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November 28, 2007

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

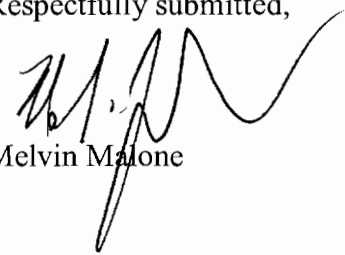
**RE: IN RE: CITIZENS TELECOMMUNICATIONS COMPANY OF
TENNESSEE'S PROPOSED TARIFF NO. 20070432 TO GENERAL
CUSTOMER SERVICES TARIFF REGARDING CHARGES FOR
WIRELESS/VoIP ENHANCED 911 SERVICE, TRA DOCKET NO. 07-
00253**

Dear Chairman Roberson:

Enclosed for filing are the original and thirteen (13) copies of substitution pages to *Verizon Wireless' Complaint And Petition For Leave To Intervene* in the above-captioned matter. Please substitute the attached pages 4 and 5 for pages 4 and 5 filed in *Verizon Wireless' Complaint And Petition For Leave To Intervene* filed electronically on November 15, 2007, and filed via hand delivery on November 16, 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

determined that this cost is not the responsibility of wireless carriers, and Citizens must not be allowed to simply ignore federal law.

9. Tenn. Code Ann. § 65-4-124(a) provides, in part, that “All telecommunications services providers shall provide non-discriminatory interconnection to their public networks under reasonable terms and conditions[.]” The proposed monthly administrative charge on wireless carriers for maintenance and operation of the Selective Router would amount to unreasonable terms and conditions and therefore violates this statute.

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 providers for cost recovery that should be borne by other parties, the proposed application of the charge to wireless providers violates this statute.

11. 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 carriers constitutes a regulation that is unjust, unreasonable and unduly discriminatory because wireless carriers are not responsible for such charges. Therefore, the proposed application of the charges violates this statute.

12. 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 Revisions* would violate this rule by permitting Citizens to circumvent its obligation to offer fair and equitable agreements and to force wireless providers to pay an Enhanced 911 charge for which they are not responsible.

13. If permitted to become effective, the *Proposed Revisions* will directly and adversely affect Petitioner's operations in the State of Tennessee.

14. For the reasons set forth herein, the TRA should reject Citizens' unlawful *Proposed Revisions*.

15. The Petitioner's requests are consistent with the public interest, which is served by ensuring that charges for tariffed services are applied in a just, reasonable and nondiscriminatory manner. The *Proposed Revisions* are against the public interest and thus harmful to both Tennessee's competitive environment and its consumers.

16. Petitioner's legal rights, duties, privileges, immunities or other legal interests will be determined in this proceeding.

17. Because of its direct interest in this proceeding, Petitioner respectfully seeks intervention rights, the convening of a contested case, and suspension of the *Proposed Revisions* until the conclusion of a contested case.

18. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing Petitioner's requests.

19. As demonstrated herein, based on long-standing FCC decisions, Petitioner has a substantial likelihood of prevailing on the merits of this Complaint.