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READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
FORM 159

Approved by OMB
306A-0589
Page No. 1 of 2

(1) LOCKBOX # 979091			
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Bennet & Bennet, PLLC		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$1,015.00	
(4) STREET ADDRESS LINE NO. 1 4350 East West Highway, Suite 201			
(5) STREET ADDRESS LINE NO. 2			
(6) CITY Bethesda		(7) STATE MD	(8) ZIP CODE 20814
(9) DAYTIME TELEPHONE NUMBER (include area code) 202-371-1500		(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0005 8902 64			
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME Ardmore Telephone Company, Inc.			
(14) STREET ADDRESS LINE NO. 1 P.O. Box 549			
(15) STREET ADDRESS LINE NO. 2			
(16) CITY Ardmore		(17) STATE TN	(18) ZIP CODE 38449
(19) DAYTIME TELEPHONE NUMBER (include area code) 931-364-4355		(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0001 7728 88			
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE CUT	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$1,015.00	(27A) TOTAL FEE \$1,015.00		
(28A) FCC CODE 1	(29A) FCC CODE 2		
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE		
(28B) FCC CODE 1	(29B) FCC CODE 2		
SECTION D - CERTIFICATION			
I, <u>Colleen van Hollen</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE <u>Colleen van Hollen</u>		DATE <u>8-11-09</u>	
SECTION E - CREDIT CARD PAYMENT INFORMATION			
MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____			
ACCOUNT NUMBER _____		EXPIRATION DATE _____	
I hereby authorize the FCC to charge my credit card for the service(s) authorization herein described.			
SIGNATURE _____		DATE _____	



Law Offices of Bennet & Bennet, PLLC

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†Admitted in DC & VA Only

‡Admitted in DC & WA Only

§Admitted in DC & ME Only

August 11, 2009

Via Overnight Courier

Federal Communications Commission
Wireline Competition Bureau
c/o U.S. Bank – Government Lockbox #979091
SL-MO-C2-GL
1005 Convention Plaza
St. Louis, MO 63101
Attn: FCC Government Lockbox

Re: Application of Ardmore Telephone Company, Inc., Ardmore Communications, LLC and Synergy Technology Partners, Inc. for Consent to Assignment and Transfer of Control of Domestic Blanket Section 214 Authorizations

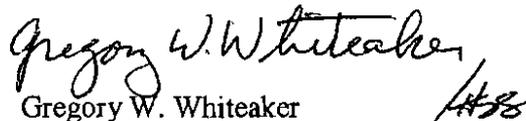
Dear Madam or Sir:

On behalf of Ardmore Telephone Company, Inc., Ardmore Communications, LLC and Synergy Technology Partners, Inc., enclosed are an original and five (5) copies of their Application for Consent to Assignment and Transfer of Control of Domestic Blanket Section 214 Authorizations. Included in this package are a completed Form 159 and a check in the amount of \$1,015.00 to cover the filing fee associated with this application.

Also enclosed is an additional copy of the application along with a return Federal Express envelope and shipping label for billing the shipment to our account. Please date-stamp and return the copy via overnight delivery.

Should you have any questions or require additional information with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,


Gregory W. Whiteaker

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Ardmore Telephone Company Inc., and)	
Ardmore Communications LLC)	
Transferors,)	WC Docket No. 09-_____
)	
and)	
)	
Synergy Technology Partners, Inc.,)	
Transferee,)	
)	
Application for Transfer of Control and)	
Assignment of Assets Pursuant to Section 214 of)	
the Communications Act of 1934, as Amended.)	
)	

