

**Exhibit A**  
**Letter to TRA**

Law Offices of  
***Bennet & Bennet, PLLC***  
1000 Vermont Avenue, N.W., 10th Floor  
Washington, D.C. 20005

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*Tel: (202) 371-1500*

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*e-mail: [mail@bennetlaw.com](mailto:mail@bennetlaw.com)*

*<http://www.bennetlaw.com>*

March 13, 2002

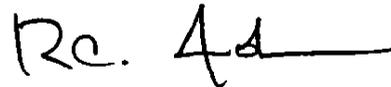
Richard Collier, Chief Counsel  
Legal Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Dear Mr. Collier:

It is our understanding that the Tennessee Regulatory Authority (TRA) does not handle requests from commercial mobile radio service (CMRS)<sup>1</sup> carriers to be classified as an eligible telecommunications carrier (ETC)<sup>2</sup> 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

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<sup>1</sup> Regulated pursuant to 47 U.S.C. § 332(c)(1).

<sup>2</sup> See 47 U.S.C. § 214(e)(1) & (2).

**Exhibit B**  
**TRA ETC Application**



Law Offices of  
Bennet & Bennet, PLLC

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Marjorie G. Spivak  
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Donald L. Herman, Jr.  
Kelvin L. Reaves  
Rebecca L. Murphy

Senior Communications Consultants  
Kenneth C. Johnson  
G. Kent Larsen

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02 NOV 21 AM 8 37

TN REGULATORY AUTHORITY  
DOCKET ROOM

November 18, 2002

VIA OVERNIGHT MAIL

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

DOCKET NO.

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. OR-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*<sup>1</sup> ("the Act"), on behalf of Advantage Cellular Systems, Inc. ("Advantage"), a Commercial Mobile Radio Service ("CMRS") carrier, its 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.<sup>2</sup> 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

<sup>1</sup> 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.

<sup>2</sup> 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*,<sup>3</sup> Section 214(e) of the Act governs whether a telecommunications carrier qualifies as an ETC.<sup>4</sup> 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.<sup>5</sup> 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.<sup>6</sup>

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<sup>3</sup> *In re Federal-State Joint Board on Universal Service*, Report and Order, FCC 97-157 at ¶¶ 130-136 (rel. May 8, 1997).

<sup>4</sup> See 47 U.S.C. § 214(e).

<sup>5</sup> These services are set forth in Section 3.

<sup>6</sup> See 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<sup>7</sup> establish "core" or designated services that are supported by Federal universal service support mechanisms.<sup>8</sup> 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.

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<sup>7</sup> 47 C.F.R. § 54.101

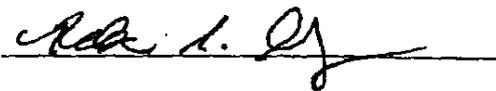
<sup>8</sup> See 47 U.S.C. § 254(c).

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

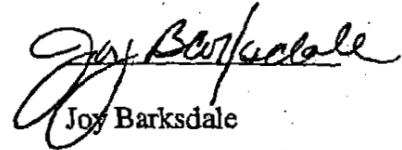
Its Attorneys

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**  
**TRA Conference Summary**

# 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-part, 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.

**Exhibit D**  
**TRA Final Order**

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 11, 2003

IN RE: )  
 )  
APPLICATION OF ADVANTAGE CELLULAR ) DOCKET NO.  
SYSTEMS, INC. TO BE DESIGNATED AS AN ) 02-01245  
ELIGIBLE TELECOMMUNICATIONS CARRIER )

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ORDER

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This matter came before Chairman Sara Kyle, Director Deborah Taylor Tate and Director Pat Miller of the Tennessee Regulatory Authority (the "Authority"), the voting panel assigned in this docket, at the regularly scheduled Authority Conference held on January 27, 2003, for consideration of the *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier* ("Application") filed on November 21, 2002.

**Background**

Advantage Cellular Systems, Inc. ("Advantage") is a commercial mobile radio service provider ("CMRS") seeking designation as an Eligible Telecommunications Carrier ("ETC") by the Authority pursuant to 47 U.S.C. §§ 214 and 254. In its *Application*, Advantage asserts that it seeks ETC status for the entire study area of Dekalb Telephone Cooperative, Inc., a rural cooperative telephone company. Advantage maintains that it meets all the necessary requirements for ETC status and therefore is eligible to receive universal service support throughout its service area.

