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

September 19, 2007

filed electronically in docket office on 09/19/07

Chairman Eddie Roberson  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: United Telephone-Southeast, Inc. d/b/a Embarq's Petition to Intervene  
Docket No. 07-00106

Dear Chairman Roberson:

Please find enclosed an original and three (3) copies of United Telephone-Southeast, Inc. d/b/a Embarq'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 stamp it "Filed" and return to me in the enclosed self-addressed stamped envelope.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely yours,

Edward Phillips

HEP:sm

Enclosures

cc: Parties of Record

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 Global Connection Inc.  
of Tennessee for Designation as an  
Eligible Telecommunications Carrier

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)      Docket No. 07-00106  
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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 (“ILEC”) in the State of Tennessee and provides comprehensive telecommunications services to customers located in Northeast Tennessee.

2.      Global Connection Inc. of Tennessee (“Global”) seeks designation as a competitive eligible telecommunications carrier (“CETC”) “throughout [Global’s] licensed service area”<sup>1</sup> in the State of Tennessee. Embarq has a direct interest in how Global seeks to provide service as a CETC and, as a result will be directly impacted by Global’s designation as a CETC.

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<sup>1</sup> See Global’s Petition for Designation as an Eligible Telecommunications Carrier (ETC) pursuant to 47 U.S.C. 214(e) (“Global’s Petition”) at p. 1.

3. As a certificated ILEC in the State, Embarq is an interested party and has a direct and material interest in the issues to be addressed and resolved by the Authority in this Docket. Specifically, Global has not only stated it is seeking designation throughout its licensed service area and that of BellSouth, Global has also stated in Exhibit A that the territory will also include Verizon's and Sprint's exchanges "as shown and defined in the Incumbent LEC's current and effective tariffs."<sup>2</sup> Since Global refers to Sprint as an ILEC, it must be inferred that the reference is to Embarq. As a consequence of Global's request for certification as a CETC in Embarq's territory, Embarq will be impacted by the decision of the Authority in this matter.

4. In addition, Embarq notes that Global's request for CETC designation may be deficient and inconsistent with the Authority's actions taken in Docket No. 05-00284, in which the Authority adopted rules that address the various matters related to designation as an eligible telecommunications carrier. After review of Global's Petition, it appears that although Global states it will comply with all Authority requirements, it appears that Global does not have an approved Lifeline or Linkup tariff in Tennessee, which is one of the requirements for certification.

5. Embarq also notes that in determining whether Global should be granted CETC status, the Authority must make an affirmative determination that such designation is in the public interest for the citizens of Tennessee. With relevant information lacking, this determination will be impossible to make until additional support is provided by Global. Embarq's participation in this matter as a party may help bring some of that information to the Authority through the discovery process.

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<sup>2</sup> See Global's Petition at pages 1 - 3 and Exhibit A.

6. Finally, Embarq notes that Global has failed to file Tennessee specific information with respect to the exchanges in which it seeks ETC designation, and rather, Global has filed information pertaining to exchanges for BellSouth in Georgia and Alabama.<sup>3</sup> As a result, Embarq respectfully requests that the Authority hold this matter in abeyance until Global amends its filing with the appropriate information.

7. 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.

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

9. Moreover, since no procedural schedule has been set, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by granting the requested intervention.

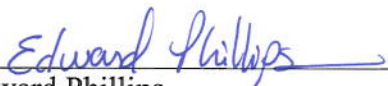
WHEREFORE, based on the foregoing, Embarq respectfully requests that the Authority grant this Petition and permit Embarq to become a full party of record in this docket; that the Authority also appoint a hearing officer to set a procedural schedule; hold the matter in abeyance until Global supplements its application with Tennessee specific information and grant Embarq any further relief to which it may be entitled.

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<sup>3</sup> See Exhibit E to Global's Petition.



Respectfully submitted this 19<sup>th</sup> day of September, 2007.

  
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Edward Phillips  
Attorney  
United Telephone-Southeast, Inc. d/b/a Embarq  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, North Carolina 27587-5900  
Telephone: 919-554-7870  
FAX: 919-554-7913  
Email: edward.phillips@embarq.com  
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. d/b/a Embarq upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.


Houssam Abdallah, President  
Global Connection Inc. of Tennessee  
P. O. Box 48269  
3957 Pleasantdale Road  
Atlanta, GA 30340

R. Dale Grimes  
Ross I. Booher  
BASS, BERRY & SIMS, PLC  
AmSouth Center  
315 Deaderick Street, Suite 2700  
Nashville, TN 37238-3001

Guy M. Hicks  
Joelle Phillips  
AT&T Tennessee  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

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

This 19<sup>th</sup> day of September, 2007.

  
\_\_\_\_\_  
Edward Phillips  
United Telephone-Southeast, Inc. d/b/a Embarq