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June 20, 2008

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

filed electronically in docket office on 06/20/08

Re: Public Record Request by the Consumer Advocate and Protection Division of the
Office of the Attorney General – Docket No. 07-00269

Dear Chairman Roberson:

United Telephone Southeast LLC (“Embarq”) is in receipt of the above-referenced public records request made by the Consumer Advocate and Protection Division of the Office of the Attorney General (“Consumer Advocate”) filed on June 13, 2008. After reviewing the request made by the Consumer Advocate, Embarq wishes to respond.

The Consumer Advocate’s public records request involves two separate inquiries. First, is the request by the Consumer Advocate to obtain “[a]ll consumer complaints in possession of the Tennessee Regulatory Authority” concerning Embarq “from 2006 through June 13, 2008.” This is a very broad request and is not limited to directory assistance; however, it is my understanding that the request is an attempt to obtain information pertaining to any possible directory assistance complaints. So long as the Consumer advocate limits the use of any information obtained by this request to directory assistance, then such request appears to be consistent with the Hearing Officer’s ruling made on June 5, 2008. Nevertheless, if the Consumer Advocate seeks to introduce evidence obtained from this request not related to directory assistance complaints, then Embarq reserves the right to object at that time.

The Consumer Advocate’s second public records request is to obtain “any information that shows the number of Lifeline consumer/subscribers” in the State seems to be far-a-field from any relationship to the sole remaining issue to be disposed of in this proceeding – namely, whether one directory assistance call allowance is appropriate for Embarq’s Tennessee consumers. However, recognizing the authority granted under Tenn. Code Ann. § 65-4-118(b)(2), Embarq only wishes to reserve its rights to object, on any applicable grounds – including relevancy, to the use of “Lifeline consumer/subscriber information” by the Consumer Advocate in this matter.

Please do not hesitate to contact me with any questions concerning this matter.

Sincerely,

Edward Phillips

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COUNSEL

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HEP:sm