**The January 27, 2003 Authority Conference**

During the regularly scheduled Authority Conference on January 27, 2003, the panel of Directors assigned to this docket deliberated Advantage's *Application*. Of foremost consideration was the issue of the Authority's jurisdiction. The panel unanimously found that the Authority lacked

jurisdiction over Advantage for ETC designation purposes.<sup>1</sup>

This conclusion was implicitly premised on Tenn. Code Ann. § 65-4-104, which provides that:

The Authority has general supervisory and regulatory power, jurisdiction and control over all public utilities and also over their property, property rights, facilities, and franchises, so far as may be necessary for the purpose of carrying out the provisions of this chapter.

For purposes of Tenn. Code Ann. § 65-4-104, the definition of public utilities specifically excludes, with certain exceptions not relevant to this case, “[a]ny individual, partnership, copartnership, association, corporation or joint stock company offering domestic public cellular radio telephone service authorized by the federal communications commission.”

The Authority’s lack of jurisdiction over CMRS providers implicates 47 U.S.C. § 214(e), which addresses the provision of universal service. Where common carriers seeking universal service support are not subject to a state regulatory commission’s jurisdiction, 47 U.S.C. § 214(e)(6) authorizes the Federal Communications Commission (“FCC”) to perform the ETC designation.<sup>2</sup>

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<sup>1</sup> This finding is not inconsistent with the Authority’s decision in *In re: Universal Service Generic Contested Case*, Docket 97-00888, *Interim Order on Phase I of Universal Service*, pp. 53-57 (May 20, 1998), in which the Authority required intrastate telecommunications carriers to contribute to the intrastate Universal Service Fund including telecommunications carriers not subject to authority of the TRA. The decision in Docket No. 97-00888 was based primarily on 47 U.S.C. § 254(f) which authorizes states to adopt regulations not inconsistent with the Federal Communications Commission’s rules on Universal Service and specifically requires every telecommunications carrier that provides intrastate telecommunications services to contribute to the preservation and advancement of universal service in that state. The *Interim Order* was issued prior to the effective date of 47 U.S.C. § 214(e)(6).

<sup>2</sup> 47 U.S.C. § 214(e)(6) states:

(6) Common carriers not subject to state commission jurisdiction

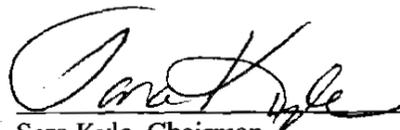
In the case of a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission, the Commission shall upon request designate such a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the Commission consistent with applicable Federal and State law. Upon request and consistent with the public interest, convenience and necessity, the Commission may, with respect to an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated under this paragraph, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the Commission shall find that the designation is in the public interest.

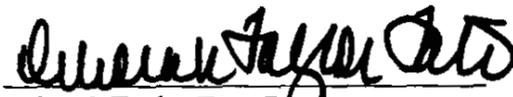
As a matter of “state-federal comity,” the FCC requires that carriers seeking ETC designation “first consult with the state commission to give the state commission an opportunity to interpret state law.”<sup>3</sup> Most carriers that are not subject to a state regulatory commission’s jurisdiction seeking ETC designation must provide the FCC “with an affirmative statement from a court of competent jurisdiction or the state commission that it lacks jurisdiction to perform the designation.”<sup>4</sup>

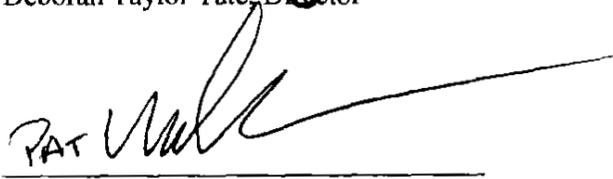
The panel noted that the FCC is the appropriate forum for Advantage to pursue ETC status pursuant to 47 U.S.C. § 214(e)(6). This Order shall serve as the above mentioned affirmative statement required by the FCC.

**IT IS THEREFORE ORDERED THAT:**

The *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier* is dismissed for lack of subject matter jurisdiction.

  
Sara Kyle, Chairman

  
Deborah Taylor Tate, Director

  
Pat Miller, Director

<sup>3</sup> *In the Matter of Federal-State Joint Bd. on Universal Service*, CC Docket No. 96-45, *Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, 15 F.C.C.R. 12208, 12264, ¶ 113 (June 30, 2000).

<sup>4</sup> *See id.* (The “affirmative statement of the state commission may consist of any duly authorized letter, comment, or state commission order indicating that it lacks jurisdiction to perform designations over a particular carrier.”)