**APPLICATION FOR CONSENT TO ASSIGNMENT AND TRANSFER OF CONTROL
OF DOMESTIC BLANKET SECTION 214 AUTHORIZATIONS**

The shareholders of Ardmore Telephone Company, Inc. ("Ardmore"), Ardmore Communications LLC ("Ardmore Communications"), and Synergy Technology Partners, Inc. ("Synergy" or "Transferee"), through their counsel, and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (the "Act"), and Sections 63.03 and 63.04 of the rules and regulations of the Federal Communications Commission ("FCC" or the "Commission"), 47 C.F.R. §§ 63.03, 63.04, hereby request authority for the merger of Ardmore and its sister company Ardmore Communications and the subsequent transfer of control of Ardmore and its blanket domestic Section 214 authorization from the current shareholders of Ardmore to Synergy. As described in this application, Synergy has agreed to purchase all of the outstanding stock of Ardmore in a cash-for-stock transaction, and Ardmore will become a direct,

wholly-owned subsidiary of Synergy.¹ Prior to, but in connection with Synergy's purchase of Ardmore's stock, Ardmore's sister company, Ardmore Communications, will merge with Ardmore. Accordingly, upon consummation of the proposed two-step transaction, Synergy will acquire control of Ardmore and the authorizations and assets previously held by Ardmore Communications.

I. BACKGROUND

Ardmore is a rural incumbent local exchange carrier ("ILEC") that provides local exchange telephone service, exchange access, and Internet service in five (5) exchanges in two (2) counties in south central Tennessee and two (2) counties in north central Alabama within a twenty-five (25) mile radius of Huntsville, Alabama. Ardmore offers bundled local and, through its sister company, Ardmore Communications, long distance services. Ardmore Communications provides long distance services as well as global international resale services pursuant to International Section 214 Authorization File Number ITC-214-20000214-00058, throughout Ardmore's service area.

Synergy is a newly-formed Tennessee corporation owned equally by West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") and Ben Lomand Rural Telephone Cooperative, Inc. ("Ben Lomand").

West Kentucky is an independent local exchange carrier ("LEC") that provides local exchange telephone service and exchange access service in twenty-three (23) exchanges in eight (8) counties in northwest Tennessee and west Kentucky. West Kentucky, through its

¹ See Stock Purchase Agreement by and among West Kentucky Rural Telephone Cooperative Corporation, Inc., Ben Lomand Rural Telephone Cooperative, Inc., Synergy Technology Partners, Inc., and Ardmore Telephone Company, Inc., *et al.* (June 19, 2009) ("Stock Purchase Agreement").

subsidiaries, also provides interexchange service, high-speed Internet service and advanced video services in its local telephone service area.

Ben Lomand is an independent LEC that provides local exchange telephone service and exchange access service in seventeen (17) exchanges in ten (10) counties in central Tennessee, as well as competitive local exchange service, video, high-speed Internet access and long distance service, either directly or through various subsidiaries, in central Tennessee.

Although both steps of the proposed transaction do not qualify for presumptive streamlining pursuant to Section 63.03 of the Commission's Rules, the transaction is both small and uncomplicated, and the parties seek to consummate the transaction prior to October 31, 2009. Ardmore's local telephone exchanges in Tennessee and Alabama do not overlap with and are not adjacent to any ILEC or competitive local exchange carrier ("CLEC") exchanges owned and/or operated by West Kentucky or Ben Lomand. Moreover, the merger of Ardmore and Ardmore Communications, arguably is *pro forma* pursuant to Rule Sections 63.03(d) and 63.24(d), and unquestionably is in the nature of a *pro forma* assignment. Out of an abundance of caution, however, the Applicant's seek FCC consent to the merger and transfer of control of Ardmore Communications.

II. INFORMATION REQUIRED BY SECTION 63.04

Pursuant to the requirements of Section 63.04(a) of the Commission's rules, the Applicants submit the following information:

(1) Name, Address and Telephone Number of each Applicant

Transferors: Shareholders of Ardmore Telephone Company, Inc.
c/o Ardmore Telephone Company, Inc.
P.O. Box 549
Ardmore, Tennessee 38449

Telephone: (256) 423-2131
Facsimile: (256) 423-2308

Ardmore Communications LLC
P.O. Box 549
Ardmore, Tennessee 38449

Telephone: (256) 423-2131
Facsimile: (256) 423-2308

Transferee: Synergy Technology Partners, Inc.
237 North 8th Street
P.O. Box 649
Mayfield, KY 42066

