

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: UNITED TELEPHONE-SOUTHEAST INC. d/b/a EMBARQ
CORPORATION TARIFF FILING TO INCREASE RATES IN
CONJUNCTION WITH THE APPROVED 2007 ANNUAL PRICE CAP
FILING**

DOCKET NO. 07-00269

**REBUTTAL TESTIMONY
OF
TERRY BUCKNER**

August 1, 2008

1 **Q. Please state your name for the record.**

2 A. My name is Terry Buckner.

3

4 **Q. What is the purpose of your testimony?**

5 A. The purpose of my testimony is to rebut the direct
6 testimony of Mark C. Hunter, who filed testimony on behalf of
7 United Telephone - Southeast ("UTSE"), Inc. d/b/a Embarq
8 Corporation ("Embarq") as to the appropriate number of
9 directory assistance ("DA") call allowances.

10

11 **Q. What are your issues with Embarq's testimony.**

12 A. Embarq's arguments for reduced DA call allowances rest
13 on two premises: (1) anti-competitiveness and (2) inequality¹.

14

15 **Q. Please discuss your issue with the anti-competitive argument.**

16 A. Anti-competitive practices can be defined as business or
17 government practices that prevent or restrain competition in a
18 market and include, but are not limited to the following: (1)
19 "dumping", which is the practice of intentionally losing money
20 on each sale in the short run in order to reduce competition or

¹Embarq Direct Testimony, M. Hunter, page 14, lines 10-12.

1 render it impossible; (2) “barriers to entry”, which are designed
2 to avoid competition that new entrants would bring; (3) “price
3 fixing”, which is “any action by two or more firms to cooperate
4 in setting prices²”; (4) “resale price maintenance”, which
5 prohibits or restrains resellers to set prices independently of the
6 wholesale provider that also competes in the retail market; (5)
7 “absorption”, which is the practice of one competitive firm
8 swallowing a competitive firm in order to reduce competition;
9 and (6) “tariff protection”, which insulates firms from
10 competitive forces. Embark’s current level of DA call
11 allowances is not anti-competitive and does not meet any of the
12 anti-competitive practices described above, but instead is a
13 competitive advantage. Embark cites two competitors, Charter
14 Communications (“Charter”) and Bristol Tennessee Essential
15 Services (“BTES”), which offer no local DA “call allowances to
16 its customers generally.³” Embark concludes that because the
17 two competitors “generally” charge for all local DA calls, it is
18 anti-competitive to Embark: “On its face, yes, the situation is

²*Microeconomics*, Dolan Lindsey, The Dryden Press: New York, 1988; page 509.

³Embark Direct Testimony, M. Hunter, page 9, lines 11-12.

1 anti-competitive.⁴ However, the CAPD contends that
2 Embarq's use of DA service in a price comparative is too
3 narrow. Consumers do not select their telecommunications
4 provider on DA pricing alone. Attached is a CAPD exhibit,
5 which shows a comparison of rates for a typical residential
6 customer. The result indicates that current prices for monthly
7 residential service and 3 local DA calls for Embarq (\$17.50) are
8 significantly lower than Charter (\$28.74) and slightly higher
9 than BTES (\$16.45).

10 Therefore, using price as a comparative for the same level
11 of residential services for the three competitive
12 telecommunication companies, Embarq has a competitive
13 advantage over one company and a slight price disadvantage
14 for the other. This is hardly indicative of an anti-competitive
15 situation. Embarq's anti-competitive argument is without
16 merit.

17 Furthermore, as previously written in this docket,
18 Embarq has wide latitude on the pricing of its services and its
19 costs of services. Indeed, it may charge whatever price it
20 deems appropriate for DA services, notwithstanding, the

⁴Embarq Direct Testimony, M. Hunter, page 9, line 16.

1 number of DA call allowances established in this docket. True
2 competition for telecommunication services should drive prices
3 downward, rather than the “all boats rise together” pricing
4 initiative of Embarq.

