

September 19, 2008

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#### Via Hand Delivery

Tre Hargett Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

> Re: In Re: Citizens Telecommunications Company of Tennessee, LLC's d/b/a

Frontier Communications of Tennessee

Docket No.: 08-00021

Dear Mr. Hargett:

Enclosed for filing in the above-referenced proceeding is the original and 13 copies of Citizens Telecommunications Company of Tennessee, LLC's Direct Testimony of Angela C. MCall with attached Exhibits 5 and 6 filed under seal.

Should you have any questions, please do not hesitate to call.

Very truly yours,

Adams and Reese, LLP

Charles W. Cook, III

CWC/mlb **Enclosures** 

cc: Stephen R. Butler Ryan L. McGehee Robert E. Coooper

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# BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)	
CITIZENS TELECOMMUNICATIONS	)	No. 08-00021
COMPANY OF TENNESSEE LLC d/b/a	)	
FRONTIER COMMUNICATIONS OF TENNESSEE, LLC	)	
TARIFF TO ESTABLISH DIRECTORY ASSISTANCE	)	
RATES.	)	

#### DIRECT TESTIMONY OF ANGELA C. McCALL

(With Exhibits 5 and 6 filed under seal)

Guilford F. Thornton, Jr. (No.14508)

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing to the Consumer Advocate and Protection Division by depositing a copy in the U.S. Mail to:

Robert E. Cooper, Jr.
Tennessee Attorney General & Reporter
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202

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

On this the 27 day of September, 2008.

Charles W. Cook, III

## DIRECT TESTIMONY OF ANGELA C. McCALL SEPTEMBER 19, 2008

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Q. Please state your name, business address, employer and position.

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A. My name is Angela C. McCall. My business address is 300 Bland Street, Bluefield, WV 24701. I am employed by Citizens Telecom Services Company LLC and support Citizens Telecommunications Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee ("Frontier"). I am employed in the Government and External Affairs department as a State Regulatory Manager.

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Q. Please describe your work experience.

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A. I have been employed by Frontier regulatory affairs area for the last fifteen years. In my current position I am responsible for addressing issues affecting Frontier that arise before the Tennessee Regulatory Authority ("Authority"). I have had Tennessee regulatory responsibilities for most of the last ten years. I am similarly responsible for regulatory matters affecting Frontier in Alabama, Florida, and West Virginia.

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Q. What is the current posture of this docket?

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A. On January 16, 2008 Frontier filed with the Authority, Tariff No. 2008-0021. The tariff sought to charge customers for local directory assistance calls to business and residential customers. Residential customers were to be allowed two free calls per invoice period to the local directory assistance operator. The Consumer Advocate and Protection Division of the Office of Attorney General ("Consumer Advocate") filed a complaint relating to the local directory assistance allowances and petitioned to intervene in the docket on February 5, 2008. The Authority voting panel assigned to the docket at the February 25, 2008, Directors' Conference, suspended the tariff. The Authority's March 19, 2008, Order documenting the conference explained the "panel found that because there is no existing call allowance in Frontier's tariff, meaning that all DA calls are currently free, that suspension of the tariff's provision regarding the call allowance is in the public interest. A majority of the panel further found that because the rate may impact what constitutes an appropriate number of call allowances, a suspension of the tariff provision regarding the proposed rate was also in the public interest. The panel voted to suspend the portion of the tariff regarding the call allowance, and a majority of the panel further voted to suspend the portion of the tariff regarding the proposed rate, pursuant to Tenn. § 65-5-101(c)(3)(iii)(B) for sixty days; to convene a contested case Code Ann. proceeding to evaluate Frontier's proposed DA rate and call allowances; and to appoint the General Counsel or his designee as Hearing Officer to prepare the matter for hearing before the panel.

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Q. Please describe the purpose of your testimony.

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47 Q. Please describe the purpose of your testimony.

A. The Hearing Officer's Initial Report indicated that the parties and the Hearing Officer all believe the number of local directory assistance call allowances is an issue of policy to be decided by the Authority in its discretion. The purpose of my testimony is to aid the Authority with its research and review of Frontier's local directory assistance tariff. My testimony will touch upon the filings Frontier has already made in this docket; however, I would like to also offer important additional evidence concerning the current competitive nature of local directory assistance services and the anticompetitive and discriminatory effects of the Authority having failed to approve Frontier's tariff.