Telephone: (270) 856-1000
Facsimile: (270) 856-3651

(2) State of Organization and FRN

- (a) Ardmore is a corporation organized under the laws of the State of Tennessee. FRN: 0001772888.
- (b) Ardmore Communications is a limited liability company organized under the laws of the state of Tennessee. FRN: 0006059299.
- (c) Synergy is a corporation organized under the laws of the State of Tennessee. FRN: 0018995621.
- (d) West Kentucky is a corporation organized under the laws of the State of Kentucky. FRN: 0001792621.
- (e) Ben Lomand is a corporation organized under the laws of the State of Tennessee. FRN: 0005420468.

(3) Contact Information

All correspondence, notices and inquiries regarding this transaction should be addressed to:

Transferors: Terry Wales
General Manager
Ardmore Telephone Company, Inc.
P.O. Box 549
Ardmore, Tennessee 38449

Telephone: (256) 423-2131
Facsimile: (256) 423-2308

With a copy to:

Gregory W. Whiteaker
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814

Telephone: (202) 371-1500
Facsimile: (202) 371-1558

Counsel for Ardmore Telephone Company, Inc.

Terry Wales
Chief Manager
Ardmore Communications LLC
P.O. Box 549
Ardmore, Tennessee 38449

Telephone: (256) 423-2131
Facsimile: (256) 423-2308

With a copy to:

Gregory W. Whiteaker
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814

Telephone: (202) 371-1500
Facsimile: (202) 371-1558

Counsel for Ardmore Communications LLC

Transferee: Trevor R. Bonnstetter
President
Synergy Technology Partners, Inc.
237 North 8th Street
P.O. Box 649
Mayfield, KY 42066

Telephone: (270) 856-1000
Facsimile: (270) 856-3651

With a copy to:

Gregory W. Whiteaker
Bennet & Bennet, PLLC

4350 East West Highway
Suite 201
Bethesda, MD 20814

Telephone: (202) 371-1500

Facsimile: (202) 371-1558

Counsel for Synergy Technology Partners, Inc.

(4) Ten percent (10%) Equity Holders

Transferors:

Ardmore is a privately-held corporation owned by three families. The name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent (10%) of the equity of Ardmore (and the equity held to the nearest 1%) prior to the proposed transaction are:

Name & Address	Percent Equity/Vote	Citizenship	Principal Business
King W. Rogers III 6000 Poplar Avenue Suite 100 Memphis, TN 38119	12	U.S.	Attorney
Robert M. Rogers 530 Oak Court Street Suite 165 Memphis, TN 38117	15	U.S.	Investments
John A. Brayton P.O. Box 667 308 W Court Street Dyersburg, TN 38024	16	U.S.	Investments
Katherine M. Brayton P.O. Box 667 308 W Court Street Dyersburg, TN 38024	16	U.S.	Farming
Clyde Warren Nunn P.O. Box 8 101 Main Street Halls, TN 38040	30	U.S.	Banking

Ardmore Communications is a limited liability company owned and controlled by the same three families that own Ardmore. The members of Ardmore Communications are either the same individuals as the shareholders of Ardmore, the children of such shareholders, or trusts established for the benefit of the children of such shareholders. The name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent (10%) of the equity of Ardmore Communications (and the equity held to the nearest 1%) prior to the proposed transaction are:

