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July 25, 2013

Ms. Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, South Carolina 29211

Re: Docket No. 2013-14-C: Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.314 and Telecommunications Act Section 254(e), Federal Communications Commission CC Docket No. 96-45 (2012); and Annual Reports for ETC

Dear Ms. Boyd:

This letter is to request that the Public Service Commission of South Carolina ("Commission") submit a letter to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC") certifying that BellSouth Telecommunications, LLC d/b/a AT&T South Carolina (AT&T South Carolina) is in compliance with all provisions of Section 254(e) of the Telecommunications Act.

The amount of federal high-cost support AT&T South Carolina will receive in 2014 will be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, AT&T South Carolina certifies that it will only use the federal high cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Until the FCC issued its USF/ICC Transformation Order (17 FCC Rcd 17663) in November 2011, AT&T South Carolina submitted certifications directly to the FCC, and not to this Commission, because it only received Interstate Access Support ("IAS"). In its November 2011 Order, however, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. *See FCC Order* at para. 614.

At the same time, the FCC expanded the state certification requirements to require state Commissions to certify that even carriers that only receive IAS support, which the FCC now calls "frozen high-cost support," are in compliance with Section 254(e) of the Telecommunications Act. *See* 47 C.F.R. § 54.314(a). AT&T South Carolina, therefore, respectfully requests that the Commission accept this letter and the attached affidavit as self-certification that AT&T South Carolina is in compliance with 47 U.S.C. § 254(e) and issue a letter to the FCC certifying that AT&T South Carolina used its high-cost support in the preceding year and will use its high-cost support in the coming calendar year in

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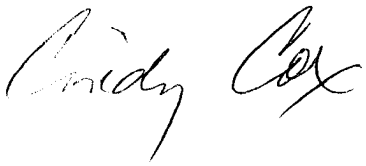
compliance with Section 254(e) of the Act and therefore is eligible to receive federal high-cost support in 2014.

Sincerely,



AFFIDAVIT OF CINDY COX
EXECUTIVE DIRECTOR
BELLSOUTH TELECOMMUNICATIONS LLC, d/b/a AT&T SOUTH CAROLINA
Study Area SC 245194

1. My name is Cindy Cox. I am employed by BellSouth Telecommunications LLC, d/b/a AT&T South Carolina as Executive Director, and am authorized to give this Affidavit. This Affidavit is being given to support the Public Service Commission of South Carolina's certification as required by 47 C.F.R. § 54.314(a).

2. Until the FCC's Nov. 2011 USF/ICC Transformation Order (17 FCC Rcd 17663) (hereinafter "*FCC Order*"), AT&T South Carolina submitted its certifications directly to the FCC as it only received Interstate Access Support (IAS). As part of the *FCC Order*, the FCC eliminated IAS as a stand-alone support mechanism and with it, eliminated the need for carriers to file IAS certifications. *See FCC Order* at para. 614. As a result, and in order for the Public Service Commission of South Carolina to certify AT&T South Carolina's continued eligibility for high-cost support in 2014, AT&T South Carolina provides the following certification:

   Consistent with section 254(e) of the Communications Act of 1934, as amended, AT&T South Carolina used in the preceding year (2012) and will use in the upcoming year (2014) all of its federal high-cost support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Cindy Cox
Cindy Cox
Executive Director, AT&T South Carolina

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

Subscribed and sworn to before me this 25th day of July 2013.

Julia M Janey
NOTARY PUBLIC

My Commission Expires: 2/16/22
Commission No.: N/A

(Notary Seal)