Q. Are you familiar with Frontier's filings in this docket?

60 A. Yes.

Q. What is the basic history of local directory assistance in Tennessee over the last decade?

A. As a general matter, the Authority has not promulgated local directory assistance calling allowance rules applicable to all telecommunication service providers in Tennessee. The Authority has permitted competitive local telecommunication service providers to charge their customers for each and every local directory assistance call with no monthly allowances.

Included at Exhibit 1 of my direct testimony is a simple matrix that lists the various dockets in which the Authority has addressed the local directory assistance calling allowances of price-regulated incumbents. The Authority originally set Embarq's and AT&T's local directory assistance call allowances at six per month with unlimited public interest exemptions for the physically and visually disabled as well as customers age 65 and older (Docket Nos. 96-01423 & 99-00391). In a series of two steps, AT&T reduced its calling allowances from six to three (Docket No. 0400416) and then three to one (Docket o. 06-00232). The AT&T tariff was approved by the Authority before Embarq's current tariff, which provides for three local directory assistance allowances, could be approved by the Authority (Docket No. 0600288). The Consumer Advocate did not oppose Embarq's current tariff when it was filed. Recently, Frontier filed a tariff to establish a rate for local directory assistance (Docket No. 08-00021).

Q. Are there any general requirements that telecommunications service providers in Tennessee offer local directory assistance service and/or a certain number of local directory assistance call allowances?

A. No. When the 1995 General Assembly first enacted Tennessee' policy of local telecommunications competition by passing Public Chapter No. 408, the General Assembly provided at Tenn.Code Ann §65-4-124(b) that all telecommunications service providers who offer basic local exchange telephone service in the state must provide each customer with a white page directory listing, 911 emergency services, free blocking for

900/976 type services and access to telecommunication relay services. There was never any mention of a local directory assistance call allowance. The Authority has relied upon Tenn.Code Ann. §65-4-117(3) to require incumbents to offer call assistance allowances for calls to the directory assistance operator. The Authority has used its discretion under the statute to "fix just and reasonable standards, classifications, regulations, practices or services to be furnished, imposed, observed and followed thereafter by any public utility."

# Q. You mentioned AT&T's tariff in Authority Docket No. 06-00232. What was the issue in that docket and what was the Authority's decision?

A. In docket No. 06-00232, the Authority approved AT&T's tariff to reduce its local directory assistance calling allowances from three to one per month without a contested case. Even more important to note, the Consumer Advocate made no appearance in the AT&T docket.

# Q. Does the Authority's order in AT&T's Docket No. 06·00232 provide an explanation for the Authority decision?

A. Yes. The Authority's discussion of local directory assistance calling allowances in AT&T's Docket No. 06-00232 is extremely broad and is just as applicable to Frontier as it is AT&T. Pages 5-6 of the AT&T docket's *Order Granting BellSouth Tariff No. 2006-0043*, can be summarized as follows:

In 1997 many telephone numbers were not published in the printed directory. Some numbers had been excluded in the printed directory at a subscriber's request (i.e., a non-published listing), and some were inaccurate or did not appear because new numbers were obtained after the directory was printed (e.g., a new customer or customer move). Accordingly, it was necessary that customers call DA in order to obtain telephone numbers for those subscribers whose numbers did not appear in the printed directory but were still available via directory assistance.

Even though some numbers still are not available in the printed directory today, the dynamics of the communications environment enables many allows consumers a multitude of options to obtain subscriber's telephone numbers, i.e. internet search engines. With the ever-increasing popularity of cellular telephones and electronic mail addresses (e-mail), the options by which consumers may obtain telephone numbers only continues to grow and reduce dependency on DA for the procurement of telephone numbers that are not in the printed directory.

The Authority went on to state:

"Further, the majority of BellSouth's competitors have no restrictions on the DA services they offer, including the number of call allowances. In fact, most competing local exchange companies ("CLECs") do not have call allowances and charge for every DA request. BellSouth's consumers are permitted one free DA call per month. Given the

variety of existing methods from which to acquire telephone numbers in today's environment, the Authority finds the tariff reasonable and not adverse to the public interest. BellSouth will continue to provide its DA service at no charge to physically and visually disabled customers, and to customers sixty-five years or older who request an exemption."

# Q. Does Frontier's tariff filing in this docket in any way affect the public interest exemptions for the physically and visually impaired or customer's age 65 or older?

A. Frontier's tariff allows unlimited calls to the DA operator for residential customers who are physically impaired in any manner. However, Frontier's tariff does not allow exemptions based on age because it would be discriminatory. I do not believe that a non-impaired 65-year old customer should receive free services solely because of his or her age. For example, a wealthy 65-year old customer taking service in a vacation home does not need free service compared to a younger customer struggling to support a family.