5
6 **Q. Please discuss your issue with the inequality argument.**

7 A. Embarq claims it is being treated unfairly by the TRA on
8 this matter when compared “to the treatment the Authority has
9 already afforded AT&T.”⁵ Yet, historically, there has always
10 been asymmetry in the prices, costs, types, and providers of
11 telecommunication services in Tennessee. Today, a review of
12 the telecommunications map in Tennessee reflects much of the
13 state is served by many non AT&T incumbent local exchange
14 (“ILEC”) telecommunication providers. However, Embarq
15 wants to be treated the same as AT&T as a matter of TRA
16 policy. This policy treatment strays far from the historic
17 economic and business reasons that resulted in multiple ILECs
18 and their present rates in Tennessee. Once more, in the CAPD
19 exhibit is a comparison of AT&T residential rates and three
20 local DA calls for communities contiguous with Embarq’s

⁵Embarq Direct Testimony, M. Hunter, page 10, lines 14-15.

1 service territory: (1) Morristown (Hamblen County); (2)
2 Newport (Cocke County); and (3) Rogersville (Hawkins
3 County). As a result, Embarq's current monthly price of \$17.50
4 for this level of service is considerably higher than AT&T in
5 Morristown, (\$13.03), in Newport (\$12.44), and Rogersville
6 (\$12.44).

7 Therefore, a DA call allowance policy that is identical to
8 AT&T would not be in the public interest and would further
9 widen the disparity in value of service between AT&T and
10 Embarq.

11 The inequality argument that should be addressed is the
12 fact that the same telecommunications company, Embarq, can
13 currently provide three free DA call allowances in the city of
14 Bristol, Virginia, but only one in Bristol, Tennessee under
15 Embarq's proposed tariff.

16 Embarq's inequality argument is without merit.
17

18 **Q. Please summarize your testimony.**

19 A. As a matter of public policy, the proposed reduction in
20 DA allowances from three to one for Embarq should be denied
21 by the TRA. The proposed reduction is not in the public

1 interest. Embarq's anti-competitive and inequality arguments
2 are without merit. Indeed, Embarq's proposed tariff would
3 create inequality for ratepayers literally across the street from
4 one another.

5 Therefore, the TRA should deny Embarq's proposed DA
6 call allowance reduction in this docket.

7
8 **Q. Does this conclude your testimony?**

9 **A.** Yes, it does.

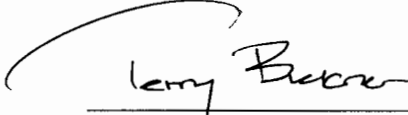
BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: UNITED TELEPHONE-SOUTHEAST INC. d/b/a EMBARQ
CORPORATION TARIFF FILING TO INCREASE RATES IN
CONJUNCTION WITH THE APPROVED 2007 ANNUAL PRICE CAP
FILING

DOCKET NO. 07-00269

AFFIDAVIT

I, Terry Buckner, Regulatory Analyst, for the Consumer Advocate Division of the
Attorney General's Office, hereby certify that the attached Rebuttal Testimony represents
my opinion in the above-referenced case and the opinion of the Consumer Advocate
Division.



TERRY BUCKNER

Sworn to and subscribed before me
this 18th day of Aug., 2008.


NOTARY PUBLIC



My Commission Expires AUG. 23, 2011

My commission expires: Aug. 23, 2011

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: UNITED TELEPHONE-SOUTHEAST INC. d/b/a EMBARQ
CORPORATION TARIFF FILING TO INCREASE RATES IN
CONJUNCTION WITH THE APPROVED 2007 ANNUAL PRICE CAP
FILING**

DOCKET NO. 07-00269

**EXHIBITS
OF
TERRY BUCKNER**

August 1, 2008

OFFICE OF THE ATTORNEY GENERAL - STATE OF TENNESSEE
CONSUMER ADVOCATE AND PROTECTION DIVISION
RATE COMPARATIVE
EMBARQ - TRA DOCKET #08-00039

EXHIBIT

	<u>Embarq</u>	<u>Charter</u>	<u>BTES</u>
Residential rate	\$ 17.50 A/	\$ 24.99 B/	\$ 14.95 D/
3 Local DA calls	\$ -	\$ 3.75 C/	\$ 1.50 E/
Total Monthly Bill	\$ 17.50	\$ 28.74	\$ 16.45

A/ Tariff section U3.3.1, page 3.

