

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

**APRIL 30, 2007**

*In re: Complaint of BLC Management, LLC d/b/a )  
Angles Communication Solutions Against BellSouth ) Docket No. 07-00053  
Telecommunications, Inc. to Resolve Billing Disputes, )  
Enforce the Parties' Interconnection Agreement, and )  
Prevent Interference with Service to Customers )*

**RESPONSE OF BLC MANAGEMENT, LLC D/B/A ANGLES COMMUNICATION  
SOLUTIONS TO LETTER FROM BELL SOUTH TELECOMMUNICATIONS, INC.  
REQUESTING APPOINTMENT OF HEARING OFFICER AND OTHER RELIEF**

Late Friday afternoon, BellSouth Telecommunications, Inc. ("BellSouth") filed a letter with the Authority concerning the complaint brought against BellSouth by Angles Communication Solutions ("Angles"). In that letter, BellSouth claims that Angles "continues to pay even undisputed amounts owned to BellSouth." BellSouth requests that the Authority appoint a Hearing Officer who will presumably supervise the parties' pending mediation session, scheduled for May 17, 2007.<sup>1</sup> BellSouth asks that, if the mediation fails, the Hearing Officer be authorized to issue an order allowing BellSouth to disrupt Angles's ability to serve its 3,000 Tennessee customers, all of whom live in and around Memphis.

This Response is to notify the Authority that Angles strongly disputes the allegations set forth in Mr. Hick's letter. Angles continues to pay BellSouth all current, undisputed charges and has previously filed two affidavits from an outside consulting firm attesting to those facts.

On March 6, 2007, Angles filed an affidavit from Steve Watson of CGM, L.L.C. Telecom Services ("CGM") stating that "CGM records show that Angles has paid the entire

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<sup>1</sup> The parties are scheduled to meet with the Staff on May 17, 2007. Angles and its representatives were available to meet either this week or next week but were informed that other participants were not available until the 17<sup>th</sup>.

undisputed amounts of their BellSouth invoices from June, 2006, through [the] present time [February 28, 2007].” In response, BellSouth has filed nothing but unsubstantiated letters from the company’s billing department. Mr. Watson is presently preparing a second affidavit regarding the period from February 28, 2007, through the present date. Angles will file that affidavit with the Authority along with a more complete response to BellSouth’s letter. That response will be filed by Friday, May 4, 2007, in accordance with the Authority’s rules. TRA Rule 1220-1-2-.06(2).

The parties have not agreed as to what, if any, undisputed amounts Angles owed to BellSouth prior to June, 2006. At BellSouth’s request, Angles has agreed to a mediation session with the TRA Staff to try to resolve this dispute which has now been pending for approximately eleven months. If mediation fails and the parties are unable to settle the matter, Angles will proceed on the merits of its Complaint.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

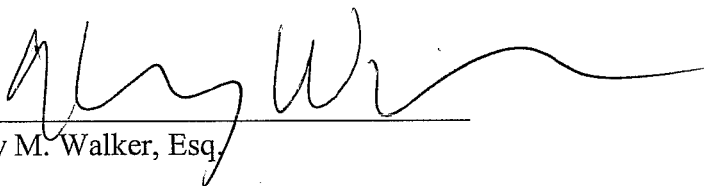
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*Attorney for BLC Management, LLC d/b/a  
Angles Communication Solutions*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been delivered, via U.S. Mail, to the following on this the 30 day of April, 2007:

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

  
Henry M. Walker, Esq.