#### LAW OFFICES

#### GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

GARETH S. ADEN G. RHEA BUCY CHRISTOPHER W. CARDWELL GEORGE V. CRAWFORD, JR. GEORGE V. CRAWFORD III A. SCOTT DERRICK THOMAS H. FORRESTER MARY TAYLOR GALLAGHER MARY BETH HAGAN MARCY S. HARDEE M. TAYLOR HARRIS, JR. DAN HASKELL ANDRA J. HEDRICK LINDA W. KNIGHT JOEL M. LEEMAN ALLEN D. LENTZ MOLLIE E. MAHAN

STREET ADDRESS:
315 DEADERICK STREET, SUITE 1100
NASHVILLE, TENNESSEE 37238

MAILING ADDRESS:
POST OFFICE BOX 198888
NASHVILLE, TENNESSEE 37219-8888

TELEPHONE (615) 244-4994
FACSIMILE (615) 256-6339
WWW.GSRM.NET

October 27, 2006

JOSEPH MARTIN, JR.
MARISSA A. MOSES
WM. ROBERT POPE, JR.
JACK W. ROBINSON, JR.
JACK W. ROBINSON, SR.
WESLEY D. TURNER
PHILLIP P. WELTY
MARK H. WESTLAKE

OF COUNSEL
TREVOR W. HOWELL
JOHN D. LENTZ
SULLIVAN F. MARSDEN

B. B. GULLETT
1905-1992

VALERIUS SANFORD
1923-2001

<u>VIA HAND-DELIVERY</u>

Hearing Officer Monica Smith-Ashford ATTN: Sharla Dillon Tennessee Regulatory Authority 460 James Robertson Pkwy. Nashville, TN 37243-0505

TR.A. DOCKET ROOM

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:

Enclosed for filing in the above-mentioned proceeding are an original and 14 copies of the Petition to Intervene of AT&T Communications of the South Central States, LLC and TCG MidSouth, Inc. Please date stamp one copy and return it to me for my records. Also enclosed are the requisite filing fees.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

ndk W. Robinson, Jr.

JWRjr:bh Enclosures

cc: Guy M. Hicks, Esq.

Joelle Phillips, Esq. Henry Walker, Esq.

## BEFORE THE TENNESSEE REGULATORY AUTHORITY Nashville. Tennessee

IN RE:	GENERIC DOCKET TO ESTABLISH	)	
	A RATE FOR SWITCHING	)	
	PROVIDED PURSUANT TO	)	Docket No. 06-00080
	REQUIREMENTS OTHER THAN	)	
	47 U.S.C. § 251	)	

# PETITION TO INTERVENE OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC AND TCG MIDSOUTH, INC.

Petitioners, AT&T Communications of the South Central States, LLC and TCG MidSouth, Inc., hereby respectfully petition the Tennessee Regulatory Authority ("TRA") to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(a).

AT&T Communications of the South Central States, LLC is a competitive local exchange carrier authorized to provide intraLATA and interLATA telecommunications services. TCG MidSouth, Inc. is authorized to provide facilities-based and resold local exchange and interexchange telecommunications services. Both Petitioners hold certificate(s) of public convenience and necessity issued by the TRA.

As the stated purpose of this proceeding is to establish a rate for switching provided pursuant to requirements other than 47 U.S.C § 251, such rate(s) set herein may affect the business and rates charged to or by Petitioners and may also indirectly affect their customers. Accordingly, this proceeding will address, among other things, certain terms and conditions under which Petitioners may operate in Tennessee. The legal rights, duties, privileges, immunities or other legal interests of Petitioners may be determined in this proceeding.

Petitioners' interests will not be adequately represented unless allowed to intervene. Granting this Petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

WHEREFORE, premises considered, Petitioners pray that:

- 1. An Order be entered allowing Petitioners to intervene and participate in this proceeding, as their interests may appear, and to receive copies of all notices, pleadings, orders and other documents that are filed herein; and
- 2. Petitioners have such other, further and general relief to which they may be entitled.

Respectfully submitted,

Jack W. Robinson, Jr. #11656

GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

Suite 1100

315 Deaderick Street

Nashville, Tennessee 37219-8888

(615) 244-4994

jrobinsonjr@gsrm.com

Attorney for Petitioners, AT&T Communications of the South Central States, LLC and TCG MidSouth, Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing on the following persons by depositing a copy of the same in the United States Mail, postage prepaid, this 27<sup>th</sup> day of October, 2006.

Guy M. Hicks Joelle Phillips Bell South Telecommunications, Inc. Suite 2101 333 Commerce Street Nashville, TN 37201-3300

Henry Walker Boult, Cummings, Conners & Berry, PLC 1600 Division Street, Suite 700 P. O. Box 198062 Nashville, TN 37219-8062

Jack W. Robinson, Jr