
 - f. Access to operator services;
 - g. Access to interexchange service;
 - h. Access to directory assistance; and
 - i. Toll limitation for qualifying low-income consumers.

7. I have read **the** foregoing “Application of Advantage Cellular Systems, Inc. to be Designated **as an** Eligible Telecommunications Carrier.” I have personal **knowledge** of the facts set forth therein, and believe them to be true **and** correct. In accordance with FCC Rules **Sections 54.313 and 54.314**, **all high-**cost support provided to Advantage will be used only for **the** provision, maintenance and upgrading of facilities and services for which the support is intended pursuant to Section 254(e) of the Telecommunications **Act** of 1996.



Wayne Gassaway

3-7-03

Date

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March 13, 2002

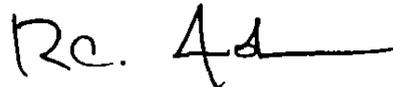
Richard Collier, Chief Counsel
Legal Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Collier:

It is our understanding that ~~the~~ Tennessee Regulatory Authority (TRA) **does** not handle requests from commercial mobile radio service (CMRS)' carriers to be classified **as** an eligible telecommunications carrier (ETC)² for purposes of collecting universal service. If TRA does not handle ETC requests, Advantage Cellular Systems, **Inc.** (Advantage) will file its ETC request with the Federal Communications Commission (FCC). Could you please confirm in **a** letter whether Advantage should file its ETC request with ~~the~~ FCC or **TRA**.

If, in fact, TRA handles ETC request, could you please advise **us** of the proper procedures to **make** such a request. **Thanks** for your quick consideration and please contact me if you have any questions.

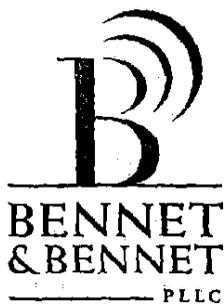
Sincerely,



Ken Johnson

¹ Regulated pursuant to 47 U.S.C. § 332(c)(1).

² See 47 U.S.C. § 214(e)(1) & (2).



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Kelvin L. Reaves
Rebecca L. Murphy

Senior Communications Consultants
Kenneth C. Johnson
G. Kent Larson

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TN REGULATORY AUTHORITY
TERRACE ROAD

November 18, 2002

VIA OVERNIGHT MALL

Sara Kyle, **Chairman**
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

DOCKETNO.

02-01245

Dear Ms. Kyle:

Enclosed for the Tennessee Regulatory Authority's (TRA) review is one (1) original and thirteen (13) copies of Advantage Cellular Systems, Inc.'s (Advantage) Application to be Designated as an Eligible Telecommunications Carrier (ETC). Also enclosed is a pink copy of Advantage's Application. Please date-stamp and return this pink copy in the enclosed self-addressed, stamped envelope for our records.

Thanks for your quick consideration and please contact me if you have any questions.

Sincerely,

Rebecca L. Murphy

Enclosures

RECEIVED

NOV 19 2002

SARA KYLE, COMMISSIONER
TN PUBLIC SERVICE COMM.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN THE MATTER OF THE)
APPLICATION OF ADVANTAGE)
CELLULAR SYSTEMS, INC. FOR)
ELIGIBLE TELECOMMUNICATIONS)
CARRIER STATUS IN TENNESSEE)

Docket No. 02-01245

APPLICATION OF ADVANTAGE CELLULAR SYSTEMS, INC. TO BE
DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to Sections 214 and 254 of the Communications Act of 1934, **as amended** ("the Act"), on behalf of Advantage Cellular Systems, Inc. ("Advantage"), a Commercial Mobile Radio Service ("CMRS") carrier, it attorneys hereby respectfully request that the Tennessee Regulatory Authority ("TRA") designate Advantage **as an** Eligible Telecommunications Carrier ("**ETC**") pursuant to Section 254(c) of the Act? Advantage seeks ETC status for the entire study **area** of Dekalb Telephone Cooperative, Inc. d/b/a DTC Communications ("DTC Communications"), a Tennessee **rural** telephone company. **As** explained below, Advantage meets the requirements of the Act and the TRA should **grant** Advantage ETC status.

In **support** of its Application, Advantage submits the following:

1. Advantage Cellular Systems, Inc. with principal offices at Highway 70 West, P.O. **Box** 457, Alexandria, TN 37012, Telephone (615) **464-2355**; Fax (615) 529-1030, **was** granted authority to conduct business in Tennessee by order of the Tennessee Secretary of State dated December **20**, 1990. Advantage is an affiliate of DTC Communications. Wayne Gassaway is the General Manager of Advantage and can be contacted at the above address **and** phone number, Advantage **has** obtained authority to transact business in the state of

¹ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996). The 1996 Act amended the Communications Act of 1934, 47 U.S.C. § 151, et seq. ("the Act"); see 47 U.S.C. §§ 214 & 254.
¹ 47 U.S.C. § 254.

