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September 14, 2007

VIA HAND DELIVERY

filed electronically in docket office on 09/14/07

Hon. Eddie Roberson, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

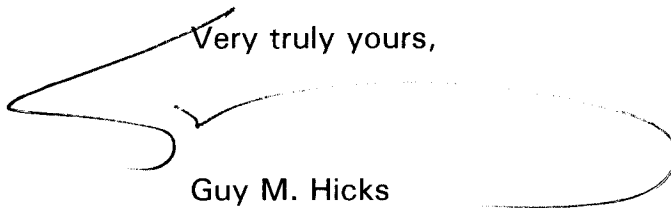
Re: *Global Connection Inc. of America Petition for Designation as an  
Eligible Telecommunications Carrier*  
Docket No. 07-00106

Dear Chairman Roberson:

Enclosed are the original and four copies of AT&T Tennessee's *Petition to Intervene* in the referenced matter,

Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

IN RE:        *PETITION OF GLOBAL CONNECTION INC. OF TENNESSEE FOR  
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER*

Docket No. 07-00106

**PETITION OF AT&T TENNESSEE  
FOR LEAVE TO INTERVENE**

Pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, BellSouth Telecommunications, Inc. dba AT&T Tennessee ("AT&T") petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

1. AT&T Tennessee is engaged in furnishing telecommunications service in the state of Tennessee.

2. Global Connection Inc. of Tennessee ("Global") alleges that it is authorized to furnish telecommunications service in the state of Tennessee.

3. Global seeks Authority approval as an Eligible Telecommunications Carrier ("ETC") "... throughout its licensed service area, including areas served by BellSouth ...".<sup>1</sup>

4. AT&T has an interest in this proceeding. Global's request for ETC designation appears deficient and inconsistent with actions the Authority has taken, including actions taken in the rulemaking proceeding the Authority convened

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<sup>1</sup> See Global's *Petition for Designation as Eligible Telecommunications Carrier in the State of Tennessee ("Petition")*, at p. 1-2.

(Docket No. 05-00284) to address various matters related to ETC designations. For example, although Global claims it will comply with all Authority requirements, Global does not appear to have an approved Lifeline or LinkUp tariff in Tennessee. Moreover, Global's *Petition* states that Global seeks designation as an ETC for "the wire centers of BellSouth", yet Exhibit A to Global's *Petition* indicates that Global seeks ETC designation for "BellSouth", "Verizon", and "Sprint" exchanges.<sup>2</sup> Additionally, although Exhibit E appears to be a list of exchanges for which Global seeks ETC designation from the Authority, the Exhibit is confusing. For example, the Exhibit includes a list of exchanges from several states, including Georgia and Alabama.

5. Global's *Petition* states that "[A]s BellSouth is a non-rural ILEC, there is no need to conduct a public interest analysis."<sup>3</sup> The FCC stated in its ETC Order that "... we find that before designating an ETC, we must make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier."<sup>4</sup>

6. Global's *Petition* simply does not provide sufficient information for the Authority or AT&T to determine whether or not the *Petition* complies with Authority requirements. AT&T will review Global's responses to the Staff's

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<sup>2</sup> See *Petition* at 1-3 and Exhibit A.

<sup>3</sup> See Global's *Petition* at Section IV. See page 11 of *Petition*. The pages of Global's *Petition* are not numbered.

<sup>4</sup> See *In the Matter of High-Cost Universal Service Support Federal-State Joint Board on Universal Service*, Recommended Decision, Adopted April 26, 2007, Released May 1, 2007, WC Docket No. 05-337, CC Docket No. 96-45.

pending Data Requests and will determine (from AT&T's perspective) whether sufficient information has been provided.

7. AT&T's legal interests may be determined in the proceedings and AT&T's interests will not be adequately represented unless the Authority allows AT&T to intervene.

8 No procedural schedule has been set. Allowing AT&T to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

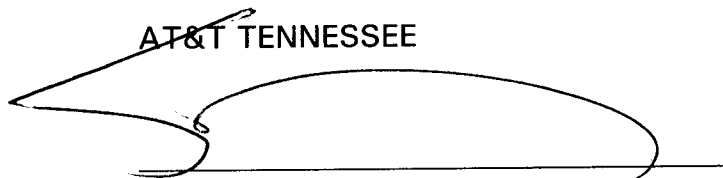
8. AT&T respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

WHEREFORE, AT&T prays:

1. That it be permitted to intervene in this proceeding and participate as a party.
2. That the Authority appoint a hearing officer to set a procedural schedule.
3. That AT&T have such other and further relief to which it may be entitled.

Respectfully submitted,

AT&T TENNESSEE

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large, sweeping loop.

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Joelle Phillips  
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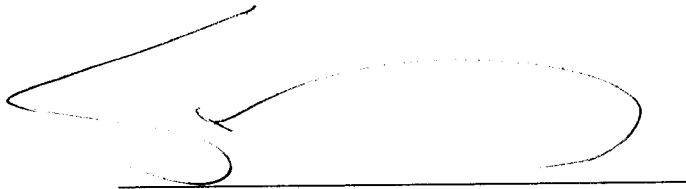
Robert Culpepper  
675 W. Peachtree St., NE, Suite 4300  
Atlanta, GA 30375

## CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2007, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight
- ☐ Electronic

Mr. Houssam Abdallah  
Global Connection Inc.  
P. O. Box 48269  
3957 Pleasantdale Rd  
Atlanta, GA 30340

A handwritten signature in black ink, appearing to be 'Houssam Abdallah', is written over a horizontal line.