

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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)	Case No. LA-2010-0103
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.)	

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 the experience of its management in the operation of 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 a supplement to the Application on November 4, 2009.
2. As initial matter, the Applicant thanks the Commission and its Staff for their patience. Counsel has obtained biographical information concerning the extensive experience of Mr. Matt Davis, the Applicant's president, in the operation of a telecommunications carrier. Since he founded the Applicant in 2003, Mr. Davis has accumulated several years of experience in running a multi-state competitive local exchange carrier, which should be sufficient to satisfy the Commission that the Applicant's management has the expertise and experience to operate a CLEC providing basic local telecommunications services in Missouri, as required by 4 CSR 240-3.510(1)(D)(1).

3. Counsel was in contact with Staff counsel during the past two weeks and promised to provide the necessary background information prior to Staff's deadline for filing a recommendation. Counsel was unable to obtain the information before the deadline, however, and acknowledges Staff's filing of a negative recommendation on January 15, 2010, due to the absence of the background data.¹

4. Now that the data is in hand, the Applicant moves to supplement the information contained in Mr. Davis's resume, attached to the Application as part of Exhibit III. On the first page of Mr. Davis's resume, in the entry for Freedom Communications USA (the Applicant's fictitious name, which is properly registered as a fictitious name with the Missouri Secretary of State, as demonstrated in Exhibit I), the Applicant adds a fourth bullet point, as follows:

During his tenure as CEO, Mr. Davis has overseen the Company's certification in 17 states and ETC approval in 4 states. Under his management, company revenue has increased by over 1000% in 6 years. Mr. Davis currently oversees a staff of 37 people who are responsible for the provisioning of telecommunications services, servicing over 8,000 customers, responding to regulatory commission inquiries and data requests, and filing required periodic reports with federal and state regulatory commissions.

Wherefore, for good cause shown the Applicant moves to supplement its Application with the material provided in paragraph 4 hereof, and requests that the Commission and Staff consider this supplemental information in their review of the Application.

Respectfully submitted,

/s/ Mark P. Johnson
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¹ Staff's Recommendation refers in paragraph 6 to interexchange services, while the attached Memorandum refers to basic local telecommunications. The Applicant understands that Staff's Recommendation relates to basic local telecommunications.

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Tennessee Telephone Service, LLC
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on the 19th day of January, 2010, on the following:

Jaime Ott
Office of the General Counsel
Missouri Public Service Commission
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/s/ Mark P. Johnson
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