**Docket Number 02-01245**

(all filings are in Adobe PDF format)  
*Telecommunications -- Other*

**Open****Kyle, Miller, Tate**

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

<b>Date Filed</b>	<b>Title of Document</b>	<b>Company F</b>
Issued: 11/21/02	Application.	Advantage Cell Systems, Inc.
Issued: 04/11/03	Order.	Tennessee Reg Authority

Use your BACK button to return to the previous page

**Exhibit E**  
**Declaration of Wayne Gassaway**  
**Supported Services**

**Declaration of Wayne Gassaway  
Supported Services**

I, Wayne Gassaway, do hereby declare under penalty of perjury as follows:

1. I am the authorized representative for Advantage Cellular Systems, Inc. (“Advantage”) in charge of Advantage’s Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee (“Application”). This affidavit is filed in support of the Application.
2. Advantage is the B block licensee providing cellular service in rural Tennessee (Canon, Tennessee RSA 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 requirements 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). 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 licensed service area the services and functionalities identified in 47 CFR § 54.101(a) as more fully described below:
  - a. Voice-grade Access to the Public Switched Telephone Network. Advantage meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with Bell South, Ben Lomand, DTC Communications, Frontier Communications, and other local exchange carriers (“LECs”), all of Advantage’s customers are able to make and receive calls on the public switched telephone network within the specified bandwidth.
  - b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. The FCC has not yet quantified a minimum amount of local usage required to be included in a universal service offering, but has initiated a separate proceeding to address this issue. Advantage will meet the local usage requirements by including a variety of local usage plans as part of a universal service offering. Advantage’s service includes local usage that allows customers to originate and terminate calls within its local calling area without incurring toll charges.

- c. Dual-Tone, Multi-Frequency ("DTMF") Signaling, or its Functional Equivalent. Advantage currently uses out-of-band digital signaling and in-band multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling.
- d. Single-Party Service or its Functional Equivalent. "Single-party service" means that only one party will be served by a subscriber loop or access line as opposed to a multi-party line. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user's particular transmission. Advantage meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. Access to Emergency Services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Advantage is currently providing Phase I Enhanced 911 service in accordance with the Commission's rules. Phase II Enhanced 911 ("E911"), which is required of certain CMRS carriers, includes the capability of providing both automatic numbering information ("ANI") and automatic location information ("ALI"). Advantage has implemented Phase I and currently provides all of its customers with access to emergency service by dialing 911. Further, Advantage has implemented a network-based Phase II system in its service area and is testing it with its local public safety answering point ("PSAP"). Advantage's Phase II application meets the FCC's Phase II accuracy standards and will provide Advantage's universal service customers with the added benefit of location-based safety.
- f. Access to Operator Services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. Advantage meets this requirement by providing all of its customers with access to operator services provided by DTC Communications.
- g. Access to Interexchange Service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Advantage currently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements Advantage has with several IXC's.
- h. Access to Directory Assistance. The ability to place a call to directory assistance is a required service offering. Advantage meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212."

- i. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. Once designated as an ETC, Advantage will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. Advantage provides toll blocking services for international calls and customer selected toll calls.
7. Advantage will offer supported services using a combination of its own facilities and the resale of other carriers' services.
8. Advantage will advertise the availability of the supported services.
9. I declare under penalty of perjury that the foregoing is true and correct. Executed on 4-21, 2003.