Tennessee permitted as set forth in the provisions of the Tennessee Code Annotated, Title 48, Chapter 11, Part 309.

2. Pursuant to the Federal Communications Commission's ("FCC") *Report and Order*,¹ Section 214(e) of the Act governs whether a telecommunications carrier qualifies **as** an ETC.⁴ Under this section, a state commission has the authority to designate a common carrier **as** an ETC if it **determines** that the carrier has met the requirements of section 214(e)(1). Section 214(e)(1) requires that a common carrier meet the following requirements throughout its entire service area to qualify **as** an ETC: 1) it must offer services supported by Federal universal service support under Section 254(c) using its own facilities or a combination of its own facilities and resale; and 2) it must advertise the availability of such services and charges, using a media of general **distribution**. If the carrier meets these requirements and the state commission determines that the grant of ETC status is consistent with the public interest, convenience, and necessity, the carrier will **qualify** for universal service support. As discussed below, Advantage meets each of **the Section 214** requirements.

A. Advantage offers services supported by Federal universal service support under Section 254(c) using its own facilities? Advantage operates a state-of-the-art wireless CMRS network throughout the DTC Communications study area. Advantage offers a variety of calling **plans** to approximately 10,500 existing customers.

B. Advantage provides telecommunications services **supported under** Section 254(c) throughout the entire study area of DTC **Communications**.⁶

¹In re *Federal-State Joint Board on Universal Service*, Report and Order, FCC 97-157 at ¶¶ 130-136 (rel. May 8, 1997).

⁴See 47 U.S.C. § 214(e).

⁵These services are set forth in Section 3.

⁶See 47 U.S.C. § 254(c).

C. Advantage plans to advertise the availability and price of the list of universal services pursuant to Section 254(c) throughout the area in which it **is** designated as an ETC. Advantage will advertise using, at a minimum, publication in **four** newspapers of general circulation including, *The Smithville Review*, *The Middle Tennessee Times*, *The Cannon Courier*, and *The Carthage Courier*, throughout Advantage's entire service area, or by other means **as** management may direct **using** good business practices **and** such guidance **as** the **TRA** has or may establish.

3. Section 254(c) of the Act and FCC Rule ~~Section 54.101~~⁷ establish "core" or designated services that are supported by Federal universal service support mechanisms.' These core services include:

- A. voice grade access to the public switched network;
- B. **an** amount of local usage **free** of (additional) charge;
- C. Dual Tone Multi-Frequency signaling or its functional equivalent;
- D. single party service;
- E. access to emergency services;
- F. access to operator services;
- G. access to interexchange service;
- H. access to directory assistance; **and**
- I. toll limitation services for qualifying low-income consumers on at least one calling plan.

Advantage offers the entire required "core" services listed above.

4. Advantage will offer LifeLine **and** LinkUp services to **qualifying** low-income consumers consistent **with** Federal **and** state rules, regulations **and** guidelines.

⁷ 47 C.F.R. § 54.101

⁸ See 47 U.S.C. § 254(c).

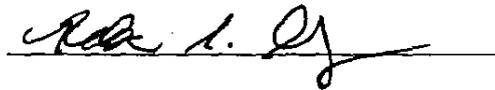
5. Advantage has demonstrated its ability to fulfill its obligations **as** set forth in this instant application for certification as an ETC. Advantage respectfully submits that its request to be designated as **an** ETC serves the public interest, convenience, and necessity because it will allow Advantage to ensure that its resources **are** committed to the provision and preservation of universal service.

Because Advantage meets these requirements and it **is** consistent with the public interest, convenience, and necessity, the TRA should grant Advantage ETC status and **allow** it to **qualify** for universal service support. For the foregoing **reasons**, Advantage respectfully requests that the TRA designate **it as an** ETC within its respective service area. Advantage also submits that **an** expedited grant of this application is in the public interest, convenience, and necessity and consistent with Sections 214 and **254** of the Act.

Respectfully submitted,

ADVANTAGE CELLULAR SYSTEMS, INC.