Name & Address	Percent Equity/Vote	Citizenship	Principal Business
The Katherine Moss Rogers Irrevocable Trust Dated December 30, 1994, Judy P. Rogers, Trustee	8	U.S.	Homemaker
The King W. Rogers, IV Irrevocable Trust dated December 30, 1994, Judy P. Rogers, Trustee	8	U.S.	Homemaker
The Robert M. Rogers and Carolyn T. Rogers Trust under Trust Agreement dated December 31, 1994, Boyd L. Rhodes, Jr., Trustee	17	U.S.	Attorney
John A. Brayton P.O. Box 667 308 W Court Street Dyersburg, TN 38024	17	U.S.	Investments
Katherine M. Brayton P.O. Box 667 308 W Court Street Dyersburg, TN 38024	17	U.S.	Farming
Chris Nunn P.O. Box 8 101 Main Street Halls, TN 38040	17	U.S.	Banking
Nick Nunn P.O. Box 8 101 Main Street Halls, TN 38040	17	U.S.	Banking

Transferee:

Synergy is a corporation owned by:

Name and Address	Percent Equity/Vote	Citizenship	Principal Business
West Kentucky Rural Telephone Cooperative Corporation, Inc. 237 North 8th Street P.O. Box 649 Mayfield, KY 42066	50	KY Corp.	Telecommunications
Ben Lomand Rural Telephone Cooperative, Inc. 311 N. Chancery Street PO Box 670 McMinnville, TN 37111	50	TN Corp.	Telecommunications

West Kentucky is a Kentucky telephone cooperative owned by its member-subscribers. No member-subscriber owns a 10% or greater interest.

Ben Lomand is a Tennessee telephone cooperative owned by its member-subscribers. No member-subscriber owns a 10% or greater interest.

(5) Certification Pursuant to Rule Sections 1.2001-1.2003

Applicants have attached certifications, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to this application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

(6) Description of the Transaction

The proposed transaction entails the transfer of control of Ardmore from its current shareholders to Synergy. The transaction will be accomplished by Synergy's cash purchase of 100% of the issued and outstanding shares of Ardmore's common stock. Prior to the consummation of the transaction, Ardmore will have redeemed any and all issued and outstanding shares of preferred stock of Ardmore so that, as of the closing date of the proposed transaction, the issued and outstanding shares of common stock will constitute the only issued

and outstanding capital stock of Ardmore. Also, prior to, but in conjunction with, the sale of the common stock, Ardmore Communications will merge with and into Ardmore with Ardmore being the surviving company and Ardmore Communications ceasing to exist. Accordingly, as of the consummation of the proposed two-step transaction, Synergy will own 100% of Ardmore and will acquire control of Ardmore's domestic and international Section 214 authorizations.

Ardmore will continue to exist and will continue to provide service to its existing customers. Ardmore will continue to provide services upon the same rates, terms and conditions as immediately prior to the transaction. Any future changes in the rates terms and conditions will be pursuant to applicable law. The interstate and international long distances service previously provided by Ardmore Communications, but offered, billed, and serviced through Ardmore, will continue to be provided by Ardmore. Ardmore will continue to provide these services upon the same rates, terms and conditions as immediately prior to the transaction, and any changes thereto will be pursuant to applicable law. Accordingly, the proposed two-step transaction, and Synergy's acquisition of Ardmore's stock will be transparent to Ardmore's customers.

(7) Description of the Geographic Areas and Domestic Telecommunications Services Provided

(a) Description of Ardmore and Ardmore Communications

Ardmore is an independent, privately-held telecommunications company headquartered in Ardmore Tennessee. Ardmore provides local exchange telephone service and exchange access service as an ILEC in Giles and Lincoln counties in Tennessee and Limestone and Madison counties in Alabama. Ardmore serves approximately 8,420 access lines in five (5) exchanges in Tennessee and Alabama: Ardmore, AL/TN; Elkmont, AL; New Market, AL; Minor Hill, TN and McBurg, TN. Of Ardmore's local access lines, approximately 2,577 provide service to subscribers in Tennessee, with the remainder providing service to subscribers in

Alabama. All of Ardmore's central offices are digital, and are connected with approximately 150 miles of fiber optic cable. Ardmore provides Internet services throughout its service territory under the brand Ardmore.net.

