

Voice | Data | Internet | Wireless | Entertainment



Embarq  
Mailstop: NCWKFR0313  
14111 Capital Boulevard  
Wake Forest, NC 27587  
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August 1, 2008

Chairman Tre Hargett  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

filed electronically in docket office on 08/01/08

Re: Rebuttal Testimony of witness Mark C. Hunter on behalf of United Telephone Southeast LLC

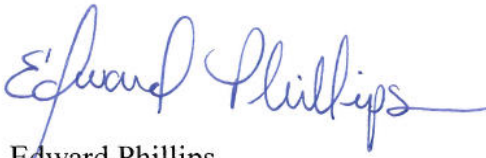
Docket No. 07-00269

Dear Chairman Hargett:

Please find enclosed for filing in the above-referenced docket the original and four (4) copies of Rebuttal Testimony of witness Mark C. Hunter along with supporting exhibits on behalf of United Telephone Southeast LLC. Information marked as **confidential** is being filed under seal with this letter in a separate envelope and should be afforded protection consistent with the Protective Order. Embarq has already filed the enclosed Rebuttal Testimony electronically; however, this letter is the required follow-up to that filing.

An extra copy of this letter is enclosed. Please stamp it "Filed" and return to me in the enclosed self-addressed stamped envelope. Finally, please do not hesitate to contact me if you have any questions.

Sincerely yours,



Edward Phillips

HEP:sm

Enclosures

cc: Consumer Advocate and Protection Division

Edward Phillips  
COUNSEL  
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## NASHVILLE, TENNESSEE

United Telephone-Southeast, Inc. d/b/a  
Tariff Filing to Increase Rates in  
Conjunction With the Approved 2007  
Annual Price Cap Filing

Docket No. 07-00269

**MARK C. HUNTER**

**August 1, 2008**



1 **Q. The Consumer Advocate’s briefs<sup>1</sup> in this docket have asserted that Embarq, AT&T**  
2 **and Citizens Telecom are “vastly” different in terms of service area and number of**  
3 **customers served and has suggested that the Tennessee Regulatory Authority**  
4 **(“Authority”) may reasonably require different local directory assistance**  
5 **allowances based upon these differences. Has the Consumer Advocate, either in**  
6 **discovery or in its direct testimonies, further supported this assertion?**

7 **A.** No. In its discovery of the Consumer Advocate (First Set, Question 8), Embarq  
8 specifically asked the Consumer Advocate to explain the differences between the  
9 Tennessee price regulated incumbent companies and to articulate the nexus between any  
10 relevant differences and a policy of differing local directory assistance allowance among  
11 the incumbents. The Consumer Advocate’s response was merely to assert that the  
12 “agency has the authority to take these differences into account when setting D.A. policy  
13 if it chooses to do so.” Moreover, the Consumer Advocate’s witnesses in this docket do  
14 not mention the assertion or support it in their direct testimonies.

16 **Q. What is the Connected Tennessee survey that Consumer Advocate witness Chrysler**  
17 **has introduced into this docket?**

18 **A.** The Connected Tennessee survey is a telephone survey of Tennessee residents taken  
19 during July 2007 that collected information concerning Tennessee residential consumers’  
20 computer ownership and access to the Internet by region and numerous demographic  
21 factors. The Connected Tennessee survey report, titled “Technology Assessment of

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<sup>1</sup> *Brief of the Consumer Advocate in Response to the Request of the Hearing Officer* filed January 31, 2008 at page 9 and *Response of the Consumer Advocate to Embarq’s Petition for Appeal of the Hearing Officer’s Initial Order* filed at pages 10-11, 18.



1 Tennessee Residential Consumers, September 2007,” as well as a January 2008 update,  
2 are attachments to witness Chrysler’s direct testimony.

3  
4 **Q. Does the Connected Tennessee survey that Consumer Advocate witness Michael D.**  
5 **Chrysler introduced with his direct testimony support the Consumer Advocate’s**  
6 **assertion?**

7 **A.** No. The Connected Tennessee survey does not support differing requirements for  
8 Embarq and AT&T with regard to local directory assistance calling allowances.