By:



Caressa D. Bennet
Rebecca L. Murphy
Bennet & Bennet, PLLC
1000 Vermont Avenue, NW
Tenth Floor
Washington, DC 20005
202-371-1500

Its Attorneys

November 18, 2002

CERTIFICATE OF SERVICE

I, Joy Barksdale, hereby certify that a copy of the foregoing **Application of** Advantage Cellular Systems, Inc. to be Designated **as an** Eligible Telecommunications Carrier **was** served on November 18, 2002, by first-class United States **mail**, postage prepaid, on the company listed below:

Dekalb Telephone Cooperative, Inc.
d/b/a DTC Communications
P.O.Box 247
111 High Street
Alexandria, TN 37012-0247

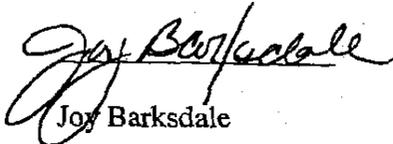

Joy Barksdale

Exhibit C

TENNESSEE REGULATORY AUTHORITY



The following is a summary of the actions taken **by** the Tennessee Regulatory Authority at the January **27,2003**, conference:

Miscellaneous Business

1. **CSA Rulemaking** Oral arguments were presented today by parties in the TRA's CSA Rulemaking proceeding. Among those presenting arguments were: the Southeastern Competitive Carriers Association (SECCA); Time-Warner; BellSouth; Sprint-United; the Consumer Advocate Division (CAD); and Citizens Telecommunications. **At** the conclusion of the oral arguments, a motion was made to establish a procedural schedule to allow the Consumer Advocate Division the opportunity to file a brief outlining the CAD's positions, to which the remaining parties are to respond by 2/18/03.

2. **Internal Procedures for Filing Comments with Federal Agencies Pursuant to the Open Meetings Act**, the panel addressed a motion Director Jones introduced during the January 6, 2003, conference agenda regarding the TRA's internal procedures for filing comments with Federal agencies. The panel decided to incorporate the comments of Directors Kyle, Tate and Miller and develop a process by which to satisfy the requirements of the Open Meetings Act.

3. **TRA Telephone Service Standard Rules – White Page Directories** A Motion was made to draft a proposed rule reflecting the Tennessee Supreme Court's 2002 decision and to subsequently allow parties to respond to the proposed rule. The Tennessee Supreme Court in 2002 affirmed the TRA's ruling that competitors of BellSouth should be included on the cover of and in the White page listings of BellSouth telephone directories. The case is now on appeal with the United States Supreme Court.

Telecommunications Dockets:

*Accepted, in-pan, the complaint of Ben Lomand Communications against Citizens Communications Company of Tennessee, d/b/a Frontier Communications of Tennessee, and voted to convene a contested case to address the matter alleging predatory pricing and anti-competitive behavior (Docket 02-01221).

*Application of Advantage Cellular Systems, Inc. to be designated as an Eligible Telecommunications Carrier (ETC), the panel denied the application on the grounds that the applicant is not subject to TRA authority and therefore cannot be designated as an ETC consistent with Federal statutes (Docket 02-01245).

*In the docket to establish “Generally Available Terms and Conditions” for Interconnection, the panel voted 2-1, with Director Jones casting the no vote. Jones cast the no vote on the grounds that the provisions in the “SGAT” (Statement of Generally Available Terms) may be inconsistent with previous TRA decisions (Docket 01-00526).

*Approved the petition of Condo Villas of Gatlinburg d/b/a Foothills Water Property, Inc. to amend its CCN (Docket 02-00986).

*BellSouth’s complaint to enforce an interconnection agreement between BellSouth and DeltaCom Communications Inc and request for expedited hearing – the panel voted to accept the complaint of BellSouth and proceed with a hearing and ordered the parties to file discovery briefs. The panel also appointed General Counsel or his designee to serve as Hearing Officer in case (Docket 02-01203).

*Small Telephone Companies Tariff filings regarding reclassification of pay telephone service as required by FCC Docket 96-128: Director Jones moved that the TRA find that § 276(b)(1)(B) applies to the non-BOC payphone service providers and the TRA advance with the docket to determine whether additional action is necessary to ensure compliance with § 276(b)(1)(B). Director Kyle moved that General Counsel or his designee Serve as the Pre-Hearing officer (Docket 97-01181).

*Petition of Momentum Business Solutions, Inc. for emergency relief. At the request of Momentum, the Directors voted to leave the complaint open to allow the parties to resolve their disputes (Docket 03-00038).

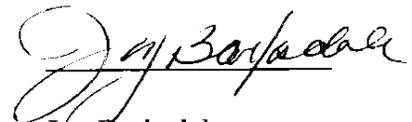
*Approved 47 Contract Service Arrangements (CSAs). The CSAs were allowed to go into effect pending the outcome of a rulemaking proceeding and conditioned upon BellSouth disclosing customers’ identities. (Various dockets).

For more information about today’s TRA conference, please contact the office of the Chairman at 615-741-3125.

CERTIFICATE OF SERVICE

I, Joy Barksdale, hereby certify that a copy of the foregoing Application of Advantage Cellular Systems, Inc. to be Designated as an Eligible Telecommunications Carrier was served on March 7, 2003, by first-class United States mail, postage prepaid, on the company listed below:

Dekalb Telephone Cooperative, Inc.
d/b/a DTC Communications
P.O. Box 247
111 High Street
Alexandria, TN 37012-0247



Joy Barksdale