Ardmore offers long distance service through its sister company, Ardmore Communications. Ardmore Communications is a non-facilities based reseller of long distance and international services. Ardmore Communications provides long distance telephone services to residential and business customers throughout Ardmore's service area in Giles and Lincoln counties in Tennessee and Limestone and Madison counties in Alabama. Ardmore Communications serves approximately 4,730 customers. Ardmore holds certificates of public convenience and necessity from the Tennessee Regulatory Authority and the Alabama Public Service Commission.

(b) Description of Synergy

Synergy is a Tennessee corporation formed for the purpose of the proposed transaction. Synergy is owned equally by West Kentucky and Ben Lomand. Synergy will be headquartered in Mayfield, Kentucky.

(c) Description of West Kentucky

West Kentucky is a Kentucky corporation formed in 1951 and headquartered in Mayfield, Kentucky. West Kentucky is a telephone cooperative, owned by its member-subscribers. West Kentucky provides local exchange telephone service, exchange access service as an ILEC to approximately 16,000 access lines in twenty-three (23) exchanges located in eight (8) counties in northwest Tennessee and west Kentucky. West Kentucky 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. West Kentucky through its subsidiary, West Kentucky Networks, Inc., also provides interexchange

service in West Kentucky's local telephone service area and is the presubscribed long distance provider on approximately 13,000 of West Kentucky's lines. West Kentucky also provides high-speed Internet access and advanced entertainment services in small-to-mid-size cities and towns through its broadband and fiber transport networks throughout its service area.

(d) Description of Ben Lomand

Ben Lomand is a Tennessee corporation formed in 1952 and headquartered in McMinnville, Tennessee. Ben Lomand is a telephone cooperative, owned by its member-subscribers. Ben Lomand provides local exchange telephone service, exchange access service as an ILEC in seventeen (17) exchanges located in central Tennessee. Ben Lomand provides service in Warren, White, Grundy counties, in major portions of Van Buren County, as well as limited portions of Coffee, DeKalb, Bedford, Rutherford, Cannon, and Marion counties in Tennessee. As of June 2009, Ben Lomand provided service to approximately 32,000 ILEC access lines.

Ben Lomand, through its wholly-owned subsidiaries, Ben Lomand Communications, LLC ("BLC") and Volunteer First Services, LLC ("VFS") also provides competitive local exchange service as a CLEC 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. ("Frontier"). Ben Lomand, through BLC, also 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 does not hold any FCC licenses to provide mobile telephony but resells the wireless services of another regional carrier.

(8) Streamlined Treatment, No Local Exchange Overlap

The Applicants do not request streamlined treatment of the Application, but request expeditious consideration of the Application since the parties seek to consummate the transaction prior to October 31, 2009. As explained below, the transfer of control of Ardmore to Synergy would qualify for streamlined processing, however, the merger of Ardmore Communications and Ardmore does not fall squarely in one of the presumptive streamlining categories of Rule Section 63.03.

The transfer of control of Ardmore would be presumptively subject to streamlined processing and does not raise competitive concerns. First, Ardmore, Synergy and their affiliates, including Ardmore Communications, West Kentucky, and Ben Lomand, both before and after the proposed transaction have a market share in the interstate, interexchange market of less than 10 percent. Second, Synergy will be taking control of the existing telephone exchange and exchange access services provided by Ardmore, and Ardmore and its owners have no affiliated telecommunications carriers that provide competitive telephone exchange services or exchange access services within the service areas of West Kentucky or Ben Lomand, and neither West Kentucky nor Ben Lomand nor their affiliates provide competitive telephone exchange services or exchange access services within the south central Tennessee or north central Alabama service areas of Ardmore. Where a proposed transaction meets these qualifications, an application for approval of a domestic transfer of control of Section 214 authority is presumptively subject to streamlined treatment when “[t]he applicants are incumbent independent local exchange carriers (as defined in § 64.1902 of this chapter) that have, in combination, fewer than two (2) percent of the nation’s subscriber lines installed in the aggregate nationwide, and no overlapping or

adjacent service areas.” 47 C.F.R. § 63.03(b)(2)(iii). For purposes of this section, the term “applicants” includes affiliates, which in the case of Synergy include West Kentucky and Ben Lomand. See 47 C.F.R. § 63.03(b)(3).