9  
10 **Q. What does a survey concerning the percentage of Tennessee residential consumers**  
11 **who own a computer or have Internet access have to do with local directory**  
12 **assistance?**

13 **A.** Embarq’s discovery responses to the Consumer Advocate (First Set, Question 23) and my  
14 direct testimony at pages 11-12 in this docket show that numerous alternative sources of  
15 local directory assistance exist. A number of these alternative sources require access to  
16 the Internet. While acknowledging that “the Internet is a viable alternative to finding  
17 residential and business listings,” witness Chrysler goes on to assert that this “does not  
18 mean that all Tennesseans can forgo traditional telephone services such as directory  
19 assistance.” (Chrysler Direct at A-9). Witness Chrysler explains this is because not  
20 everyone has access to the Internet, noting specifically that “while there is increasing  
21 penetration for alternatives to technology and technology-driven information, the harsh  
22 reality continues to remain that many, many subscribers remain very much dependant on

1 traditional, familiar, and oftentimes life-enabling and enhancing offerings like DA.”  
2 (Chrysler Direct at A-10).  
3

4 **Q. Is witness Chrysler’s depiction of the current market for alternative local directory**  
5 **assistance services accurate?**

6 **A.** No. The information Embarq provided in this docket shows that the Internet is not the  
7 only alternative source of local directory assistance. Many of the providers of free local  
8 directory assistance over the Internet also offer their service using 1-800 numbers.  
9 Anyone with a phone can access 1-800 services, making computer ownership and  
10 Internet access unnecessary. The Consumer Advocate dismisses the existence of all but  
11 one of these totally free 1-800 alternatives and ignores AT&T’s 1-800-Yellowpages (1-  
12 800-935-5697) for both residential, business and government listings, Google’s 1-800-  
13 Goog411 (1-800-466-4411) for business numbers and Microsoft’s Live Search 411 1-  
14 800-CALL-411 (1-800-225-5411) for business numbers.  
15

16 **Q. Is there anything in the Connected Tennessee survey that points to significant**  
17 **differences between Embarq, AT&T and Citizens Telecom that might be relevant in**  
18 **this docket?**

19 **A.** No. While the Connected Tennessee survey data is collected by region and county, it  
20 does not track the local telephone service providers of respondents so comparison among  
21 providers is not possible.  
22

1 **Q. How does the Consumer Advocate use the Connected Tennessee survey then?**

2 **A.** The Consumer Advocate would like to leave the impression that Embark's traditional  
3 service area is significantly different than other areas of Tennessee. Specifically,  
4 Consumer Advocate witness Chrysler complains that the counties included in Embark's  
5 traditional serving area are below the statewide averages for computer ownership and  
6 Internet access per the Connected Tennessee survey.

7  
8 **Q. Does the Connected Tennessee survey show that Embark's traditional service area is**  
9 **significantly different regarding computer ownership and Internet access than other**  
10 **areas of Tennessee?**

11 **A.** No. I have included at **Exhibit MCH-5** a summary of the seven counties Embark serves  
12 (Sullivan, Washington, Carter, Greene, Unicoi in full and Hawkins and Johnson in part)  
13 along with the percentages of residential respondents the Connected Tennessee July 2007  
14 survey found (i) own a computer, (ii) have access to the Internet at home and (iii) have  
15 broadband access at home. The exhibit shows that Embark's urban counties are at the  
16 statewide averages while its more rural counties lag behind those averages. What the  
17 Consumer Advocate's direct testimony leaves out is that this pattern is true for all areas  
18 of the state and not just Embark's traditional service territory. As far as broadband  
19 adoption rates in the July 2007 survey, only 19 of Tennessee's 95 counties meet or  
20 exceed the statewide broadband adoption average. Six of Tennessee's seven urban  
21 counties (including Sullivan) beat the statewide average but only three of Tennessee's 67  
22 rural counties are above the average. Of the middle urban/rural counties, 11 of 21



1 Tennessee counties so classified (including Washington) are above the statewide  
2 average.<sup>2</sup>

3  
4 **Q. What else does the Connected Tennessee survey show about Embarq's traditional**  
5 **serving area?**

6 **A.** The slide at page 34 of the July 2007 survey explains that 75% of Tennessee residents  
7 statewide use the Internet from home or some other place. The map is broken out by  
8 Area Development Districts. The Area Development District that includes Embarq's  
9 traditional service territory<sup>3</sup> surveyed a highly comparable 72% on this question.  
10 Moreover, the January 2008 Connected Tennessee survey update shows a dramatic  
11 relative gains in rural computer ownership and Internet and broadband adoption in only a  
12 six month period, although specific county results were not provided.

