

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

In the Matter of)	
Federal-State Joint Board on Universal Service)	
)	
Pine Belt Cellular, Inc.)	WC Docket No. 08-71
Petition for Waiver of Sections 54.314)	
and 54.904 of the Commission's Rules)	
_____)	

To: Wireline Competition Bureau

SUPPLEMENT TO PETITION FOR WAIVER

Pine Belt Cellular, Inc. ("Pine Belt"), a provider of cellular and personal communications services to rural and non-rural areas in Alabama, is designated as an eligible telecommunications carrier ("ETC") by this Commission for the services it provides in Alabama. In May 2009 Pine Belt filed a Petition for Waiver seeking a waiver regarding its annual certification filing and certain line count revisions.

This Supplement is filed in response to the verbal request of Commission staff, seeking additional responsive information from Pine Belt regarding line count revisions. As the attached Declaration of Rod Ballard explains, Pine Belt's Section 54.314 certification was submitted in March 2009 after Pine Belt discovered, when it failed to received January and February 2009 high cost payments that the filing prepared prior to the October 1, 2008 deadline had not been received by USAC. In working with USAC to address this issue, Pine Belt discovered that additional revisions to its Forms 525 need to be made to address the additional ETC authority Pine Belt obtained in August 2008. Thus, line count revisions for ICLS, HCL and LSS were

submitted to USAC on May 28, 2009, following submission of the 2008 Section 54.904 ICLS certification on May 10, 2009.

As Pine Belt discussed in its Petition for Waiver, it has been an ETC since 2002, and it should be permitted to file revisions to its line counts back 24 months under USAC's revision policy (rather than being subject to the 60 day period for new ETCs). Pine Belt respectfully requests that the Commission grant a waiver, for reasons of hardship and equity, to Pine Belt to permit USAC to accept both its ICLS and HCM certifications. Pine Belt always has used all the USF funds it receives to provide quality service to the rural customers it serves, as is demonstrated in a recently supplemented Section 54.209 filing.

WHEREFORE, Pine Belt provides this supplemental information to the previously filed Petition for Waiver, and respectfully requests that its Petition be granted.

Respectfully submitted,

PINE BELT CELLULAR, INC.


By its Attorney

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Date: January 26, 2010

Exhibit 1

Declaration of Rod Ballard

I, Rod Ballard, do hereby declare under penalty of perjury as follows:

1. I am a certified public accountant and Principal in the accounting firm Jackson Thornton in Montgomery, Alabama.
2. This Declaration is submitted in support of Pine Belt Cellular, Inc.'s ("Pine Belt") Supplement to Petition for Waiver ("Supplement"). I have been retained to provide accounting and consulting services to Pine Belt, including assisting with Universal Service Fund issues and Pine Belt's regulatory compliance with the rules and policies of the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC").
3. I declare and certify as follows: Pine Belt's Section 54.314 filing was submitted on March 20, 2009, after it was determined that the filing we initially prepared in September 2008 for filing prior to October 1, 2008 did not get filed. The error was discovered by Pine Belt, when it did not receive HCM payments in January and February 2009. Subsequent discussions with USAC revealed that additional revisions to line count information needed to be made in relation ICLS, LSS and HCL filings. Pursuant to USAC's 24 month revisions policy, line count revisions were submitted on revised Form 525s on May 28, 2009. In addition a Section 54.904 ICLS certification for 2008 was sent to USAC via Federal Express on May 10, 2009. We prepared the revisions to the line counts and made revised filings with USAC on Pine Belt's behalf.
4. I have been asked to quantify for Pine Belt the lost USF revenue for Pine Belt. This amount of the projected revenue is approximately \$150,000, as follows:

HCM	\$21,000.	(January- June 2009)
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HCL	\$57,000.	(August 2008-June 2009)
LSS	\$17,000.	(August 2008-June 2009)
ICLS	\$55,000	(August 2008-June 2009)

5. Pine Belt has filed with USAC all the required the data and paperwork for reimbursement from the high cost fund. I make this declaration to assist Pine Belt's attempt to obtain the universal service funds necessary to serve its rural customers.
6. I declare that Pine Belt and Jackson Thornton have taken steps to assure future regulatory compliance. Pine Belt's President, John C. Nettles, has instituted new procedures and instructions for making and supervising FCC and USAC filing and regulatory compliance efforts, and I have instituted new review procedures at Jackson Thornton.
7. I further declare that I have reviewed Pine Belt's records and discussed the facts with Pine Belt's President and his staff, and the facts stated above are based upon my personal knowledge and review, and are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Date:

1/25/10


Rod Ballard