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November 28, 2007

HAND DELIVERY

Honorable Eddie Roberson, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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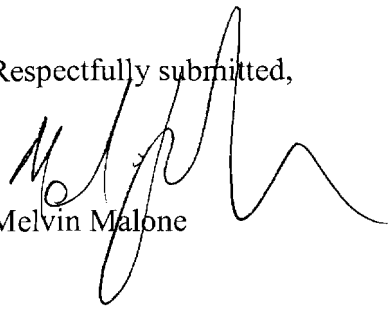
**RE: IN RE: CITIZENS TELECOMMUNICATIONS COMPANY OF
TENNESSEE'S PROPOSED TARIFF NO. 20070432 TO GENERAL
CUSTOMER SERVICES TARIFF REGARDING CHARGES FOR
WIRELESS/VoIP ENHANCED 911 SERVICE, TRA DOCKET NO. 07-
00253**

Dear Chairman Roberson:

Enclosed for filing are the original and thirteen (13) copies of substitution pages to *Sprint Nextel's Complaint And Petition For Leave To Intervene* in the above-captioned matter. Please substitute the attached pages 5 and 6 for pages 5 and 6 filed in *Sprint Nextel's Complaint And Petition For Leave To Intervene* on November 14, 2007.

An additional copy of the foregoing is attached to be "file-stamped" for our records. If you have any questions or require additional information, please let me know.

Respectfully submitted,


Melvin Malone

c: Parties of Record

10. Tenn. Code Ann. § 65-4-122(c) provides that it shall be unlawful for a common carrier or public service company “to subject any particular person, company, firm, corporation . . . , or any particular description of traffic or service to any undue or unreasonable prejudice or disadvantage.” Because Citizens is seeking to charge wireless and/or VoIP providers for cost recovery that should be borne by other parties, the proposed application of the charge to wireless and/or VoIP providers violates this statute.

11. Tenn. Code Ann. § 65-4-123 provides, in part, that “the regulation of telecommunications services and telecommunications services providers shall protect the interests of consumers without unreasonable prejudice or disadvantage to any telecommunications services provider[.]” Citizens proposed application of the charges to wireless and VoIP carriers constitutes unreasonable prejudice and disadvantage for those telecommunications services providers because they are not responsible for such charges pursuant to FCC rules.

12. Tenn. Code Ann. § 65-4-115 provides, in part, that “No public utility shall adopt, maintain, or enforce any regulation, practice, or measurement which is unjust, unreasonable, unduly preferential or discriminatory[.]” The proposed application of the charges to wireless and VoIP carriers constitutes a regulation that is unjust, unreasonable, and unduly discriminatory because those carriers are not responsible for such charges pursuant to FCC rules. Therefore, the proposed application of the charges violates this statute.

13. Until certain delineated determinations are made by the agency, Authority Rule 1220-4-8-.13(4) requires Incumbent Enhanced 911 Emergency Service Providers to provide for fair and equitable agreements based on the Incumbent Enhanced 911 Service Provider billing the Emergency Communications District for its portion of the Enhanced 911 service as provided for

in the tariffs, and the other service providers billing the ECD for their portions of the Enhanced 911 service. Assuming the aforementioned determinations have not been made, the proposed tariff revisions would violate this rule by permitting Citizens to circumvent its obligation to offer fair and equitable agreements and instead attempt to force wireless and VoIP providers through its tariff to pay an Enhanced 911 charge for which they are not responsible.

14. If permitted to become effective, the proposed revisions will directly and adversely affect Petitioners' operations in the State of Tennessee. Specifically, Sprint Nextel would incur costs that should be borne by other parties under FCC rules.

15. Petitioners' legal rights, duties, privileges, immunities or other legal interests will be determined in this proceeding and cannot be adequately protected by any other party.

16. Because of their direct interest in this proceeding, Petitioners respectfully seek intervention rights, the convening of a contested case, and suspension of the proposed revisions until the conclusion of a contested case.

17. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing Petitioners' requests.

18. As demonstrated herein, based on long-settled FCC decisions and rules, Sprint Nextel has a substantial likelihood of prevailing on the merits of this Complaint.

WHEREFORE, Sprint Nextel respectfully requests that the Authority:

- (A) Suspend the proposed tariff revisions on or before November 16, 2007: decline to permit the same to become effective on November 16, 2007: and convene a contested case proceeding regarding the proposed revisions to Citizens Telecommunications Company of Tennessee's General Customer Services Tariff; or