Frontier is an ILEC in 23 states including Tennessee. For 19 of the 23 states, tariffs have been approved exempting customers from calls to the Directory Assistance Operator who are physically or mentally impaired. No other state has required Frontier to provide free directory assistance calls based on age.

# Q. Do Frontier's major competitors provide local directory assistance calling allowances to its customers?

164 A. Yes. Ben Lomand Communications, Inc. ("Ben Lomand"), Charter Fiberlink-Tennessee, LLC ("Charter") and Comcast Digital Voice Service ("Comcast").

What specifically do the Ben Lomand, Charter, and Comcast tariffs on file with the Authority say?

170 A. The Ben Lomand tariff provides an allowance of 5 free calls per month and exempts customers who are handicapped or blind. See Exhibit 2.

Charter does not offer any free calls and exempts customers who are physically impaired. See Exhibit 3.

Comcast does not offer any free calls and exempts customers who are physically impaired. See Exhibit 4.

Q. So are you saying that the current situation is anti-competitive?

A. On its face, yes, the situation is anti-competitive. The Authority is requiring Frontier to render services at no charge while not requiring its regulated competitors to do the same. The 1995 General Assembly, again as part of Public Chapter No. 408, established price regulation as a way to prepare traditionally rate-of-return regulated incumbents for - and

transition the industry to - a competitive telecommunications environment. The anti-competitive situation as it currently exists is one based upon history and circumstances. However, should the Authority fail to approve Frontier's tariff as filed in this docket, then the anti-competitive situation would not only become aggravated, but would be sanctioned by the direct action of the Authority. Such a failure would also be highly discriminatory against Frontier in relation to the treatment the Authority has already afforded AT&T and Embarq. These facts alone are cause enough for the Authority to find Frontier's tariff is just and reasonable.

Q. The Authority's discussion in AT&T's Docket No. 06-00232 that you quoted above further states that "the evolving dynamics of the communications environment enables many, if not most, consumers to obtain subscribers' telephone numbers, not available in the printed directory, by alternative modes." Is this finding also applicable to Frontier just the same as it is AT&T?

A. Yes. My recent research shows that Frontier's local customers have numerous alternatives for finding telephone numbers. This is aside from the fact that Frontier's customers may be able to choose a different local provider if he or she should find Frontier's provision of directory assistance services to be inadequate.

Q. Does Frontier operate in other states where there are few to no free calls to the Directory Assistance Operator?

A. Yes. Exhibit 5 depicts the percentage of calls allowed to the Directory Assistance Operator for the 23 states where Frontier is an ILEC. This chart shows that only Tennessee out of Frontier's 23 states requires Frontier to provide unlimited free Directory Assistance calls.

Q. What are some of the alternative sources of local directory assistance services available to Frontier's local customers?

A. Frontier provides its customers with a new paper directory approximately once a year. I believe at least one alternative provider of paper directories, Yellowbook, is present in the Tri-Cities. In addition, I mentioned previously that Frontier's wire line customers who subscriber to a wireless carrier could use their wireless phones for directory assistance. But the most astounding part of my research is that there are a multitude of Internet sites and 1-800 providers that do not just offer directory assistance services but offer the service absolutely free!

• Frontier itself provides free residential and business directory assistance via the Internet at <a href="http://www.frontierpages.com/">http://www.frontierpages.com/</a>

• Numberway allows customers to find phone numbers all around the world using the Internet at <a href="http://www.numberway.com/">http://www.numberway.com/</a>

- 231 AT&T provides free directory assistance on the Internet for business and 232 residential http://www.anywho.com/ listings and also at 233 http://www.corp.att.com/directory/. 234 235 Whether using the internet at http://www.free411.com/ 236 or calling 1-800-FREE411 (i.e. 1-800-373-341 I), Jingle Network provides free 237 directory assistance for residential or business telephone numbers. 238 239 AT&T provides free directory assistance for residential and business telephone 240 numbers at 1-800-Yellowpages (i.e. 1-800-935-5697). For details see
  - AT&T also provides free directory assistance using the Internet at http://www.yellowpages.com.

http://www.att.com/Common/1800yellowpages/.