13  
14 **Q. Does the Connected Tennessee survey provide justification for differentiating**  
15 **between Embarq and AT&T as to the number of local directory assistance call**  
16 **allowances they should be required to provide?**

17 **A.** No. The Connected Tennessee survey contains no information about specific providers.  
18 The Consumer Advocate nevertheless presses the survey into service by assuming  
19 Embarq serves all customers in its traditional service area. However, upon inspection the  
20 survey data does not reveal significance differences between Embarq's traditional service  
21 area and other areas of the state. Moreover, because AT&T serves such a large number

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<sup>2</sup> See [http://www.connectedtn.org/\\_documents/ResidentialSurveyOverview-FINAL.pdf](http://www.connectedtn.org/_documents/ResidentialSurveyOverview-FINAL.pdf) at pages 2-3, 8.

<sup>3</sup> The First Tennessee district includes the seven counties that make up Embarq' traditional service territory in addition to Hancock County. See <http://ftdd.org/>



1 of Tennessee customers, one must assume that AT&T, as compared to Embarq, has a  
2 larger absolute number of those customers the Consumer Advocate has characterized as  
3 “not so abundantly blessed” with computer ownership or Internet access (Chrysler Direct  
4 at A-15). Based on computer ownership and Internet access, there is no justification for  
5 the Consumer Advocate to make Embarq a focus of its concerns.  
6

7 **Q. How did the Authority consider computer ownership and Internet access when it**  
8 **granted AT&T’s local directory assistance tariff in Docket No. 06-00232?**

9 **A.** The Authority’s order in the case stressed the increased overall connectivity of consumers  
10 in general. “While some telephone numbers are not available in the printed directory  
11 today,” the Authority’s order states, “the evolving dynamics of the communications  
12 environment enables many, if not most, consumers to obtain subscribers’ telephone  
13 numbers, not available in the printed directory, by alternative modes.” The Authority  
14 noted various Internet engines but also cited that “ever expanding bases of consumers  
15 have cellular telephones and electronic mail addresses (e-mail) by which they can be  
16 contacted in the event of a change to their landline telephone number.” The Authority  
17 concluded that “these expanding avenues of communication facilitate the acquisition of  
18 landline telephone numbers, and reduce dependency on DA for the procurement of  
19 telephone numbers that are not in the printed directory.”<sup>4</sup> (Emphasis Added). Upon this  
20 basis, the Authority approved AT&T’s reducing its local directory assistance calling  
21 allowances from three to one.  
22

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<sup>4</sup> Order Granting BellSouth Tariff No. 2006-00431, dated April 17, 2007 at page 10.

1 **Q. Consumer Advocate witness Terry Buckner at page 6 of his direct testimony**  
2 **compares Embarq's local directory assistance calling allowances in Tennessee with**  
3 **several Southeastern states. Is this comparison accurate?**

4 **A.** As far as it goes, but additional comparisons show that Embarq provides no local  
5 directory assistance calling allowances in Kansas, Minnesota, Nebraska, Nevada, Ohio,  
6 Pennsylvania, Texas and Wyoming.<sup>5</sup> Even witness Buckner's review of Embarq's  
7 Southeastern states shows that Embarq provides no calling allowances in Florida.

