



Guy M. Hicks
General Counsel

AT&T Tennessee
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

T: 615.214.6301
F: 615.214.7406
guy.hicks@att.com

September 21, 2007

Filed electronically in docket office 9/21/2007

VIA HAND DELIVERY

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

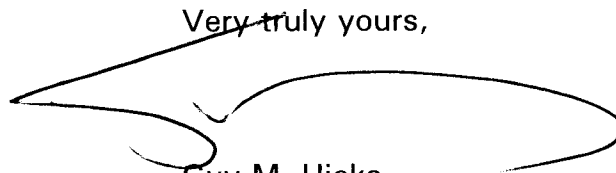
Re: *Level 3 Communications LLC's Tariff Filing to Revise TRA Tariff No. 3*
(Tariff No. 2007388)
Docket No. 07-00219

Dear Chairman Roberson:

Enclosed are the original and four copies of AT&T Tennessee's *Petition to Intervene and Request for Suspension of Tariff of Level 3 Communications, LLC*.

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: *Level 3 Communications LLC's Tariff Filing to Revise TRA Tariff No. 3
(Tariff No. 2007388)*

Docket No. _____

PETITION TO INTERVENE OF AT&T TENNESSEE
AND REQUEST FOR SUSPENSION OF TARIFF
OF LEVEL 3 COMMUNICATIONS, LLC

COMES NOW, AT&T Tennessee on behalf of itself and the subsidiaries and affiliates of AT&T Inc. that are certificated in Tennessee (hereinafter collectively "AT&T"),¹ and files this Petition to Intervene and Request for Suspension of Tariff in this proceeding regarding Level 3 Communications, LLC's ("Level 3") proposed revisions to its Tennessee Regulatory Authority ("Authority") Tariff No. 3, filed on September 12, 2007.

AT&T requests leave to intervene in the above-referenced docket pursuant to Tenn. Code Ann. §§ 65-4-104, 65-4-117 and 4-5-310 and Authority Rules 1220-1-2-.02 and 1220-1-2-.08. In support of its request, AT&T shows the following:

1. AT&T is authorized to provide local and long distance telecommunications services in Tennessee.
2. On or about September 12, 2007, Level 3 filed tariff revisions, which by their terms are not effective until October 15, 2007. If permitted to become

¹ The following entities, in addition to BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee, are certificated to provide services in Tennessee and are wholly owned, indirect subsidiaries of AT&T Inc.: AT&T Communications of the South Central States, LLC; TCG Midsouth, Inc; SBC Long Distance, LLC d/b/a AT&T Long Distance; SNET America, Inc. d/b/a SBC Long Distance East; and BellSouth Long Distance Inc. d/b/a AT&T Long Distance Service.

effective, Level 3's proposed revision to Tariff No. 3 may adversely affect AT&T operations in Tennessee.

3. According to its cover letter of September 12, 2007, Level 3 proposes to add three new services: Toll Free Data Base Access Service, Toll Free Transit Traffic Service and Pay Telephone Compensation. New rates for Originating Access service are also proposed.

4. The tariffs for these proposed new services are vague and ambiguous. The filing contains virtually no description or explanation of the services and fails to define key terms describing the services. It is unclear when the proposed services apply or how and in what circumstances the rates will be applied. Such ambiguity and lack of clarity prohibit the determination as to whether the proposed new services and rates are appropriate, reasonable, and in the public interest. Level 3 has made similar filings in other states, including Ohio, where the Ohio Public Utility Commission suspended the filing.

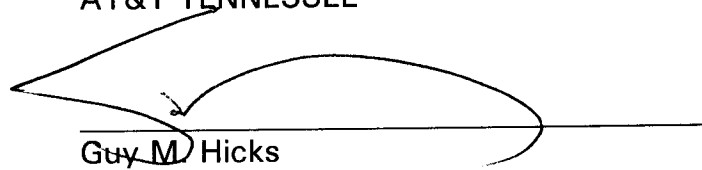
5. The resolution of this matter will affect AT&T's rights, privileges, and duties, which cannot be adequately protected by any other party. AT&T companies pay Level 3 both originating and terminating intrastate switched access rates on intrastate interexchange calls placed by their customers. AT&T companies have a significant financial interest in ensuring that Level 3's intrastate switched access rates are lawful and appropriate. AT&T should be allowed to intervene as a party.

6. The Authority has jurisdiction over Level 3's proposed tariff. Level 3's proposed tariff should be suspended pending the outcome of the Authority's review.

WHEREFORE, AT&T respectfully asks the Authority to grant its intervention and suspend Level 3's tariff pending further proceedings.

Respectfully submitted,

AT&T TENNESSEE

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

Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301

Robert A. Culpepper
675 W Peachtree Street NW, Suite 4300
Atlanta, Georgia 30375-0001

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2007, a copy of the foregoing document was served on the following, via the method indicated:

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

Gregg Strumberger, Esquire
Level 3 Communications, LLC
1025 Eldorado Blvd
Broomfield, CO 80021
gregg.strumberger@level3.com

A handwritten signature in black ink, appearing to read 'Gregg Strumberger', is written over a horizontal line.