Ardmore, West Kentucky and Ben Lomand are ILECs under 47 C.F.R. § 64.1902. Together, the Applicants (and all their affiliates) serve fewer than 69,000 subscriber lines. Thus, in total, the Applicants serve fewer than two percent (2%), or 3,093,097, of the nation’s 154,654,847 subscriber lines installed in the aggregate nationwide. See *Local Telephone Competition: Status as of June 30, 2008*, Industry Analysis and Technology Division Wireline Competition Bureau, July 2009, Table 1.

Further, the Applicants are ILECs which have no overlapping or adjacent service areas. The map attached as Exhibit I to this application depicts the exchanges in Tennessee in which Ardmore, West Kentucky and Ben Lomand provide incumbent local exchange and exchange access service.² As represented therein, there are no overlapping or adjacent service areas.³

The merger of Ardmore Communications and Ardmore, arguably is *pro forma* and does not require prior FCC consent pursuant to Rule 63.03(d). Specifically, both companies are owned and controlled by members of the same three families. The companies are operated jointly, and Ardmore offers bundled long distance service provided by Ardmore Communications. Terry Wales, the General Manager of Ardmore, also is the Chief Manager and sole employee of Ardmore Communications. Accordingly, the merger arguably is *pro forma* and

² As disclosed above, Ben Lomand, through BLC and VFS also provides service as a CLEC in McMinnville, Sparta, and Crossville, Tennessee in areas in which Frontier is the ILEC. These service areas are depicted in blue with the number “12” in Warren and White Counties and in central Cumberland County, and do not overlap with, and are not adjacent to, Ardmore’s service area.

³ Only a map of Tennessee is attached because, as noted above, neither West Kentucky nor Ben Lomand provide service in Alabama, and Ardmore does not provide service in Kentucky. Moreover, neither West Kentucky’s nor Ben Lomand’s service area in Tennessee is adjacent to Ardmore’s service area in Alabama.

certainly is in the nature of a *pro forma* assignment. Out of an abundance of caution, however, the Applicant's seek FCC consent for the merger.

(9) Other Related Applications before the Commission

Concurrently herewith, the Applicants are filing an application seeking FCC approval of the transfer of control of Industrial/Business Pool, Conventional license - WNCW518 and Paging and Radiotelephone license - KPB295 held by Ardmore. Concurrently herewith, the Applicants also are filing an application for FCC approval of the assignment and transfer of control pursuant to Section 214 of the Act of the international Section 214 authorization held by Ardmore Communications, File Number ITC-214-20000214-00058. The Applicants anticipate that this international application will be subject to streamlined processing pursuant to Rule Section 63.12. A request for approval by the Tennessee Regulatory Authority was filed July 14, 2009. The Applicants also anticipate filing applicable notifications with the Alabama Public Service Commission and Kentucky Public Service Commission in the near future.

(10) Statement of Imminent Business Failure

No party to this application is requesting special consideration because of imminent business failure.

(11) Separately-Filed Waiver Requests

None.

(12) Public Interest Statement

The proposed transaction will serve the public interest, convenience and necessity, by providing significant benefits to the customers of Ardmore and Ardmore Communications without any countervailing harms. As discussed in Section 8 above, Ardmore, West Kentucky and Ben Lomand do not provide any local exchange or exchange access service in any overlapping or adjacent area, and the proposed transaction will not eliminate any competition in

the relevant markets. Post transaction, Ardmore will continue to provide high-quality services to its customers. The acquisition of Ardmore by Synergy will, however, bring together the experience and resources of two companies with a long history of providing service to customers in predominantly rural areas and smaller markets: West Kentucky and Ben Lomand. The transaction will allow Ardmore to achieve greater efficiencies and economies of scale and scope than if it were to continue to operate alone. This will enhance its ability to adapt and to provide its customers with a full portfolio of advanced communications services.

