

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

IN RE:)
)
PETITION FOR REGULATORY EXEMPTION) **DOCKET NO. 08-00192**
PURSUANT TO T.C.A. §65-5-108(b) TO INCREASE)
REGULATORY PARITY AND MODERNIZATION)

**PETITION OF THE TENNESSEE CABLE TELECOMMUNICATIONS
ASSOCIATION FOR LEAVE TO INTERVENE**

The Tennessee Cable Telecommunications Association ("TCTA" or "Petitioner"), by and through its undersigned counsel, hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene pursuant to Tenn. Code Ann. § 4-5-310, Tenn. Code Ann. § 65-2-107, and Tenn. Comp. R. & Regs. 1220-1-2-.08. In support of this petition, TCTA respectfully states the following:

1. The TCTA is a trade organization whose membership consists primarily of owners and operators of franchised cable television systems throughout the state of Tennessee.
2. Presently, some TCTA members either hold a certificate of public convenience and necessity to provide telecommunications services statewide or intend to make application to provide services statewide or in various locales throughout the state as permitted by law.
3. In its Petition, AT&T Tennessee ("AT&T") requests the Tennessee Regulatory Authority ("TRA") exempt certain subscriber services from regulation pursuant to Tenn. Code Ann. § 65-5-108(b). In addition, AT&T requests complete exemption from TRA regulation for all currently regulated services in AT&T's Intrastate Service Tariffs, including the General Subscriber Services Tariff and Private Line Services Tariff.

4. TCTA moves to intervene in this matter in order to ensure that its member's interests are represented. As some of TCTA's members are certified telecommunication service providers, their legal rights, duties, privileges, immunities, may be affected or determined by the outcome of this proceeding, and TCTA member's interest or other legal interests or responsibilities will not be adequately represented unless allowed to intervene.

5. TCTA believes its Petition for Intervention is warranted and is being filed more than seven (7) days prior to the hearing of this matter.

6. The Petitioner's participation will not impair the interests of justice or the orderly prompt conduct of the Authority's proceeding.

WHEREFORE, TCTA, respectfully requests that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, including but not limited to the right to participate in any and all pre-hearing conferences, to produce and cross examine witnesses, to seek data requests and other discovery, and to file motions, briefs, testimony, and/or comments in order to assist the Authority's deliberations and otherwise protect the interests of TCTA and the public interest. Additionally, Petitioner requests to receive copies of any notices, orders or any other documents filed herein, and have such other, further and general relief as the justice of their cause entitle them to receive.

Respectfully submitted,

FARRIS MATHEWS BOBANGO PLC

By: 

Charles B. Welch, Jr.

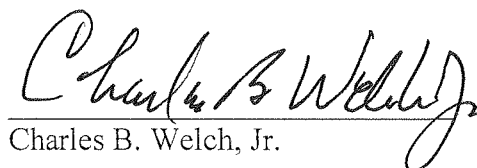
Attorney for the Tennessee Cable Telecommunications Association
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Nashville, Tennessee 37219
(615) 726-1200

CERTIFICATE OF SERVICE

I hereby certify that an exact copy of the foregoing Petition to Intervene has been sent by United States mail, postage pre-paid, to the following parties of record:

Guy M. Hicks
Joelle Phillips
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201

This 14th day of November, 2008.


Charles B. Welch, Jr.