B/ Tariff No. 1, section 4.1, page 31.

C/ Tariff No. 1, section 4.3, page 33 (\$1.25 times 3).

D/ Tariff No. 1, section 7.2.1, page 60.

E/ Tariff No. 1, section 8.4, page 76 (\$.50 times 3).

OFFICE OF THE ATTORNEY GENERAL - STATE OF TENNESSEE
CONSUMER ADVOCATE AND PROTECTION DIVISION
AT&T RATE COMPARATIVE
EMBARQ - TRA DOCKET #08-00039

EXHIBIT

	<u>Embarq</u>	<u>AT&T</u>
Morristown		
Residential rate	\$ 17.50 A/	\$ 10.03 B/
3 Local DA calls	\$ -	\$ 3.00 C/
Total Monthly Bill	\$ 17.50	\$ 13.03
Newport		
Residential rate	\$ 17.50 A/	\$ 9.44 D/
3 Local DA calls	\$ -	\$ 3.00 C/
Total Monthly Bill	\$ 17.50	\$ 12.44
Rogersville		
Residential rate	\$ 17.50 A/	\$ 9.44 E/
3 Local DA calls	\$ -	\$ 3.00 C/
Total Monthly Bill	\$ 17.50	\$ 12.44

A/ Tariff section U3.3.1, page 3.
B/ Tariff section A3.7.1, page 25.
C/ Tariff section A3.13.3, page 54.1 (\$1.50 times 2).
D/ Tariff section A3.7.1, page 26.
E/ Tariff section A3.7.1, page 26.1.

GENERAL SUBSCRIBER SERVICES TARIFF

UNITED TELEPHONE-SOUTHEAST, INC.
TENNESSEE

Thirty-Fourth Revised Page 3
Cancels Thirty-Third Revised Page 3

ISSUED: November 19, 2007
BY: Manager - Tariffs
Overland Park, Kansas

EFFECTIVE: December 19, 2007

U3. BASIC LOCAL EXCHANGE SERVICE

U3.3 MONTHLY EXCHANGE RATES (Cont'd)

U3.3.1 FLAT RATE SERVICE (Cont'd)

All Exchanges ⁽¹⁾

	<u>Dial Access Line Rates</u> ⁽²⁾			(T)
<u>Business</u>	<u>Flat</u>	<u>LMS</u>	<u>RBS</u>	
Individual Line	\$39.95	\$29.95	N/A	(I)
Key Trunk	65.95	50.95	N/A	(I)
PBX Trunk	65.95	50.95	N/A	(I)
Toll Terminals	39.95	N/A	N/A	
Rotary Line Service	65.95	50.95	N/A	(I)
Payphone Line ⁽³⁾	See Section 7 for rates			(T)
<u>Residence</u>				
Individual Line	\$17.50	\$16.09	\$9.11	(I)
Key Trunk	30.95	N/A	N/A	
Rotary Line Service	30.95	21.51	N/A	(I)

⁽¹⁾ As of 1/1/95, Blountville business rates are appropriate for Basic Local Exchange Service provided to Tri-City Airport.

