

08-48

**CITIZENS NATIONAL
BANK**

Received & Inspected

MAR 27 2008

FCC Mail Room

March 25, 2008

Federal Communications Commission
Wireline Competition Bureau
Competition Policy Division
445 12th Street, SW
Washington, DC 20554

Re: Section 63.71 – Application of CTI/Starvox Communications Inc.

Dear Sir or Madam:

On March 24, 2008, Citizens National Bank ("CNB") received a notice of discontinuance of service (the "Notice") from Capital Telecommunications, Inc. ("CTI"). Although not received by CNB until March 24, 2008, the Notice was dated March 17, 2008 and states that CTI and Starvox Communications ("Starvox") (collectively "CTI/Starvox") intends to discontinue telecommunications services to CNB "thirty (30) days after the date of this letter, or as soon thereafter as the necessary regulatory approvals are obtained." A copy of the Notice is enclosed herewith.

By this letter, CNB is writing to object to the request of CTI/Starvox to discontinue telecommunications services to CNB. By way of background, CNB is a nationally chartered banking association with its home office in Henderson, Texas. CNB has nineteen offices in sixteen cities in East Texas. CNB has over 280 employees and serves in excess of 50,000 banking customers. By federal law, CNB is required to be open for banking business a specified number of hours per banking day.

CNB's banking business is completely dependent on the telecommunications links it uses to process banking transactions initiated through its branch offices. Here are a few examples of the crucial telecommunications services CNB uses which are currently provided by CTI/Starvox: CNB's customers rely on telephone services, including CNB's 800 number, to contact CNB on a daily basis. CNB also processes checks drawn on or deposits made to accounts via CTI/Starvox data links between its offices. CNB also provides automated teller (ATM) machines for its customers to make deposits and withdrawals and the ATM machines are linked to CNB's home office via data links provided by CTI/Starvox. Many CNB customers also use debit cards to pay for purchases and such transactions are conducted via data links provided by CTI/Starvox. Many CNB customers pay bills for utility services, mortgage payments and other services by periodic

Federal Communications Commission

March 25, 2008

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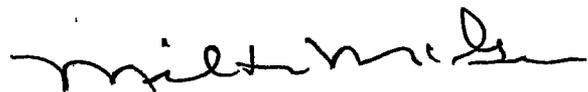
electronic funds transfers from their checking accounts at CNB. CNB also uses data links to transmit net deposit and loan positions to settle its books at the end of each banking day. CNB also uses the CTI/Starvox lines to make periodic financial reports to banking regulators.

Prior to receiving the Notice, CNB began the process of locating replacement service provider(s) to replace CTI/Starvox for its local and long distance telephone services and data lines for all of its offices. Although CNB had made significant progress in this endeavor, it will not be possible for CNB to have its services switched over by the threatened cutoff date of April 16, 2008. In fact, CNB has been advised by its new vendors that the services will not be transferred and operational until at least May 15, 2008, assuming no unforeseen delays. If CTI/Starvox terminates its services to CNB prior to the transfer, CNB will not be able to conduct banking business and CNB and its customers will be adversely affected. Of course, in addition to any harm caused to CNB's customers, any loss of service may impair public confidence in the banking system. Accordingly, CNB objects to the Section 63.71 Application of CTI/Starvox and requests that the Commission deny the application for the reason that CNB (and presumably other CTI/Starvox customers) cannot obtain replacement service within the unreasonably short notice period given by CTI/Starvox and that the needs and convenience of the public and CNB will be adversely affected.

We would also appreciate receiving an acknowledgement from the Commission of receipt of this objection letter and being placed on any mailing or service lists relating to this matter.

Thank you for your attention to this matter.

Yours very truly,



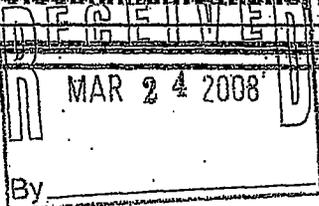
Milton McGee
President and CEO

cc: CTI/Starvox Communications, Inc.
200 West Market Street
York, PA 17401

Marshall W. Mitchell
Field Manager
Office of the Comptroller of the Currency
1800 W. Loop 281, Suite 306
Longview, TX 75604



Capital Telecommunications, Inc.



Voice. Data. Internet. Wireless.

March 17, 2008

CNB - JEFFERSON
ATTN: ACCOUNTS PAYABLE
P.O. BOX 1009
HENDERSON, TX 75653

IMPORTANT NOTIFICATION – UPDATE - *Your action is required!* You must subscribe to a telephone service provider other than CTI/Starvox prior to the end of the thirty (30) day period from the date above or you will not have access to the services currently available to you through CTI/Starvox.

Dear Valued Customer:

Last month, we notified you that CTI and Starvox Communications (“CTI/Starvox”) had entered into an agreement to transfer CTI/Starvox customers to bComm, Inc. (“bComm”). We also noted that we would update you with any development or details regarding the discontinuance of your service by CTI/Starvox. The purpose of this letter is to inform you that the agreement with bComm will not be consummated. Instead, if you haven’t already, you will need to find a new service provider for your local or long distance, internet or data communications needs.

Effective thirty (30) days after the date of this letter, or as soon thereafter as the necessary regulatory approvals are obtained, CTI/Starvox will be discontinuing your telecommunications services. This discontinuance affects service in all states in which CTI/Starvox provides telecommunications service. This notice clarifies and supersedes any previous communications on this issue.

CTI/Starvox will cooperate with you through the date of discontinuance concerning the transition of your telephone service to an alternative carrier of your choice and will assist you in transitioning your existing local telephone number(s) where permitted. Please consult your local telephone directory or the incumbent local exchange carrier(s) in your area for a list of other possible providers. Should you need our assistance, please contact us at 800-673-2400. We regret to inform you that certain underlying vendors of critical services have threatened to cease providing service to CTI/Starvox. If any such vendor stops providing service, the effect could be to render us unable to provide service to you for reasons beyond our control even before the thirty (30) day period has expired. Thus, it is vital that you obtain service from a substitute provider immediately.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments within fifteen (15) days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20554, referencing the §63.71 Application of CTI/StarVox Communications Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

CTI/Starvox appreciates your business, and we regret that we will no longer be providing your telephone services. It has been our pleasure serving you.

CTI/Starvox Communications, Inc.

200 West Market Street • York, PA 17401 • www.captel.com
phone: 717-848-8800 • toll-free: 800-673-2400 • fax: 717-848-8806

CTI is a wholly owned subsidiary of StarVox Communications, Inc.