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October 9, 2007

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

VIA ELECTRONIC DELIVERY

**Re: Application of Jackson Energy Authority to Expand Its
Certificate of Public Convenience and Necessity to Provide
Intrastate Telecommunications Services—Docket No. 07-00201.**

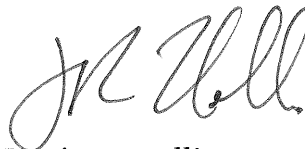
Dear Chairman Roberson:

Please find the original and 5 copies of the Petition for Leave to Intervene filed on behalf of the Tennessee Cable Telecommunications Association in the referenced matter enclosed herewith. Accompanying this filing is a check in the amount of \$25.00 to cover the applicable filing fee. Please file-stamp a copy for our records.

If I may be of further assistance, please do not hesitate to contact me. I am

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC



Jamie R. Hollin

Enclosures

Cc: Stacey B. Briggs, Esq.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

October 9, 2007

IN RE:

**APPLICATION OF JACKSON ENERGY
AUTHORITY TO EXPAND ITS CERTIFICATE
OF PUBLIC CONVENIENCE AND NECESSITY
TO PROVIDE INTRASTATE
TELECOMMUNICATIONS SERVICES**

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Docket No. 07-00201

**PETITION OF THE TENNESSEE CABLE TELECOMMUNICATIONS
ASSOCIATION FOR LEAVE TO INTERVENE**

The Tennessee Cable Telecommunications Association ("TCTA"), by and through undersigned counsel, hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene pursuant to Tenn. Code Ann. § 4-5-310, Tenn. Code Ann. § 65-2-107, and Tenn. Comp. R. & Regs. 1220-1-2-.08 in the referenced proceeding. In support of this petition, TCTA respectfully states the following:

1. The TCTA is a trade organization whose membership consists primarily of owners and operators of franchised cable television systems throughout the state of Tennessee.
2. Certain TCTA members either hold a Certificate of Public Convenience and Necessity ("CCN") to provide telecommunications services statewide or intend to make application to provide services statewide or in various locales throughout the state as permitted by law.
3. The Jackson Energy Authority ("JEA"), subject to certain conditions, was issued a CCN by the Authority to provide facilities-based telecommunication services as a carriers'

carrier (on a wholesale delivery basis) to competitive local exchange carriers within Madison County, Tennessee.¹

4. The JEA now seeks “an expansion of its CCN to include the provision of retail services to end use customers throughout the State of Tennessee....”²

5. As certificated entities authorized to provide telecommunications services, or potential telecommunications service providers, TCTA’s legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and TCTA’s interests will not be adequately represented unless it is allowed to intervene.

6. TCTA’s participation will not impair the interests of justice or the orderly and prompt conduct of the Authority’s proceeding.

7. TCTA seeks to intervene and participate as its interests may appear.

WHEREFORE, PREMISES CONSIDERED, the TCTA prays that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, including, without limitation, to file comments in order to assist the Authority’s deliberations, to participate in the hearing, to cross-examine witnesses, and otherwise protect the interests of TCTA and the public interest. Additionally, TCTA requests to receive copies of any notices, orders, or any other documents filed herein, and have such other, further and general relief as the justice of their cause entitle them to receive.

¹ See Order Approving Application for Certificate of Public Convenience and Necessity, *In Re: Application of Jackson Energy Authority for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunications Service*, Docket No. 03-00438, dated March 5, 2004.

² See Application, p. 4, ¶ 2.

Respectfully submitted,

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By:



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Certificate of Service

I hereby certify that a true and correct copy of the foregoing has been placed in the U.S. mail, postage pre-paid, on this the 9th day of October, 2007 to the following:

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