⁽²⁾ Includes Touch-Tone Service. (T)

⁽³⁾ Rates for Payphone Line Service (PLS) are specified in Section 7 of this tariff. (T)

N/A = Not Available (N)

4.1 Basic Service (Rates – Residential Service) Continued

Service Name	Monthly Charge
Basic Service	\$ 24.99 for one primary line - no calling features included
Lifeline Program	\$ 5.99 monthly recurring charge for one primary line – no calling features included
Additional Line	\$ 8.99 per line – no calling features included, limit one residential additional line per account

4.2 Custom Calling Features

Name	Description	Monthly Charge	
Anonymous Call Rejection	Allows subscribers to reject calls from numbers that have private or anonymous designation and route to an announcement	\$ 1.50	
Call Forward	Provides four types of forwarding capabilities:		
Selective	1) Forwards list up to 12 selected Incoming calls to a designated number	\$ 2.75	
Variable	2) Forwards all incoming calls to a Designated number	\$ 2.75	
Busy	3) Forwards all incoming calls when Line is busy	\$ 2.75	
Busy/No Answer	4) Forwards all incoming calls when Line is busy or unanswered	\$ 2.75	
Call Return (Note 1)	Provides the telephone number of the Last incoming call and offers the option To return the call by dialing *69 (Available IntraLATA calls only)	\$ 3.25 or \$.90 per use (Note 2) \$ 9.00 per mo. Maximum	(C) (I) (I)
Repeat Dialing (Note 1)	Auto Redials a specified busy outgoing Number by dialing *66 (Available IntraLATA calls only)	\$1.75 or \$.90 per use (Note 2) \$ 9.00 per mo. Maximum	(C) (I) (I)

Note 1: As of March 23, 2008 the monthly rate for this feature will be unavailable to customers who don't currently subscribe to the feature. Existing customers who currently subscribe to this feature on an individual basis will be grandfathered and allowed to retain this feature until:
The customer submits a request to the Company to change existing service;
Non-pay disconnection of telephone service; or Customer is notified by the Telephone Company that the grandfathered service has been discontinued

Note 2: Credits will not be given for attempts to complete interstate or interLATA calls

(N)
|
(N)

Issue Date: February 22, 2008

Effective Date: March 23, 2008

Issued By: Betty Sanders, Director Regulatory Affairs
12405 Powerscourt Drive, St. Louis, MO 63131
Charter Fiberlink-Tennessee, LLC

Charter Fiberlink-Tennessee, LLC
Local and Intrastate Interexchange Services Tariff

TRA Tariff No. 1
8th Revised Page 33
Cancels 7th Revised Page 33

4.3 Other Services and Charges

Name	Description	Charge	
Suspension Service	Allows a telephone account to remain active while suspending service for 3 - 6 consecutive months (Only one time per calendar year)	\$ 15.00 per number per month	
Non-Listed Number	Number listed with Directory Assistance but not in the telephone directory	\$ 2.00 per number, per month	
Non-Published Number	Number not listed with Directory Assistance or in the telephone Directory	\$ 2.50 per listing per month	
Operator Services	Operator dialed calls to a specific called number, collect, person or station	\$ 1.10 per use	
Directory Assistance	Directory 411 Operator Assisted Calls Directory Assistance for certified Physically Impaired	\$ 1.79 per use No Charge	
Block Collect Calls	Prevent the acceptance of collect Calls	N/C	
Block Third Party Calling	Prevent third party calling	N/C	
Block International Calling	Prevents international calling	N/C	
Busy Line Interrupt	Operator Assisted Interruption of a busy line	\$ 20.00 per use	
Busy Line Verify	Operator assisted verification of a busy line	\$ 20.00 per use	
Extended Referral Message	Extends the length of disconnect intercept message from 30 to 60 days	\$ 2.00	
Directory Listing Change	Change to Directory Listing	\$ 5.00	
Add/Change Feature	Add or remove a feature	\$ 5.00 (one change per order)	
Telephone Number Change	Change telephone number	\$ 20.00 per change	
Returned Check/Non Sufficient Fund Charge	Fee assessed for forms of payment returned or declined	\$ 25.00	
Preferred Carrier Freeze	Local and Long Distance carrier freeze	N/C	
Toll Restriction	Block long distance calling originating from a specified telephone line	N/C	(M) (M)