8  
9 **Q. Consumer Advocate witness Terry Buckner states at page 7 of his direct testimony**  
10 **that the proposed reduction in directory assistance call allowances would create an**  
11 **inequality for Embarq's Tennessee ratepayers when compared to most of their**  
12 **Southeastern peers. Witness Buckner complains that the disparity would be no**  
13 **more evident than in the Cities of Bristol, where the state boundary between**  
14 **Tennessee and Virginia literally runs down State Street. Is witness Buckner's**  
15 **concern well founded?**

16 **A.** No. Witness Buckner fails to recognize that Bristol Tennessee Essential Service (BTES)  
17 is already providing telephone service in Bristol, Tennessee. BTES offers no local  
18 directory assistance call allowances and a limited exemption for customer over 65 years  
19 of age or older. Charter Communications also provides no calling allowances to its  
20 customers and an exemption only for disabled customers. Charter Communications'  
21 Tennessee provides local telephone service in ten of Embarq's Tennessee exchanges,  
22 including Bristol, Tennessee.

23  

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<sup>5</sup> See Consumer Advocate's First Set of Discovery Request to Embarq, Question 29.

1 **Q. Are you aware of any evidence that consumers are reacting negatively to BTES'**  
2 **failure to offer local directory assistance calling allowances at a level comparable to**  
3 **Embarq?**

4 **A.** No, the fact is the evidence suggests that BTES is having no trouble attracting new  
5 customers despite its lack of local directory assistance calling allowances and  
6 exemptions. An article in *Telephony Online* dated April 14, 2008 regarding the two  
7 Bristol municipal fiber-to-the-home systems relates how the Bristol Virginia Utilities  
8 (BVU) triple-play system has a 65% penetration rate inside Bristol, Virginia. Regarding  
9 the situation in Bristol, Tennessee the BTES' general manager is quoted in the article as  
10 saying:

11 Right now, today we have almost 25% penetration, but we have areas where we  
12 have been out there a little longer that we have over 50% penetration.... We are  
13 quickly bringing up the distribution system. We have now passed 27,000 homes.  
14 The original plan was to pass 20,000 in four years. We are hooking people up as  
15 fast as we want to, based upon the fact that we want to serve every customer  
16 really well. If we did some advertising, we could bring in a lot more customers in  
17 a hurry.<sup>6</sup>  
18

19 **Q. What is the situation in Virginia with regard to local directory assistance calling**  
20 **allowances?**

21 **A.** There are several items the Authority should note with regard to local directory assistance  
22 calling allowances in Virginia.

- 23 • First, the Virginia State Corporation Commission (SCC) treats local telephone  
24 exchange providers equally by requiring incumbents and competitive providers  
25 alike to offer three local directory assistance calling allowances a month. The  
26 requirement dates back to 1990. Included at **Exhibit MCH-6** are copies of

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<sup>6</sup> See [http://telephonyonline.com/mag/telecom\\_fiber\\_beat\\_pulses/](http://telephonyonline.com/mag/telecom_fiber_beat_pulses/)



1 Bristol Virginia Utilities' and Charter Communications' Virginia tariffs for local  
2 directory assistance.

- 3 • Second, late last year the SCC found that Verizon's provision of local directory  
4 assistance service is a competitive offering throughout the state. (Case No. PUC-  
5 2007-0008).
- 6 • Third, the Virginia Telecommunication Industry Association (VTIA) has recently  
7 filed a petition with the SCC to abolish the three local directory assistance call  
8 allowances a month requirement for all local telephone providers. (Case No.  
9 PUC-2008-00046).

10  
11 **Q. Consumer Advocate witness Buckner at page 9 and 10 of his direct testimony says**  
12 **that Embarq is not financially harmed by being required to provide three local**  
13 **directory assistance calling allowances. Do you agree?**

14 **A.** No. Overall, Embarq's earnings, in general or with regard to a particular service, have no  
15 place in this docket because Embarq is a price regulated company pursuant to Tenn. Code  
16 Ann. §65-5-109. However, the Consumer Advocate persists in its unfounded belief that  
17 local directory assistance, a non-basic service, should be an exception to the General  
18 Assembly's policies and rules of price regulation. In discovery Embarq objected to  
19 producing to the Consumer Advocate cost data regarding its provision of local directory  
20 assistance services, but Embarq was overruled by the Hearing Officer.<sup>7</sup> Such being the  
21 case, I have included at confidential **Exhibit MCH-7** an analysis which incorporates this  
22 cost data with the current demand data I provided in my direct testimony at **Exhibit**

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<sup>7</sup> See Consumer Advocate's First Set of Discovery Request to Embarq, Question 34.