Wayne Gassaway  
Its Authorized Representative

**Exhibit F**  
**Local Calling Plans**

SA NO	Rate Plan	Old NO	Monthly Access	Overage	Free Min	Old Fm NO	Fm Talk
LNA1	ADV SVR	002	\$12.50	\$.55	0	302	\$15.00
LNM1	DEALER PLN	008	\$0	\$.40	240		
LNA2	EMP SAV	010	\$6.25	\$.55	90	310	\$15.00
LNA3	STD EMP	011	\$15.00	\$.30	90	311	\$15.00
LNA4	DIRECTORS	012	\$0.00	\$.55	150	312	\$15.00
LNA5	DTC OFF STA	013	\$55.00	\$.40	130		
LNA6	ACS OFF STA	014	\$0				
LNA7	RADIO	015	\$0.00	\$.55	130		
LNA8	LOCAL SCH	020	\$3.00	\$.25	0		
LNA9	DISPATCH	025	\$15.00	\$.15	0		
LNB1	PREPAID	050	\$0.00				
LNM4	CORP 2 SW	209	\$18.95	\$.24	30	509	\$15.00
LNM3	TN SAVER SW	212	\$29.95	\$.30	110	512	\$15.00
LNB2	TN CORP ONE	217	\$17.95	\$.20	125	517	\$15.00
LNB3	TN CORP TWO	218	\$9.95	\$.20	125		
LNB4	CORP 65	219	\$18.95	\$.24	65		
LNM2 *	EMP 400 1000	221	\$25.00	\$.20	400	521	\$10.00
LNO7 *	EMP 650 1000	222	\$40.00	\$.20	650	522	\$10.00
LNO8 *	EMP 900 1000	223	\$59.00	\$.20	900	523	\$10.00
LNO9 *	EMP 1100 1000	224	\$75.00	\$.20	1100	524	\$10.00
LNB5	FLAT 995	230	\$9.95	\$.35	0		
LNB6	EMP SW	240	\$9.95	\$.20	125	540	\$10.00
LNB7	EMP SW	243	\$19.95	\$.20	250	543	\$10.00
LNB8	DIRECTOR SW	245	\$0.00	\$.35	250	545	\$10.00
LNB9	DEALER SW	258	\$0.00	\$.25	150		
LNC1	ANALOG 150	275	\$25.00	\$.25	125	575	\$15.00
LND3	CORP 250	332	\$24.95	\$.20	250	532	\$15.00
LND4	CORP 400	333	\$29.95	\$.20	400	533	\$15.00
LND5	CORP 600	334	\$37.95	\$.20	600	534	\$15.00
LND6	CORP 900	335	\$49.95	\$.20	900	535	\$15.00
LND7	CORP 1200	336	\$69.95	\$.20	1200		
LNJ6	CORP 125 W/NW		\$22.90	\$.20	125		\$15.00
LNJ7	CORP 250 W/NW		\$29.90	\$.20	250		\$15.00
LNJ8	CORP 400 W/NW		\$34.90		400		\$15.00
LNJ9	CORP 600 W/NW		\$42.90		600		\$15.00
LNG1	CORP 900 W/NW		\$54.90		900		\$15.00
LNG2	CORP 1100 W/NW		\$74.90		1100		\$15.00
LNG4	DIGITAL 30	610	\$18.95	\$.39	30	710	\$15.00
LNG5	DIGITAL 250	615	\$35.00	\$.25	400	715	\$15.00
LNG6	DIGITAL 400	620	\$50.00	\$.25	650	720	\$15.00
LNG7	DIGITAL 700	623	\$50.00	\$.25	700		
LNG8	DIGITAL 600	625	\$69.00	\$.25	900	725	\$15.00

SA NO	Rate PLAN	Old NO	Monthly Access	Overage	Free Min	Old Fm NO	Fm Talk
ENG9	DIGITAL 800	630	\$85.00	\$.25	1100	730	\$15.00
LNH2	DIGITAL 1000	635	\$99.00	\$.25	1400	735	\$15.00
LNH1	DIGITAL 1800	633	\$125.00	\$.25	1800	733	\$15.00
LNH3	DIGITAL 2000	637	\$140.00	\$.25	2000	737	\$15.00
LNH4	DIGITAL 1400 SW	640	\$149.00	\$.25	1400	740	\$15.00
LNH5	DIGITAL 3000 SW	645	\$300.00	\$.20	3000	745	\$25.00
LNH6	400 W/2000	650	\$35.00	\$.35	400	750	\$15.00
LNH7	650 W/2000	655	\$50.00	\$.35	650	755	\$15.00
LNH8	900 W/2000	660	\$69.00	\$.35	900	760	\$15.00
LNH9	1100 W/2000	665	\$85.00	\$.35	1100	765	\$15.00
LNI1	1400 W/2000	670	\$99.00	\$.35	1400	770	\$15.00
LNK8	2200 W/2000	775	\$150.00	\$.25			
LNJ1 *	600 NW W/3000 NT/WK		\$39.95	\$.35	600		\$15.00
LNJ2 *	900 NW W/3000 NT/WK		\$49.95	\$.35	900		\$15.00
LNJ3 *	1200 NW W/3000 NT/WK		\$59.95	\$.35	1200		\$15.00
LNJ4 *	1500 NW W/3000 NT/WK		\$79.95	\$.35	1500		\$15.00
LNJ5 *	1800 NW W/3000 NT/WK		104.95	\$.35	1800		\$15.00
LNI2*	400 W/3000	671	\$35.00	\$.35	400	771	\$15.00
LNI3*	650 W/3000	672	\$50.00	\$.35	650	772	\$15.00
LNI4*	900 W/3000	673	\$69.00	\$.35	900	773	\$15.00
LNI5*	1100 W/3000	674	\$85.00	\$.35	1100	774	\$15.00
LNI6*	1400 W/3000	676	\$99.00	\$.35	1400	776	\$15.00
LNL1	Nation 100	990	\$50.00	\$.35			
LNL2	Nation 1500	995	\$150.00	\$.25			
LNL3	Nation 1100	997	\$125.00	\$.25			
LNL4	Nation 675	998	\$99.00	\$.25			
LNL5	Nation 1000	999	\$120.00	\$.25			

Nights/Weekends are built into the rate plan and share across the account.

### ZONE

LNL6	1001	ZONE 1	\$29.95
LNL7	1002	ZONE 2	\$29.95
LNL8	1003	ZONE 3	\$29.95