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October 10, 2008

VIA HAND DELIVERY

Hon. Tre Hargett, Chairman
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

filed electronically in docket office on 10/10/08

Re: *CompSouth Petition for Declaratory Ruling*
Docket No. 08-00184

Dear Chairman Hargett:

Enclosed for filing in the referenced docket are the original and four copies of AT&T Tennessee's *Petition to Intervene*.

A copy has been provided to counsel for CompSouth.

Very truly yours,

A handwritten signature in black ink, appearing to be "Guy Hicks", with a large, sweeping loop that extends to the right and then curves back down to the left, underlining the name.

Guy Hicks

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of ComSouth for Declaratory Ruling*

Docket No. 08-00184

PETITION OF AT&T TENNESSEE
FOR LEAVE TO INTERVENE

BellSouth Telecommunications, Inc., dba AT&T Tennessee ("AT&T"), pursuant to T.C.A. §4-5-310, T.C.A. §65-2-107, T.C.A. § 4-5-223 and Rule 1220-1-2-.05(4), petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding and, in support thereof, states as follows:

1. AT&T, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing telecommunications service in the state of Tennessee.

2. On September 26, 2008, CompSouth filed a petition with the Authority requesting that the Authority "declare that ... federal law requires BellSouth to commingle facilities provided under 47 U.S.C. § 271 with those that must be provided under 47 U.S.C. § 251."

3. CompSouth seeks to impose on AT&T, ***and no other company in Tennessee***, a new wholesale obligation which the Authority has twice ruled in Docket No. 04-00381 that AT&T is not required to provide.

4. Matters affecting AT&T's legal interests may be determined in this proceeding, and AT&T's interests will not be adequately represented unless the Authority allows AT&T to intervene.

5. Allowing AT&T to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

6. AT&T respectfully requests that it be granted leave to intervene, file a statement or other pleadings, and otherwise participate as a party in the above-captioned proceeding.

WHEREFORE, AT&T prays:

1. That it be permitted to intervene in this proceeding and participate as a party;

2. That AT&T be permitted to file, on or before November 6, 2008, a statement or other pleading setting forth its legal position;

3. That the Authority take no action until it has reviewed AT&T's statement or other pleading; and

4. That AT&T have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.
dba AT&T TENNESSEE

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2008, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

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