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- Free directory assistance for residential and business telephone numbers using the Internet is also available at <a href="http://www.whitepages.com">http://www.whitepages.com</a> and <a href="http://www.dexknows.com">http://www.dexknows.com</a>.
- Google provides free directory assistance for business telephone numbers at 1-800-Goog411 (i.e. 1-800-466-411). See <a href="http://www.google.com/goog411">http://www.google.com/goog411</a> for details.
- Microsoft's Live Search 411 service provides free directory assistance for business telephone numbers at 1-800-CALL-411 (i.e. 1-800-225-5411). See http://www.livesearch411.com for details.

## Q. Are there other sources of directory assistance available other than those already mentioned?

Yes. The http://www.msn.com, http://www.aol.com A. web portals and http://www.yahoo.com offer easy links to white and yellow page listings on their home pages, which makes for convenient access for users. Search engines such as Google and Yahoo can be used to find businesses by category and location. A company such as InfoUSA offers mass listings of white and yellow page telephone numbers by way of downloads and CD-ROMs. See http://www.infousa.com/. Alternative directory assistance providers like DA America offer business customers a service whereby the directory assistance calls of employees are redirected to DA America in the company's PBX with accompanying savings of 50% or more. See http://www.daamerica.com

- Q. What evidence do you have that Frontier's customers are using these alternatives
   and relying less on Frontier local directory assistance service?
- A. Frontier has experienced a decline in number of calls to the Directory Assistance
  Operator as a result of the many options available to customers. Exhibit 6 shows the
  decline from 2007 to 2008 and the anticipated continued decline for 2009.
- 283 Q. You mentioned earlier the telecommunications policy the 1995 General Assembly established in Public Chapter No. 408. What policy was established? 285
- Among many other things, Public Chapter No. 408 established a "Declaration of Telecommunications Services Policy" which is codified at Tenn. Code Ann. §65-4-123. The section, which has remained unchanged, states in full:

The general assembly declares that the policy of this state is to foster the development of an efficient, technologically advanced, statewide system of telecommunications services by permitting competition in all telecommunications services markets, and by permitting alternative forms of regulation for telecommunications services and telecommunications services providers. To that end, the regulation of telecommunications services and telecommunications services providers shall protect the interests of consumers without unreasonable prejudice or disadvantage to any telecommunications services provider; universal service shall be maintained; and rates charged to residential customers for residential telecommunications services shall remain affordable.

## Q. Could you please summarize your testimony?

- A. Yes. My testimony demonstrates how the reasoning the Authority applied in approving AT&T's local directory assistance tariff is appropriate and fully applicable to Frontier. Local directory assistance service alternatives are numerous, easily accessible and are in some instances completely free of charge. Moreover, the burden of providing local directory assistance allowances is not borne equally between Frontier and its direct competitors. The Authority should not needlessly and purposely perpetuate this anticompetitive inequality at this late date in the industry's transition to a competitive environment. Approval of Frontier's tariff is most consistent with the State of Tennessee's overall telecommunications policy and the Authority's mission statement which is: "to promote the public interest by balancing the interests of utility consumers and providers while facilitating the transition to a more competitive environment." The Authority should approve Frontier's local directory assistance tariff as filed.
- 316 Q. Does this complete your testimony?
- 318 A. Yes.

### **EXHIBIT 1**

## Authority Dockets Concerning Price Regulated Incumbent Local Directory Assistance Call Allowances

Docket	Price Regulated Incumbent	Date of Final	Results.
No.		Order	
96-	United Telephone- South	September 4,	Established rate for local directory
01423	east, Inc	1997	assistance but with 6 calling
			allowances and exemptions for the
			disabled and customers 65 years of
			age or older.
99-	Bellsouth	July 29,1999	Same as 96-01423
00391	Telecommunications, Inc.		
04-	Bellsouth	September 2,	BellSouth local directory assistance
00416	Telecommunications, Inc,	2005	call allowances. reduced from 6 to 3.
06-	Bellsouth	April 17,2007	BellSouth local directory assistance
00232	Telecommunications, Inc.		call allowances reduced from 3 to 1.
06-	United Telephone-	November 21,	United local directory assistance call
00288	Southeast, Inc.	2007	allowances reduced from 6 to 3.
07-	United Telephone -	Current	United files to reduce local directory
00269	Southeast, Inc.	Case/Pending	assistance call allowances from 3 to
			1.
08-	Citizens	Pending	Citizens files to introduce local
00021	Telecommunications		directory assistance rate with 2
	Company of Tennessee LLC		residential allowances and
			exemptions for the disabled
08-	Belisouth	Withdrawn	BellSouth filed to reduce local
00076	Telecommunications, Inc.		directory assistance call allowances
			from 1 to 0.

