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September 29, 2006

T.A.A. DOCKET ROOM

Hearing Officer Monica Smith-Ashford
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN

**Re: Generic Docket to Establish a Rate for Switching Provided Pursuant to Requirements
Other Than 47 U.S.C. 251
Docket No. 06-00080**

Dear Hearing Officer Smith-Ashford:

On behalf of Momentum Telecom, Inc., I am filing today the attached petition to intervene in the above-captioned proceeding.

Please note that the original hearing notice stated that "petitions to intervene" were to be filed by September 29, 2006. Prior to that time, there were no "parties" to this proceeding because no one had intervened. For example, BellSouth's September 13, 2006, letter requesting a pre-hearing conference does not indicate that it was sent to anyone except the Hearing Officer. Since there was no parties to serve, BellSouth acted properly. The Hearing Officer then granted BellSouth's request because, in part, "no opposition" to the motion had been filed.

This docket is of critical importance to Momentum. It has been more than six months since the Authority opened this proceeding but the agency has made no appreciable progress. Based on the Hearing Officer's most recent notice, there are currently no further dates set for meetings or filings. Momentum therefore asks that notice be sent to all potentially interested parties of a pre-hearing conference to be held within two weeks for the purpose of setting a procedural schedule and addressing any other matters which need to be resolved in order to bring this matter to completion.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

HW/djc

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

September 29, 2006

Re : Generic Docket to Establish a Rate for)
Switching Provided Pursuant to Requirements) Docket No. 06-0080
Other Than 47 U.S.C.)

PETITION TO INTERVENE OF MOMENTUM TELECOM, INC.

Momentum Telecom, Inc. ("Momentum") petitions the Authority to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(a).

Momentum is a competitive local exchange carrier certified by the Tennessee Regulatory Authority ("TRA"). This proceeding will address, among other things, the terms and conditions under which Momentum may operate in Tennessee. Specifically, this proceeding will establish the terms and conditions under which Momentum may lease unbundled switching from BellSouth Telecommunications, Inc. pursuant to 47 U.S.C. §271. Therefore, the legal rights, duties, privileges, immunities, or other legal interests of Momentum may be affected or determined by the outcome of this proceeding. Granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

Momentum, therefore, asks that this Petition to Intervene be granted.

Respectfully submitted,

By: 

Henry Walker

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600

Nashville, Tennessee 37219

(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to:

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Ste. 2101
Nashville, TN 37201-3300

on this the 29th day of September, 2006


Henry M. Walker