Ardmore's customers also will benefit from operational efficiencies. The local operations of Ardmore will continue to be managed by employees with extensive knowledge of the local telephone operations and the needs of the communities served. Back office systems and corporate functions, such as accounting, finance and legal, however, will become relatively less costly because of the economies of scale and the benefits of billing and services associated with the advanced back office and customer service systems to be deployed by West Kentucky and Ben Lomand through Synergy.

The proposed merger will serve the public interest by allowing the Ardmore family of companies to consolidate and to achieve the efficiencies of economy and scope discussed above. The proposed merger will not adversely affect competition. The Applicants, both before and after the proposed transaction, have a market share in the interstate, interexchange market of less than 10 percent. Moreover, the proposed merger will not result in any change in the long distance services offered by Ardmore.

Consistent with precedent, the proposed transaction will serve the public interest, convenience, and necessity by strengthening Ardmore and by directly benefiting all affected consumers. Accordingly, the Commission should approve the proposed transaction expeditiously.

III. CONCLUSION

For the foregoing reasons, Applicants respectfully request that the Commission process this Application pursuant to the Commission's streamlined procedures and promptly grant this Application.

Respectfully Submitted,

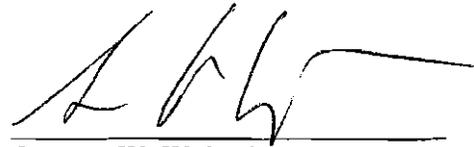
**ARDMORE TELEPHONE
COMPANY, INC. AND THE
SHAREHOLDERS OF ARDMORE
TELEPHONE COMPANY, INC.**



Gregory W. Whiteaker
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 371-1500

*Counsel for Ardmore Telephone
Company, Inc. and the Shareholders of
Ardmore Telephone Company, Inc.*

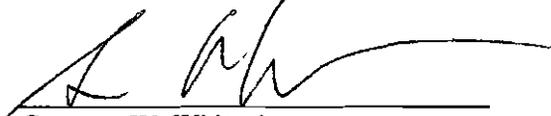
**SYNERGY TECHNOLOGY
PARTNERS, INC.**



Gregory W. Whiteaker
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
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(202) 371-1500