Issue Date: April 8, 2008

Effective Date: May 8, 2008

Issued By: Betty Sanders, Director Regulatory Affairs
12405 Powerscourt Drive, St. Louis, MO 63131
Charter Fiberlink-Tennessee, LLC

SECTION 7 - LOCAL SERVICES PRICE LIST, (CONT'D.)**7.2 Residential Line (Cont'd)****7.2.1 Monthly Recurring Charges**

The following charges apply to a Basic Residential Line each month. Rates and charges include Touch-tone Service for each line. The rates and charges below apply to service provided on a month-to-month basis and allows the Customer unlimited (local, non-toll) calling to all exchange access lines within the Customer's local calling area as defined in Paragraph 3.1. Rates for additional Features can be found in Section 7.7.2 of this tariff. Descriptions of the Optional Packages can be found in Section 5 of this Tariff.

Basic Residential Line	\$14.95
Options (Rate in addition to cost of Basic Residential Line)	
Five Feature Bundled Residential Line, add	\$7.95
Ten Feature Bundled Residential Line, add	\$13.95

7.2.3 Non-Recurring Charges

Non-recurring charges apply to each line installed for the Customer. Non-recurring charges are contained in Section 4 of this tariff. All such charges will appear on the next bill following installation of the service.

7.2.4 Optional "BTES Area Calling" Residential Plan

Residential Customers who subscribe to a Residential Line service may also subscribe to BTES Area Calling. For a flat monthly fee the Customer has unlimited calling within the LATA. This is only available where Company has the necessary facilities and ability to offer this service. This service is for voice use. Customers may not utilize this service for data, dial-up internet access or other similar uses. The company reserves the right to immediately discontinue this optional calling plan when abuse is suspected. When this occurs, the Company will make every reasonable effort to immediately contact and notify the Customer. When this occurs, the Customer will not loose service but will be billed at regular rates specified in the Company's Tariff #2.

BTES Area Calling, Monthly Fee	\$11.95
--------------------------------	---------

SECTION 8 - DIRECTORY ASSISTANCE AND LISTING SERVICES, (CONT'D.)**8.4 Directory Assistance**

A Directory Assistance charge applies per local directory assistance call. The Customer may make two (2) requests for a telephone number per call. The Directory Assistance Charge applies regardless of whether the Directory Assistance operator is able to supply the requested number. Rates and charges for intraLATA and interLATA Directory Assistance service are provided in the Company's Tennessee Tariff No. 2.

Each Local Directory Assistance Call, Residential Customers	\$0.50
Each Local Directory Assistance Call, Business Customers	\$0.50
Directory Assistance Call Completion	\$0.55

An allowance of six (6) inquiries per month at no cost shall be allowed to residential Customers who are 65 years of age or older. The Customer must request this allowance by notifying the Company. This allowance becomes effective immediately following the request from the Customer. Should the Company exercise its option to seek verification, the allowance will become effective retroactive to the date of request.

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE
ISSUED: October 10, 2007
BY: President - Tennessee
Nashville, Tennessee

GENERAL SUBSCRIBER SERVICES TARIFF

Nineteenth Revised Page 25
Cancels Eighteenth Revised Page 25

EFFECTIVE: November 1, 2007

A3. BASIC LOCAL EXCHANGE SERVICE**A3.7 Monthly Exchange Rates (Cont'd)****A3.7.1 Flat Rate Service (Cont'd)****A. (Cont'd)****1. Exchange (Cont'd)**

