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June 3, 2002

OFFICE OF THE
EXECUTIVE SECRETARY

S. BARTOW STRANG
1882-1954

JOHN S. FLETCHER
1879-1961

JOHN S. CARRIGER
1902-1989

JOHN S. FLETCHER, JR.
1911-1974

ALBERT L. HODGE
1910-1997

F. THORNTON STRANG
1920-1999

* ALSO LICENSED IN GEORGIA
* ALSO LICENSED IN ALABAMA

VIA FEDERAL EXPRESS

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

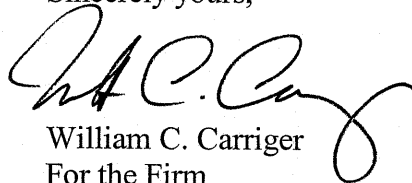
Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case Proceeding to
Declare Switching an Unrestricted Unbundled Network Element,
Docket No. 02-00207*

Dear Mr. Waddell:

Enclosed are the original and thirteen (13) copies of the Electric Power Board of Chattanooga's Responses to BellSouth's First Set of Discovery Requests.

Responses subject to the Protective Order are being submitted separately under seal.

Sincerely yours,


William C. Carriger
For the Firm

WCC:tm

EPB/TEL - #120

Enclosures

cc: Guy M. Hicks, Esq.
Joelle J. Phillips, Esq.
Henry Walker, Esq.
Charles B. Welch, Jr., Esq.
Andrew O. Isar, Esq.