BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the matter of the Application
of Tennessee Telephone Service, LLC
d/b/a Freedom Communications USA, LLC
for a Certificate of Service Authority to
Provide Resold and Facilities-Based/UNE
Basic Local Telecommunications Services
in Portions of the State of Missouri and
to Classify Said Services and the Company
as Competitive.

Case No. LA-2010-0103

MOTION TO SUPPLEMENT APPLICATION

Tennessee Telephone Service, LLC dba Freedom Communications USA, LLC ("Applicant"), a Delaware Corporation, hereby moves to supplement its Application for Certification and to add material concerning its technical expertise as a provider of basic local telecommunications services, to demonstrate its compliance with Ch. 392.455(1), RSMo., and 4 CSR 240-3.510(1)(D)(1). In support of this Motion, the Applicant states the following:

1. The Applicant filed its Application on September 28, 2009, and supplemented the Application on November 4, 2009 and January 19, 2010.

2. Two of the Applicant's management employees, customer service manager (Jeannie Hutchison) and operations manager (Carol Proctor), who have both been employed by the Applicant for seven years, have extensive experience working with AT&T and other ILECs in provisioning orders and servicing customers. Ms. Hutchison routinely deals with customer problems and is responsible for crafting solutions to meet issues raised by customers with respect to their local exchange and interexchange telecommunications needs. Ms. Proctor deals directly with peer-level employees at AT&T and other ILECs from which the Applicant purchases UNEs and access lines, troubleshooting vendor relations issues as they arise. Both employees are instrumental to the Applicant's ability to order, provision, and respond to customer needs.

Wherefore, the Applicant moves to supplement its Application with the material provided in paragraph 2 hereof, and requests that the Commission and Staff consider this supplemental information in their review of the Application.

Respectfully submitted,

/s/ Mark P. Johnson Mark P. Johnson, Esq., MO Bar # 30740 Sonnenschein Nath & Rosenthal LLP 4520 Main, Suite 1100 Kansas City, Missouri 64111 (816) 460-2424 (816) 531-7545 (Fax) mjohnson@sonnenschein.com

Attorney for Applicant Tennessee Telephone Service, LLC d/b/a Freedom Communications USA, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on

the 21st day of January, 2010, on the following:

Jaime Ott Office of the General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Office of Public Counsel PO Box 2230 Jefferson City, MO 65102-2230

> /s/ Mark P. Johnson Mark P. Johnson