1       **MCH-4.**<sup>8</sup> That demand data breaks down Embarq’s local directory assistance inquiries  
2       by those billed, those that were allowances and those that were exemptions. The  
3       resulting analysis shows that Embarq suffers a financial loss on its provision of local  
4       directory assistance services in Tennessee, with the current level of allowances playing a  
5       significant role in this loss.

6  
7       **Q.     Witness Buckner at page 9 of his direct testimony states that “Embarq has wide**  
8       **latitude on the pricing of its services and its costs of services through the Price**  
9       **Regulation mechanism.” Do you agree?**

10      **A.**    No. Embarq’s price regulation plan constrains basic service price increases to no more  
11       than one-half of inflation<sup>9</sup> and non-basic services to full inflation. The Consumer  
12       Advocate has at differing places in this docket been more or less explicit about asserting  
13       the telecommunications industry is a declining cost industry.<sup>10</sup> However, the Consumer  
14       Advocate presents no evidence to support its assertion.

15  
16      **Q.     Consumer Advocate witness Michael D. Chrysler concludes his direct testimony by**  
17       **reviewing Embarq’s public notice and outreach efforts regarding its local directory**  
18       **exemptions. Witness Chrysler’s direct testimony at A-20 complains that Embarq’s**  
19       **community directories for Jonesborough and Mountain City do not include any**  
20       **information pages in the front of the directories. Is this true?**

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<sup>8</sup> Please note a corrected version of Exhibit MCH-4 is attached hereto to rectify a minor labeling issue I discovered after filing my Direct Testimony on July 1, 2008.

<sup>9</sup> Specifically, Tenn. Code Ann §65-5-109(e) constrains Embarq from raising basic service prices by the lesser of (i) one-half of the gross domestic product-price index (or GDP-PI) or (ii) GDP-PI less 2%.

<sup>10</sup> See Consumer Advocate’s Responses to Embarq’s First Set (Question 8).

1    **A.**     This is true, but customers who receive the Jonesborough community directory also  
2            receive the Tri-Cities/Johnson City directory and customers who receive the Mountain  
3            City community directory also receive the Elizabethton directory. The Tri-  
4            Cities/Johnson City and Elizabethton directories include information pages.

5  
6    **Q.**     **Witness Chrysler makes several suggestions regarding how Embarq might better**  
7            **inform its customers about Embarq's local directory assistance exemptions for the**  
8            **disabled and those age 65 and over. What is your reaction to the Consumer**  
9            **Advocate's suggestions?**

10   **A.**     Embarq is reviewing the suggestions made by the Consumer Advocate.

11

12   **Q.**     **Does this complete your rebuttal testimony?**

13   **A.**     Yes.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

In Re:

United Telephone-Southeast, Inc. d/b/a  
Tariff Filing to Increase Rates in  
Conjunction With the Approved 2007  
Annual Price Cap Filing

Docket No. 07-00269

**EXHIBIT MCH-5**

**Summary of Connected Tennessee's July 2007 Survey for Embarq's Traditional Service Area Counties**

| County             | Computer Ownership | Internet Adoption | Broadband Adoption | Classification |
|--------------------|--------------------|-------------------|--------------------|----------------|
| Washington         | 74%                | 69%               | 55%                | Rural/Urban    |
| Statewide Averages | 71%                | 65%               | 43%                |                |
| Sullivan           | 70%                | 64%               | 46%                | Urban          |
| Carter             | 68%                | 61%               | 31%                | Rural/Urban    |
| Hawkins (partial)  | 68%                | 63%               | 30%                | Rural/Urban    |
| Greene             | 65%                | 54%               | 35%                |                |
| Johnson (partial)  | 52%                | 48%               | 21%                |                |
| Unicoi             | 50%                | 40%               | 25%                | Rural/Urban    |