## Ben Lomand Communications, Inc.

#### dba **BLC**

Local Exchange Services T.R.A. No. 1

Original Page 56

- 3. Service Descriptions (Cont'd)
  - 3.3 <u>Directory Assistance</u>
    - 3.3.1 Rates

Per Local Directory Assistance Call exceeding exemptions \$0.35

- 3.3.2 Exemptions
  - a. Residence Service 5 calls per billing cycle per billing account
  - b. Business Service 25 calls per billing cycle per billing account
  - c. Handicap Unlimited Calls
  - d. Person legally blind and/or otherwise unable to use a directory.

NOTE: Exemption will be effective with written documentation of blindness and/or physical disability.

Issued: June 20, 2002 Effective: June 24, 2002

Charter Fiberlink-Tennessee, LLC Local and Intrastate Interexchange Services Tariff **TRA Tariff No. 1** 1<sup>st</sup> Revised Page 29 Cancels Original Page 29

#### 3.2.13 911 Emergency Services

The Telephone Company will supply the 911/E-911 service provider in the Telephone Company's service area with accurate information necessary to update the 911/E-911 database at the time Telephone Company accepts Customer orders.

At the time that Telephone Company provides basic local service to a Customer, Telephone Company will make the necessary equipment or facility additions in order to accurately and properly update the database for 911/E-911.

The Telephone Company will bill the customer a monthly 911 surcharge, per voice grade equivalent line in order to fund the E-911 system. Funds collected will be remitted to the required agency.

#### 3.2.14 Directory Assistance

The Telephone Company shall list its customers with the directory assistance operators to provide the requested telephone numbers of all customers, except telephone numbers unlisted at the customer's request.

In the event of an error in the listed numbers of any customer, the Telephone Company shall intercept all calls to the listed number for a reasonable period of time provided existing telephone equipment will permit and the number is not in service. In such event of an error or omission in the name listing of a customer such customer's correct name and telephone number shall be filed with directory assistance operators. The correct number furnished the calling party either upon request or interception.

Whenever any customer's telephone number is changed after a directory is published, the utility shall intercept all calls to the former number for a reasonable period of time and give the calling party the new number provided exiting telephone equipment will permit and the customer so desires.

Directory Assistance Direct-Dialed calls for the physically impaired customers are provided at no charge. Customers who are physician certified physically impaired and unable to use the telephone directory must obtain an exemption from the Telephone Company by completing an exemption form supplied by the Telephone Company.

(C)

#### 3.2.15 711 Access for Telecommunications Relay Service

Telecommunications Relay Service (TRS) enables deaf, hard-of-hearing or speech-impaired persons who use a Text Telephone (TT) or similar devices to communicate with the hearing population not using TT. It also allows the hearing population not using a TT to communicate with deaf, hard-of-hearing or speech-impaired persons who do use a TT. A Customer will be able to access the state provider to complete such calls by either dialing the applicable telephone number directly or by dialing the number 711.

Issue Date: January 4, 2007 Effective Date: January 5, 2007

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

**TRA Tariff No. 1** 8<sup>th</sup> Revised Page 33 Cancels 7<sup>th</sup> 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

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

TRA Tariff No. 1 2<sup>nd</sup> Revised Page 37 Cancels 1<sup>st</sup> Revised Page 37

The provision of Busy Line interrupt involved a Telephone Company-provided operator interrupting a conversation in progress to ascertain willingness to establish conversation with an alternate party.

#### Regulation

This Service is provided where facilities exist for line status and busy interrupt through a Telephone Company-provided operator.

No request will be processed on a collect or reversal-of-charge or person-to-person basis. However, in the case of an Emergency Busy Line Interrupt, the caller may bill collect, if necessary.

The rates set forth for Line Status Verification and Busy Line Interrupt are in addition to the rates associated with Local Exchange Services, if the calling party requests the operator to place the call.

The charge for Busy Line Interrupt applies whenever the operator interrupts the conversation even thought one or the other parties interrupted refuses to terminate the conversation in progress.

If the line verified is not in use or as the result of interrupt the line is cleared, and at the calling party's request the operator completes the call, the current applicable Operator Assistance Service charges apply as described in section 4.3 in addition to the line status Verification or Busy Line Interrupt Charge.

#### Exemptions

Charges for Line Status Verification and Busy Line Interrupt are not applicable to calls placed from authorized emergency agencies. Police, Fire, Ambulance and 911/911-Like agencies are those agencies that qualify for this exemption.

