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OFFICE OF THE
EXECUTIVE SECRETARY

May 30, 2002

Mr. Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to Declare Switching an Unrestricted Network Element
Docket No. 02-00207*

Dear Mr. Waddell:

Network Telephone Corporation objects to BellSouth's First Set of Discovery Requests in TRA Docket No. 02-00207. We object because Network Telephone is not a party to this proceeding. Additionally, Network Telephone objects because the information requested by BellSouth appears to be a request for competitively sensitive information which Network Telephone would not want shared with competitors in Tennessee, in particular BellSouth.

Lastly, not having a formal standing in this docket, Network Telephone would be denied the protection of a normal party. As such, Network Telephone would suffer if our network information, capacities, market presence, etc. were made publicly available through this request.

Please contact me if you have questions.

Sincerely,

Brent E. McMahan
Vice President – Regulatory
& Governmental Affairs