Mascot-Strawberry Plains

		Residence	Business	USOC	
(a)	R. G. 5	\$13.30	\$43.01	NA	(I)
	Maynardville				
(a)	R. G. 4	12.98	43.01	NA	(I)
	McEwen				
(a)	R. G. 1	8.46	34.20	NA	(I)
	McKenzie				
(a)	R. G. 2	9.44	34.59	NA	(I)
	Medina				
(a)	R. G. 2	9.44	34.59	NA	(I)
	Memphis Metro				
(a)	R. G. 5	13.30	43.01	NA	(I)
	Michie				
(a)	See A3.10.6	10.00	36.11	NA	
	Middleton				
(a)	R. G. 2	9.44	34.59	NA	(I)
	Milan				
(a)	R. G. 2	9.44	34.59	NA	(I)
	Morristown				
(a)	R. G. 3	10.03	38.25	NA	(I)
	Moscow				
(a)	R. G. 5 (Tennessee Only)	13.30	43.01	NA	(I)
(b)	R. G. 1 (Mississippi Only)	8.46	34.20	NA	(I)

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE

GENERAL SUBSCRIBER SERVICES TARIFF

Eighteenth Revised Page 26
Cancels Seventeenth Revised Page 26

ISSUED: October 10, 2007
BY: President - Tennessee
Nashville, Tennessee

EFFECTIVE: November 1, 2007

A3. BASIC LOCAL EXCHANGE SERVICE**A3.7 Monthly Exchange Rates (Cont'd)****A3.7.1 Flat Rate Service (Cont'd)****A. (Cont'd)****1. Exchange (Cont'd)****Newport**

		Residence	Business	USOC	
(a)	R. G. 2	\$9.44	\$34.59	NA	(l)
	Normandy				
(a)	R. G. 3	10.03	38.25	NA	(l)
	Norris				
(a)	R. G. 4	12.98	43.01	NA	(l)
	North Spring Hill				
(a)	R. G. 5	13.30	43.01	NA	(l)
	Oak Ridge				
(a)	R. G. 4	12.98	43.01	NA	(l)
	Old Hickory				
(a)	R. G. 5	13.30	43.01	NA	(l)
	Oliver Springs				
(a)	R. G. 4	12.98	43.01	NA	(l)
	Palmyra				
(a)	R. G. 3	10.03	38.25	NA	(l)
	Paris				
(a)	R. G. 2	9.44	34.59	NA	(l)
	Petersburg				
(a)	R. G. 3	10.03	38.25	NA	(l)
	Pleasant View				
(a)	R. G. 5	13.30	43.01	NA	(l)
	Portland				
(a)	R. G. 5	13.30	43.01	NA	(l)

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE

GENERAL SUBSCRIBER SERVICES TARIFF

Sixteenth Revised Page 26.1
Cancels Fifteenth Revised Page 26.1

ISSUED: October 10, 2007
BY: President - Tennessee
Nashville, Tennessee

EFFECTIVE: November 1, 2007

A3. BASIC LOCAL EXCHANGE SERVICE**A3.7 Monthly Exchange Rates (Cont'd)****A3.7.1 Flat Rate Service (Cont'd)****A. (Cont'd)****1. Exchange (Cont'd)**

Pulaski

			Residence	Business	USOC	
	(a)	R. G. 2	\$9.44	\$34.59	NA	(I)
Ridgely						
	(a)	R. G. 1	8.46	34.20	NA	(I)
Ripley						
	(a)	R. G. 1	8.46	34.20	NA	(I)
Rockwood						
	(a)	R. G. 4	12.98	43.01	NA	(I)
Rogersville						
	(a)	R. G. 2	9.44	34.59	NA	(I)

A3. BASIC LOCAL EXCHANGE SERVICE

A3.13 Directory Assistance Service

This service is a Flex-Price service and is regulated under terms and conditions as described in A2.3.26 of this Tariff.

A3.13.1 General

- A. The Company furnishes Directory Assistance service for the purpose of aiding customers in obtaining telephone numbers.
- B. When the Company receives a request for Directory Assistance service and the caller provides a state, city and name, the Company will either:
 1. provide the listed and available telephone number(s) requested, or
 2. apprise the caller that the number(s) cannot be provided because the listing(s) is private (non-published), or not available in BellSouth's database.
- C. Directory Assistance does not provide telephone numbers associated with private (non-published) listings but does furnish numbers for semi-private (non-listed) listings.

