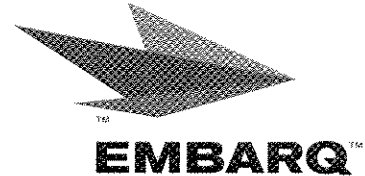


Voice | Data | Internet | Wireless | Entertainment



Embarq Corporation  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, NC 27587-5900  
EMBARQ.com

June 13, 2006

Chairman Ron Jones  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Filed Electronically in Docket Office on 06/13/06 @ 10:50

Re: Petition to Intervene by United Telephone-Southeast, Inc. d/b/a Embarq  
Docket No. 06-00151

Dear Chairman Jones:

Please find enclosed an original and three (3) copies of United Telephone-Southeast, Inc.'s ("Embarq's") Petition to Intervene in the above-referenced Docket. Please note that Embarq has already filed this petition electronically and this letter is the required follow-up to that filing. Also enclosed is a check in the amount of \$25.00 to cover the filing fee.

An extra copy of this letter is enclosed. Please date stamp it and return to me in the enclosed self-addressed stamped envelope. Finally, please do not hesitate to contact me if you have any questions concerning this request.

Sincerely yours,

Edward Phillips

HEP:sm

Enclosures

cc: Mr. Don Franklin

Edward Phillips  
ATTORNEY  
Voice: (919) 554-7870  
Fax: (919) 554-7913  
edward.phillips@EMBARQ.com

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

In Re:

Petition of Telescan, Inc. For A Certificate of  
Convenience and Necessity to Provide Facilities-  
Based and Resold Local Exchange and Exchange  
Access Services Throughout the State of Tennessee

Docket No. 06-00151

PETITION TO INTERVENE

United Telephone-Southeast, Inc. d/b/a/ Embarq (“Embarq”) petitions the Tennessee Regulatory Authority (“Authority”) for leave to intervene under Tenn. Code Ann. §§ 4-5-310 and 65-2-107 and Rule 1220-1-2-.08 of the Authority’s Rules and Regulations in this matter. In support of this request, Embarq states the following:

1. Embarq is an incumbent local exchange carrier in the State of Tennessee and provides comprehensive telecommunications services to customers located in Northeast Tennessee.

2. Telescan, Inc. (“Telescan”) seeks approval to provide facilities-based and resold local exchange and exchange access services throughout the State of Tennessee. Embarq has a direct interest in how Telescan seeks to provide such services in the Embarq service territory, especially when those services may affect the provisioning of County Wide calling to Embarq customers.

3. Specifically in Exhibit M, which is attached to Telescan’s application, Telescan indicates that it “. . . is aware of the Tennessee County Wide calling database made by BellSouth and the procedure to enter telephone numbers on the database.” Assuming that Telescan is

confirming that they are aware of the statewide database, it has not as yet indicated its willingness to comply with the obligations and procedures to provide County Wide calling.

4. Since Telescan seeks authority to provide services in Embarq's Upper East Tennessee exchanges, Telescan's failure to appropriately enter its customer's numbers into the statewide database could result in Embarq customers being incorrectly billed for County Wide calls. The Authority Staff has also expressed an interest in how Telescan will comply with its County Wide calling obligations as evidenced in the Staff's data request sent to Telescan on June 6, 2006.

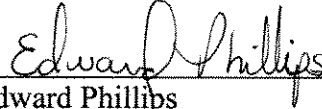
5. As demonstrated above, Embarq has set forth specific facts demonstrating that its legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.

6. Because of its direct interest in this proceeding, Embarq believes its intervention in this matter is warranted.

7. Finally, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.

WHEREFORE, based on the foregoing, Embarq respectfully requests that the Authority grant this Petition and permit Embarq to become a full party of record in this docket.

Respectfully submitted this 13<sup>th</sup> day of June, 2006.



Edward Phillips

Attorney

United Telephone-Southeast, Inc.

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Wake Forest, North Carolina 27587-5900

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Tennessee B.P.R. No. 016850

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Petition to Intervene of United Telephone-Southeast, Inc. upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

Mr. Don Franklin  
Telescan, Inc.  
P. O. Box 4747  
Johnson City, TN 37602

This 13<sup>th</sup> day of June, 2006.



Edward Phillips

United Telephone-Southeast, Inc.