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Reply to
Nashville Office

April 4, 2006

Chairman Ron Jones
Attn: Ms. Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: Notice of Rulemaking of General Public Utility Rules, Docket No. 04-00284

Dear Chairman Jones:

By way of this letter, submitted through its attorneys, Time Warner Telecom of the MidSouth, LLC ("TWTC") provides comments in the referenced docket and offers proposed revisions to the draft rules. In light of recent legislative actions by the Tennessee General Assembly, federal court decisions, and rules promulgated by the FCC which dilute or limit the regulatory jurisdiction of this Authority over regulated telecommunications services, TWTC has several suggestions related to the draft rules necessary to ensure that IXC's and CLEC's are treated equitably as compared to incumbent local exchange carriers.

TWTC suggests that on page 1, under Rule 1220-4-1-04 (1), that a new section "(c)" be added that states as follows: "*Competing local exchange carriers shall not be required to file tariffs; however, if they choose to file a tariff, any tariff filed by a competing local exchange carrier shall become effective upon filing.*"

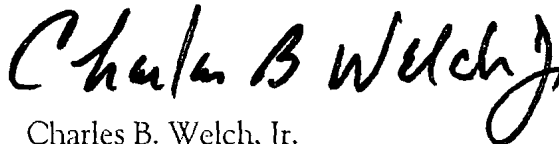
Additionally, in paragraph (4) of rule 1220-4-1-06 Changes in Tariff should be amended to read as follows:

Subject to the provisions of Rule 1220.4-1-04(1)(c), all tariffs and supplements affecting Tennessee intrastate inter-exchange business except those tariffs filed pursuant to 1220-4-1-04(a) and 1220-4-1-(04)(b) shall be filed with the Tennessee Regulatory Authority at least thirty (30) days before the date upon which they are to become effective unless upon application and for good cause shown the Authority may waive the thirty (30) day time limit or any portion thereof.

Consistent with the foregoing revisions, subparagraphs (b)(1), (b)(2), and (b)(3) of paragraph(3) of rule 1220-4-2-55 should each begin with the phrase "*Subject to the provisions of Rule 1220.4-1-04(1)(c).*" As a natural extension of this concept of a deregulated environment, Rule 1220-4-8-07 (2) (b), Tariff and Pricing Requirements for Competing Local Telecommunications Service Providers Local Service, including tariff price increase requirements, should not be applicable to CLECs, as market forces have developed to the extent to ensure just and reasonable prices in the most time efficient manner.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC

A handwritten signature in black ink that reads "Charles B. Welch, Jr." The signature is written in a cursive, flowing style with a large, prominent "C" at the beginning and a long, sweeping underline that extends to the right.

Charles B. Welch, Jr.