*Counsel for Synergy Technology Partners,
Inc.*

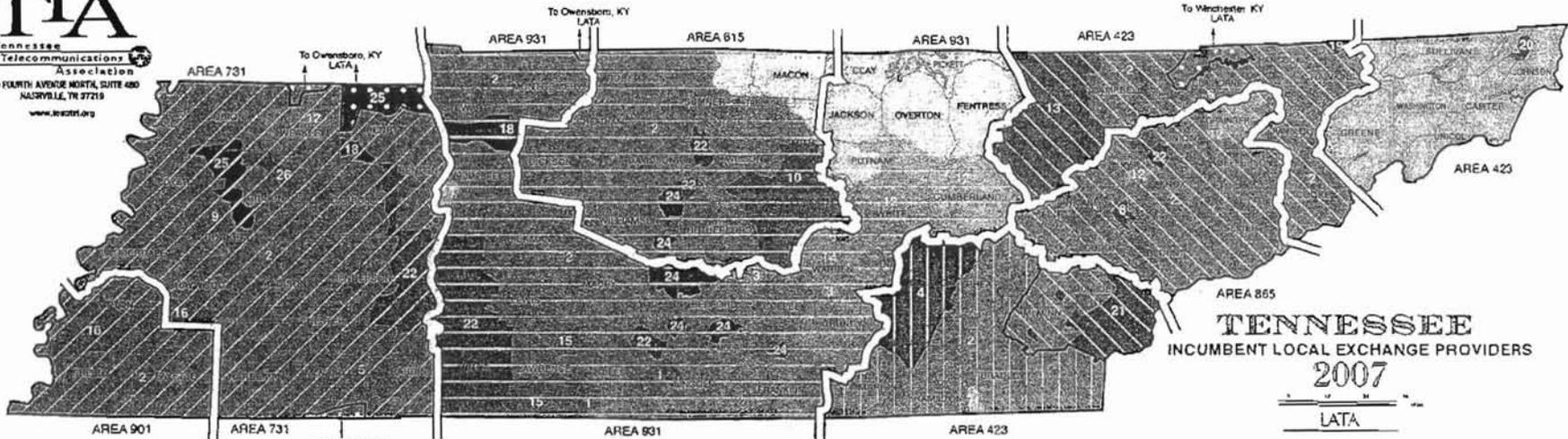
ARDMORE COMMUNICATIONS LLC



Gregory W. Whiteaker
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 371-1500

August 11, 2009

Exhibit I: Service Area Map



- 1 Ardmore Telephone Company, Inc.
- 2 AT&T Southeast
- 3 Ben Lomand Rural Telephone Cooperative, Inc.
- 4 Bledsoe Telephone Cooperative Corporation
- 5 Century Telephone of Adamsville, Inc.
- 6 Century Telephone of Claiborne, Inc.
- 7 Century Telephone of Coitewah, Inc.
- 8 Concord Telephone Exchange, Inc. (TDS Telecom)
- 9 Crockett Telephone Company, Inc. (TEC)

- 10 DTC Communications
- 11 Embarr
- 12 Frontier
- 13 Highland Telephone Cooperative, Inc.
- 14 Humphreys County Telephone Company (TDS Telecom)
- 15 Loreto Telephone Company, Inc.
- 16 Millington Telephone Company, Inc.
- 17 North Central Telephone Cooperative Corporation
- 18 People's Telephone Company, Inc. (TEC)

- 19 Scott County Telephone Cooperative, Inc.
- 20 Skyline Telephone Cooperative, Inc.
- 21 Tellico Telephone Company, Inc. (TDS Telecom)
- 22 Tennessee Telephone Company (TDS Telecom)
- 23 Twin Lakes Telephone Cooperative Corporation
- 24 United Telephone Company
- 25 West Kentucky Rural Telephone Cooperative Corporation, Inc.
- 26 West Tennessee Telephone Company, Inc. (TEC)

TENNESSEE
INCUMBENT LOCAL EXCHANGE PROVIDERS
2007
LATA

- Chattanooga
- Knoxville
- Memphis
- Nashville
- Tri Cities
- Other

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DECLARATION OF TREVOR R. BONNSTETTER

I, Trevor R. Bonnstetter, President of Synergy Technology Partners, Inc. ("Synergy"), declare under penalty of perjury that I have read the foregoing "Application for Consent to Assignment and Transfer of Control of Domestic Blanket Section 214 Authorizations" and the information contained therein regarding Synergy is true and accurate to the best of my knowledge information and belief. I further declare under penalty of perjury that Synergy, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting and/or non-voting) of Synergy, as specified in Section 1.2003(b) of the Commission's Rules, is not subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Executed on: 08/06/09



Trevor R. Bonnstetter
President,
Synergy Technology Partners, Inc.

DECLARATION OF TERRY WALES

I, Terry Wales, General Manager and officer of Ardmore Telephone Company, Inc. ("Ardmore Telephone") and Chief Manager of Ardmore Communications, LLC, ("Ardmore Communications" and collectively with Ardmore Telephone "Ardmore"), declare under penalty of perjury that that I have read the foregoing "Application for Consent to Assignment and Transfer of Control of Domestic Blanket Section 214 Authorizations" and the information contained therein regarding Ardmore is true and accurate to the best of my knowledge information and belief. I further declare under penalty of perjury that Ardmore, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares or membership interests (voting and/or non-voting) of Ardmore as specified in Section 1.2003(b) of the Commission's Rules, is not subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Executed on: 8-10-09

Terry M. Wales
Terry Wales
General Manager
Ardmore Telephone Company, Inc.
Chief Manager
Ardmore Communications, LLC