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March 14, 2008

Mr. Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

filed electronically in docket office on 03/14/08

Re: Petition for Reconsideration of United Telephone-Southeast, Inc. d/b/a
Embarq

Docket No. 07-00269

Dear Chairman Roberson:

Please find enclosed for filing in the above-referenced docket the original and four (4) copies of United Telephone-Southeast, Inc.'s ("Embarq's") Petition for Reconsideration. Embarq has already filed the enclosed petition electronically. This letter is the required follow-up to the electronic filing.

An extra copy of this letter and petition are enclosed. Please stamp the petition and letter as "Filed" and return to me in the enclosed self-addressed stamped envelope. Finally, please do not hesitate to contact me with any questions.

Sincerely yours,


Edward Phillips

HEP:sm

Enclosures

cc: Consumer Advocate and Protection Division

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re:)	
)	
)	
United Telephone-Southeast, Inc. d/b/a)	Docket No. 07-00269
Embarq Tariff Filing to Increase Rates in)	
Conjunction with the Approved 2007 Annual)	
Price Cap Filing)	

PETITION FOR RECONSIDERATION OF MARCH 5, 2008 ORDER

United Telephone-Southeast, Inc. (“Embarq”) petitions the Tennessee Regulatory Authority (“Authority”) for reconsideration of its March 5, 2008 Order pursuant to Tenn. Code Ann. § 4-5-317(a). Embarq’s petition for reconsideration seeks reversal of the Authority’s March 5th Order. Specifically, Embarq seeks reversal of the Authority’s suspension of portions of Embarq Tariff No. 2007-456 concerning Embarq’s proposed directory assistance rate increase and Embarq’s proposed reduction in monthly directory assistance (“DA”) call allowances from three to one and the convening of the contested case proceeding.

As the Authority is aware, with the exception of the lower rate increase, Embarq’s DA Tariff mirrors a BellSouth Telecommunications, Inc. (now AT&T Tennessee) tariff approved by the Authority in Docket No. 06-00232. In failing to approve Embarq’s tariff on December 17, 2007, in light of the Authority’s action in Docket No. 06-00232, the Authority committed error and abused its discretion by treating similarly situated incumbent local exchange carriers in a dissimilar manner. To correct this error the DA

provisions of Embarq Tariff No. 2007-456 should be approved without further delay and the contested case proceeding dismissed.

While Tenn. Code Ann. § 4-5-317(a) requires a petitioning party to state the specific grounds for which relief is requested, Embarq has already set forth those grounds throughout the course of the proceedings in this matter.¹ Specifically, Embarq presented legal argument at the January 3, 2008 status conference setting forth its position that the Authority erred in suspending Embarq's DA rate increase and DA call allowance reductions. In addition, Embarq reiterated the very same legal arguments in its post-status conference brief filed on January 31, 2008 and in its recently filed Petition for Appeal of the Hearing Officer's Initial Order entered on February 14, 2008.²

Since Embarq has already set forth its specific grounds for seeking relief, Embarq wishes to rely on its previously filed pleadings and statements as support for this current petition. Thus, in an effort to preserve any and all rights existing under Tenn. Code Ann. § 4-5-317(a), Embarq submits that this petition incorporates and relies on all the arguments and statements set forth in the oral argument made at the January 3, 2008 status conference, Embarq's post-status conference brief, and Embarq's Petition for Appeal as if the arguments and statements made in those documents and transcript of proceedings were set forth verbatim in this petition.

Based on the pleadings filed by Embarq in this proceeding, including this petition and the oral argument, it is evident that Embarq is entitled as a matter of law to

¹ Embarq has engaged in discussions with the Consumer Advocate and Protection Division, Office of the Attorney General ("Consumer Advocate") and the Hearing Officer in this matter concerning the filing of this Petition for Reconsideration. The Consumer Advocate did not object, and the Hearing Officer agreed that since this matter has proceeded in the fashion that it has, it makes sense to simply file this petition relying on pleadings and arguments already presented in this docket.

² Embarq's Petition for Appeal was filed on February 29, 2008, six days before the release of the Authority's March 5, 2008 Order.

implement its DA rate increase without further delay or suspension by the Authority. Further, Embarq is also entitled to implement its proposed reduction in DA call allowances from three allowances per month to one allowance per month immediately and without the Authority conducting a contested case proceeding. Such action, if taken, is consistent with the treatment afforded BellSouth in Docket No. 06-00232.

Wherefore, Embarq respectfully requests: (1) that the Authority grant its Petition for Reconsideration by reversing its March 5th Order and grant Embarq's Petition for Appeal in reversing the Hearing Officer's Initial Order; and (2) that the Authority permit the portions of Embarq Tariff No. 2007-456 concerning DA services go into effect without further delay.

Respectfully submitted this 14th day of March, 2008.



Edward Phillips

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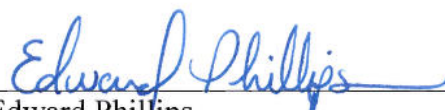
Tennessee B.P.R. No. 016850

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Petition for Reconsideration to counsel listed below by depositing a copy of the same in the United States Mail, first-class postage prepaid, and by electronic transmission to counsel.

This 14th day of March, 2008.

Ryan L. McGehee
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
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Edward Phillips
Attorney
United Telephone-Southeast, Inc.