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August 29, 2008

Chairman Tre Hargett
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Comments of United Telephone Southeast LLC d/b/a Embarq
Docket No. 05-00237

filed electronically 8/29/08

Dear Chairman Hargett:

United Telephone Southeast LLC d/b/a Embarq ("Embarq") respectfully submits these comments to the Tennessee Regulatory Authority ("Authority") concerning the Authority's proposed Telecommunications Rule Governing the Operations and Funding Mechanism For the Tennessee Relay Service ("TRS"), at Chapter 1220-4-14. Embarq reserves the right to make additional comments prior to the Authority closing the comment cycle in this docket.

In reviewing the proposed rules, Embarq supports the Authority's broad definition of "Contributing Service Provider" at Rule 1220-4-14-.01(5). The definition ensures that all providers offering real-time voice communication services that originate and terminate within the state support the goals of TRS on an equal basis. The definition specifically includes wireless and IP-based providers. The Authority's approach is most consistent with the General Assembly's policy of protecting the interests of consumers without unreasonable prejudice or disadvantage to specific service providers. See Tenn. Code Ann. § 65-4-123. Competitive providers, including wireless and IP-based services, benefit from TRS and should equally contribute towards its support.

In addition, Embarq appreciates the Authority's proposal under Rule 1220-4-14-.05(3) that allows contributing service providers to recover amounts collected for TRS funding through an itemized line item on the end user's bill. Embarq also supports the modifications to Rule 1220-4-14-.03(2) that adopts a cap for the TRS reserve fund. Finally, Embarq recognizes the Authority's adoption of Embarq's clarifying language under Rule 1220-4-14-.04(1) that provides for appointment of the TRS Operation Administrator in a manner consistent with the requirements of Tenn. Code Ann. § 12-4-109.

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Wherefore, Embarrq lends its full support to the Authority's proposed TRS rules. The Authority's proposal strengthens TRS by diversifying its support in a fair and competitively neutral manner.

Finally, please do not hesitate to contact me with any questions concerning this matter.

Sincerely,

A handwritten signature in blue ink, reading "Edward Phillips", with a long horizontal flourish extending to the right.

Edward Phillips

HEP:sm