#### 4.9 Directory Assistance

Telephone Company will provide end user with access to Directory Assistance for obtaining telephone numbers. Current charges associated with obtaining Directory Assistance information are located in Section 4.3 of this Tariff.

Exemptions are described in Section 3.2.14 of this tariff.



Issue Date: July 2, 2007 Effective Date: July 10, 2007

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

TRA Tariff No. 1 5<sup>th</sup> Revised Page 55 Cancels 4<sup>th</sup> Revised Page 55

#### 7.7.3. Other Services and Charges

Name	Description	Monthly Recurring Charge	
Additional Listing	Additional directory listing in white and yellow pages for additional telephone numbers on the same account. Limit one listing per telephone number.	\$ 5.00, per line, per month	
Busy Line Interrupt	Operator assisted interruption of a busy telephone line	\$20.00, per use	
Busy Line Verify	Operator assisted verification of a busy telephone line	\$20.00, per use	
Directory Assistance	Charges to obtain telephone numbers from operator	\$ 1.79, per use	(1)
	Physically Impaired Customers	No Charge	
			(D) (D)
Non-Listed Number	Telephone number not listed in Directory but, available via 411 information	\$ 4.00, per number, per month	
Non-Published Number	Telephone number not listed in directory or available for 411 Information	\$ 5.00, per number, per month	
Operator Services	Operator Assisted Calls in dialing a local number, 3 <sup>rd</sup> number, collect call	\$ 1.10 per use	
Seasonal Suspension	Allows a telephone account to Remain active while suspending Service for 3, 4, 5, or 6 consecutive months. Only 1 allowed per calendar year.	\$ 10.00 per line per month	

Issue Date: February 22, 2008 Effective Date: March 23, 2008

# COMCAST DIGITAL VOICE SERVICE Residential Pricing List (Effective: March 19, 2008) KNOXVILLE, TENNESSEE

VERSION II

MONTHLY SERVICE (Cont'd)	MONTHLY CHARGE	MONTHLY TRANSACTIONAL CHARGES CHARGE	CHARGE
Optional Services – per month  • Call Trace • Domestic Toll Restriction • International Toll Restriction • Prohibit Bill to Third Party	No Charge No Charge No Charge No Charge	Directory Assistance Services  • Domestic Directory Assistance  – Standard Directory Assistance  – Enhanced Directory Assistance  – Directory Assistance with Call Completion [4]  • International Directory Assistance [5]	\$0.99/call \$0.99/call \$0.99/call \$4.99/call
• Speed Dial 30	No Charge	· International Call Completion	Note [6]
Directory Services – per month  • Standard Directory Listing	No Charge	Domestic Operator Services • Operator Surcharge 13.71	\$2.49/call
<ul> <li>Non-published Directory Service, per line</li> </ul>	\$ 4.50/mo.	Busy Line Verify	\$2.99/call
<ul> <li>Computer/Fax Line Exclusion</li> </ul>	No Charge	<ul> <li>Busy Line Interrupt (includes busy line verify)</li> </ul>	\$5.99/call
<ul> <li>Non-listed Directory Service, per line</li> <li>Additional Listing</li> </ul>	\$ 2.20/mo. Note [6]	International Operator Services • Operator Surcharge [7]	\$4.99/call
Modem Lease Fee [1]	\$ 3.00/mo. \$ 5.00/mo.		

[1] Customers subscribing to Comcast Digital Voice service (only) are subject to the modem lease fee shown. Where Comcast Digital Voice service is provided in combination with Comcast High Speed Internet Service, only one modem fee applies.

[2] Limit 3 number requests per call.

[3] Registered users with qualifying disabilities may be eligible for waived or discounted charges for calls originating from their home that utilize Domestic Directory Assistance, Domestic Call Completion, or Operator Services for Domestic Station-to-Station Sent-Paid calls.

[4] See "USAGE" section following for usage rates applicable to non-local DA Call Completion for Local with More subscribers.

[5] Limit 1 number request per call.

[6] Service is not currently available.

7] See "USAGE" section following for applicable usage rates.

subscription to all specified Concast products. Pricing shown does not include federal, state or local regulatory fees, taxes or surcharges. Service is subject to the Comcast Digital Voice Residential Subscriber Agreement and other applicable terms and conditions. Prices shown are effective on the date specified and are subject to change. Other restrictions Service is for residential customers located in Comcast serviceable areas only and is subject to availability. Multi-product discounts for Unlimited Package require continuous apply. For additional information, contact us at 1-888-COMCAST.