**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

In Re:

United Telephone-Southeast, Inc. d/b/a  
Tariff Filing to Increase Rates in  
Conjunction With the Approved 2007  
Annual Price Cap Filing

Docket No. 07-00269

**EXHIBIT MCH-6**

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LOCAL EXCHANGE COMMUNICATIONS SERVICES

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TITLE PAGE

REGULATIONS AND SCHEDULE OF CHARGES APPLYING TO LOCAL EXCHANGE  
COMMUNICATIONS SERVICES WITHIN THE COMMONWEALTH OF VIRGINIA

This tariff is on file with the Virginia State Corporation Commission (SCC) and can be viewed at their Division of Communications located in the Tyler Building – 9<sup>th</sup> Floor, 1300 East Main Street, Richmond, Virginia 23219. In addition, this tariff is available for review at the Company's principle place of business, Monday – Friday, 9:00 a.m. to 5:00 p.m., local time, located at 15022 Lee Highway, Bristol, Virginia 24202.

Telephone Number 866-835-1288

Issued: April 8, 2004  
By:

Mr. Wesley R. Rosenbalm, General Manager  
P.O. Box 8100  
Bristol, VA 24203-8100

Effective: April 9, 2004

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LOCAL EXCHANGE COMMUNICATIONS SERVICES

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SECTION 3 – DESCRIPTION OF SERVICE, (CONT'D.)

3.3 Directory Assistance

- 3.3.1 The Company shall list each Customer with directory assistance except those numbers not listed at the Customer's request.
- 3.3.2 Local directory assistance service is furnished to Customers who request assistance in determining directory information at the rates set forth in the Rate Section of this Tariff after using the allowance described in 3.3.3 below.
- 3.3.3 There is an allowance of 3 calls per month to directory assistance prior to being charged the per-call rate as set forth in the Rate Section of this Tariff.
- 3.3.4 No credit will be given for any unused portion of the call allowance. No credit will be given for requested listings that are non-published or non-listed. No credit will be given for requested listings that are not found in the Company's directory assistance records.
- 3.3.5 Call allowances are not transferable between separately billed accounts of the same Customer.
- 3.3.6 A Customer is allowed to request two (2) numbers from directory assistance per call.
- 3.3.7 Directory Assistance includes the option for Call Completion. This option provides the Customer the ability to request that the operator place the call on behalf of the Customer. The charge for this option can be found in Section 10.2.2.1. The Customer is responsible for any applicable local or long distance usage charges which may be associated with the completed call.

## LOCAL EXCHANGE COMMUNICATIONS SERVICES

### SECTION 10 – RATES AND CHARGES, (CONT'D)

#### 10.2 Miscellaneous Services, (Cont'd)

##### 10.2.2 Operator Services, Per Call

##### 10.2.2.1 Local Directory Assistance,

|                            | <u>Business</u> | <u>Residential</u> |
|----------------------------|-----------------|--------------------|
| Via Operator *, per call   | \$ 0.58         | \$ 0.58            |
| Direct Dialed *#, per call | \$ 0.29         | \$ 0.29            |

\* Maximum of 2 requested telephone numbers per call  
# billed for calls in excess of the 3 call allowance per month

|                                |        |        |
|--------------------------------|--------|--------|
| Directory Assist/Call Complete | \$0.30 | \$0.30 |
|--------------------------------|--------|--------|

|                           |         |         |
|---------------------------|---------|---------|
| 10.2.2.2 Person-to-Person | \$ 3.00 | \$ 3.00 |
|---------------------------|---------|---------|

|  |         |         |
|--|---------|---------|
| 10.2.2.3 Operator Assistance for Local Calls | \$ 0.50 | \$ 0.50 |
|--|---------|---------|

|   |         |         |
|---|---------|---------|
| 10.2.2.4 Station to Station Operator<br>Assisted other than Customer Dialed<br>Calling Card | \$ 1.55 | \$ 1.55 |
|---|---------|---------|

|                                       |         |         |
|---------------------------------------|---------|---------|
| 10.2.2.5 Customer Dialed Calling Card | \$ 0.60 | \$ 0.60 |
|---------------------------------------|---------|---------|

|                                 |           |           |
|---------------------------------|-----------|-----------|
| 10.2.3 700/900 Blocking Service | No Charge | No Charge |
|---------------------------------|-----------|-----------|

