

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

RECEIVED  
2004 JAN 21 PM 3:00

January 21, 2004

T.R.A. DOCKET ROOM

*IN RE: Implementation of the Federal* ) *Docket No 03-00491*  
*Communications Commission's Triennial* ) *Docket No 03-00527*  
*Review Order (Nine-Month Proceeding)* )  
*(Switching )and (Loop and Transport)* )

---

**MOTION TO REQUIRE BELL SOUTH TO FILE RESPONSES TO SUBPOENAS WITH  
THE TENNESSEE REGULATORY AUTHORITY**

---

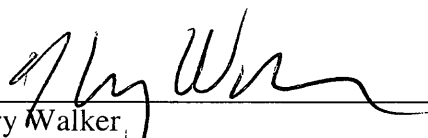
Competitive Carriers of the South, Inc. ("CompSouth") moves to require BellSouth Telecommunications, Inc. ("BellSouth") to file with the Tennessee Regulatory Authority copies of all responses received by BellSouth to the subpoenas issued in this docket to non-parties.

CompSouth understands that the Protective Order issued by the Hearing Officer in this docket protects confidential information submitted by parties as well as confidential information submitted by non-parties in response to a subpoena. Therefore, all such information will be protected from disclosure in accordance with the terms of the Protective Order.

Copies of this Motion have been served on all parties as well as on all non-parties who submitted information to BellSouth in response to a subpoena.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

Henry Walker  
414 Union Street, Suite 1600  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363

## CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2004, a copy of the foregoing document was serviced on the parties of record, via US mail:

Martha M. Ross-Bain, Esq.  
AT&T Communications of the  
South Central States, LLC  
1200 Peachtree Street, Suite 8062  
Atlanta, GA 30309

Ms. Carol Kuhnow  
Qwest Communications, Inc.  
4250 N. Fairfax Dr.  
Arlington, VA 22203

Charles B. Welch, Esq.  
Farris, Mathews, et. al.  
618 Church St., #300  
Nashville, TN 37219

Jon E. Hastings  
Boult Cummings Conners Berry, PLC  
P. O. Box 198062  
Nashville, TN 37219-8062

Timothy Phillips, Esq.  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, TN 37202

Dale Grimes  
Bass, Berry & Sims  
315 Deaderick St., #2700  
Nashville, TN 37238-3001

H. LaDon Baltimore, Esq.  
Farrar & Bates  
211 Seventh Ave., N. #320  
Nashville, TN 37219-1823

Mark W. Smith, Esq.  
Strang, Fletcher, et. al.  
One Union Square, #400  
Chattanooga, TN 37402

James Wright, Esq.  
United Telephone – Southeast  
14111 Capital Blvd.  
Wake Forest, NC 27587

Nanette S. Edwards, Esq.  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201  
Mr. Paul Rice  
Aeneas Communications, LLC  
301 S. Church St.  
Jackson, TN 38301

Kennard B. Woods, Esq.  
WorldCom, Inc.  
Six Concourse Parkway, Suite 600  
Atlanta, Georgia 30328  
Judy Tinsley  
ALEC, Inc.  
250 W. Main Street, #1920  
Lexington, KY 40507

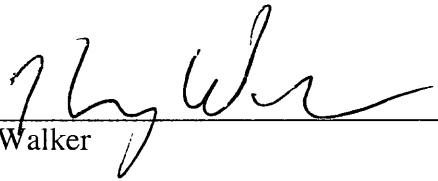
Michael J. Shortley, Esq.  
Global Crossing Telecom.  
1080 Pittsford-Victor Road  
Pittsford, NY 14534  
Anne Gerry, Esq.  
Arnall Golden Gregory  
1201 W. Peachtree St., NW, #2800  
Atlanta, GA 30309  
Dana Shaffer, Esq.  
XO Communications, Inc.  
105 Molloy St., #300  
Nashville, TN 37201

Jim Falvey  
Xspedius Management Co., LLC  
7125 Columbia Gateway Dr.  
Columbia, MD 21046

Jennifer Anderson  
Telcove  
712 N. Main Street  
Coudersport, PA 16915  
Gregg Sayre, Esq.  
Frontier  
180 S. Clinton Ave.  
Rochester, NY 14646  
Michele K. Thomas  
T-Mobile  
12050 Baltimore Ave.  
Beltsville, MD 20705

Michael Donohue, Esq.  
Swidler Berlin, et al  
3000 K St., NW #300  
Washington, DC 20007  
Charles G. Elliott  
Memphis Networx, LLC  
7620 Appling Center Dr., #101  
Memphis, TN 38133  
Wanda Montano  
Vice President - Regulatory & Industry  
Affairs  
LEC of Tennessee, Inc.  
6801 Morrison Blvd.  
Three Morrocroft Centre  
Charlotte, NC 28211  
Ken Russell  
Loadpoint Telecommunications, LLC  
3200 West End Ave.  
Nashville, TN 37203

Stephen Rowell  
AllTel Communications, Inc.  
One Allied Rive  
Little Rock, AR 72202  
Daniel Davis, Esq.  
LightCore  
14567 N. Outer Forty Rd., #500  
Chesterfield, MO 63017  
Jennifer Martin  
Teligent, Inc.  
460 Herndon Parkway, #100  
Herndon, VA 20170

  
Henry Walker