A3.13.2 Application of Rates, Exemptions and Call Allowances

- A. No charge applies for the first call per billing period month requesting listing information for lines located within the state of Tennessee. This call allowance applies per individual subscriber line, MultiServ service line, MultiServ PLUS service line, BellSouth Centrex service line, PBX trunk line or dormitory communication station line or for the first call per month per ESSX service line or Digital ESSX service line.

This call allowance is not transferable between separate accounts, even for the same customer. A call allowance unused during the monthly billing period will not be credited for application to a Directory Assistance call made in a later billing period.

- B. Subscribers who have applied for and received Company certification that either the subscriber or a person living at the subscriber's residence on a permanent basis is unable to use a telephone directory due to a visual or physical disability which can be confirmed by a physician, appropriate group, or agency are exempt from charges for Directory Assistance calls when requesting listing information for lines located within the Company's NPA/LATA Directory Assistance serving area for the originating line. Written confirmation must be provided to the Company for this exemption to apply. Application procedures may be obtained by calling the local business office.

This exemption is applicable exclusively to calls made by the individual certified to be visually or physically disabled from the subscriber line assigned to the subscriber who has applied for and received such Company certification, or in the case of a business employing disabled persons, from the line assigned to that individual. Usage will be monitored by the Company and is subject to review and investigation. Certification will be verified periodically. Confirmed, inappropriate use of this exemption could result in its removal.

- C. Residence subscribers who have applied for and received Company certification that either the subscriber or a person living at the subscriber's residence on a permanent basis is 65 or more years of age are exempt from Directory Assistance charges when requesting listing information for lines located within the Company's NPA/LATA Directory Assistance serving area for the originating line. Written confirmation must be provided to the Company for this exemption to apply. Application procedures may be obtained by calling the local business office.

This exemption is applicable exclusively to calls made by the individual certified to be 65 or more years of age from the residential subscriber line assigned to the subscriber who has applied for and received such Company certification. Usage will be monitored by the Company and is subject to review and investigation. Certification will be verified periodically. Confirmed, inappropriate use of this exemption could result in its removal.

A3.13.3 Rates And Charges

- A. Directory Assistance service - (maximum of two listing requests per call)

1. Receipt of listings associated with lines located within the Local Calling Area or NPA/LATA serving area of the originating line

(a) Per call¹

Rate
\$ 1.50

USOC
NA

(1)

2. Receipt of listings associated with lines located outside the NPA/LATA serving area of the originating line and within the state of Tennessee

(a) Per call¹

1.50

NA

(1)

Note 1: Rate change to be implemented during normal billing cycles beginning *July 1, 2008*.

(C)

BELLSOUTH
TELECOMMUNICATIONS, INC.
TENNESSEE
ISSUED: May 9, 2008
BY: President - Tennessee
Nashville, Tennessee

GENERAL SUBSCRIBER SERVICES TARIFF

Sixth Revised Page 54.1.1
Cancels Fifth Revised Page 54.1.1

EFFECTIVE: June 2, 2008

A3. BASIC LOCAL EXCHANGE SERVICE

A3.13 Directory Assistance Service (Cont'd)

A3.13.3 Rates And Charges (Cont'd)

- A. Directory Assistance service - (maximum of two listing requests per call) (Cont'd)
3. Receipt of listings associated with lines located outside the state of Tennessee

	Rate	USOC	
(a) Per call ¹	1.99	NA	(1)
B. Directory Assistance for Mobile Service Providers (MSPs)			
1. All calls to Directory Assistance			
(a) Per call	.30	NA	

Note 1: Rate change to be implemented during normal billing cycles beginning *July 1, 2008*. (C)