##### 10.2.4 Call Management Features, Monthly Recurring

|   |          |          |     |
|---|----------|----------|-----|
| First feature <sup>1,2</sup>            | \$ 4.00  | \$ 4.00  | (T) |
| Each additional feature <sup>1,2</sup>  | \$ 1.00  | \$ 1.00  |     |
| "Favorite Five" Package <sup>1,2</sup>  | \$ 10.00 | \$ 8.00  |     |
| "Favorite Ten" Package <sup>1,2</sup>   | N/A      | \$ 14.00 | (T) |
| "Enhanced Feature" Package <sup>1</sup> | \$12.00  | N/A      | (N) |
| "Basic Feature" Package <sup>1</sup>    | \$10.00  | N/A      | (N) |

<sup>1</sup> Only available to customers that subscribe to a qualifying service or group of qualifying services from the Company which result in monthly recurring charges which equal or exceed \$44.95 pursuant to Section 11.2.

<sup>2</sup> Does not include Caller ID. See Section 10.3.5.



**REGULATIONS AND SCHEDULE OF CHARGES  
APPLYING TO LOCAL EXCHANGE  
COMMUNICATIONS SERVICES WITHIN  
THE COMMONWEALTH OF VIRGINIA**

**This tariff is on file with the Virginia State Corporation Commission and can be viewed at their Division of Communications located in the Tyler Building – 9<sup>th</sup> Floor, 1300 East Main Street, Richmond, Virginia 23219. In addition, this tariff is available for review at the Company's principle place of business, Monday – Friday, 9:00 AM – 5:00 PM, CST, located at 12405 Powerscourt Drive St. Louis, Missouri 63131**

**(888) 765-9840**

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**Issue Date: January 30, 2006**

**Effective Date: January 31, 2006**

**Issued By: Carrie L. Cox, Director Legal and Regulatory Affairs  
12405 Powerscourt Drive, St. Louis, MO 63131  
Charter Fiberlink VA-CC), LLC**

#### 4. Description of Service and Rates – Section 4 (cont'd.)

##### 4.3 Directory Assistance Services

###### 4.3.1 Directory Assistance Service

The Company furnishes National Directory Assistance Service ("DA") for the purpose of aiding customers in obtaining telephone numbers. Customers are allowed two requests per call. When a party requests assistance in obtaining telephone numbers in the continental United States, the following charge applies.

In order to make allowance for a reasonable need for local calling area DA service, including numbers not in the directory, directory inaccessibility and other conditions, no charge applies for the first three calls per month per access line. The allowance is cumulative for all billed services furnished on the same premises.

Charges for DA are not applicable to calls placed from telephones where the Customer, or a member of the Customer's household, has been affirmed in writing as unable to use a Company provided directory because of a visual, physical or reading handicap.

Directory Assistance Service includes directory assistance call completion which provides a Customer calling Directory Assistance with the option of having the last requested number completed. When a caller requests more than one number from Directory Assistance, directory assistance call completion is offered only for the last number requested. A service message will inform the Customer that he or she may be connected to the requested number automatically.

The use of the call completion feature to complete a long distance call will incur charges at the current Charter long distance rate. Call completion service is furnished over the Telephone Company's network and where facilities are available.

(C)

(C)

Customer Direct Dialed

\$1.79 per call after three free calls

(I)

## CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Rebuttal Testimony of witness Mark C. Hunter on behalf of United Telephone Southeast LLC to the Consumer Advocate and Protection Division's Complaint and Petition to Intervene by depositing a copy in the United States Mail, first-class postage prepaid.

This 1<sup>st</sup> day of August, 2008.

Ryan L. McGehee  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate and Protection Division  
P. O. Box 20207  
Nashville, TN 37202-0207

  
\_\_\_\_\_  
Edward Phillips  
United Telephone Southeast LLC