

**IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE**

**IN RE:**

**EXAMINATION OF ISSUES SURROUNDING  
BELLSOUTH TELECOMMUNICATIONS, INC.  
D/B/A AT&T TENNESSEE'S NOTICE OF  
JUNE 28, 2011 CONCERNING BLC  
MANAGEMENT, LLC D/B/A ANGLES  
COMMUNICATION SOLUTIONS, DPI  
TELECONNECT, LLC, GANCO, INC. D/B/A  
AMERICAN DIAL TONE, IMAGE ACCESS, INC.  
D/B/A NEWPHONE, AND ONETONE  
TELECOM, INC.**

**DOCKET NO. 11-00109**

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**PETITION TO INTERVENE**

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Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest because consumers may be adversely affected. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.

2. BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee ("AT&T") is a public utility regulated at least in part by the Authority and provides telecommunication services to consumers located in the State of Tennessee.

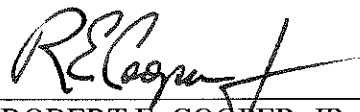
3. On June 28, 2011, AT&T delivered a letter to the Chairman of the Authority wherein it described a dispute with five Resellers of telecommunication services and notified the Authority that it would terminate service to those Resellers and consequently to the customers of those Resellers. The Authority subsequently opened this Docket to examine the issues raised by that letter.

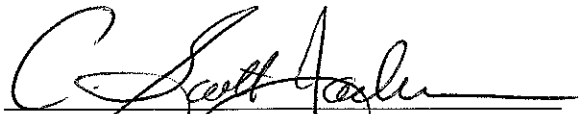
4. The Consumer Advocate seeks intervention in this matter to insure that the customers of the Resellers named in AT&T's June 28, 2011 letter are given adequate notice of the possible impending termination of their telephone service and are further given assistance in securing new telephone service, particularly Lifeline service, should it become necessary. The Consumer Advocate also seeks to intervene in order to raise generally the concerns of consumers in the questions and disputes raised by this Docket.

5. Only by participating in this proceeding can the Consumer Advocate be sure that it will have standing to investigate the allegations made by AT&T and to voice its concerns for the rights of individual consumers of the services provided by the Resellers named by AT&T in its June 28, 2011 letter.

WHEREFORE, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,

  
ROBERT E. COOPER, JR. (BPR #010934)  
Attorney General and Reporter  
State of Tennessee



VANCE L. BROEMEL (BPR #011421)

Assistant Attorney General

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Dated: July 25, 2011.

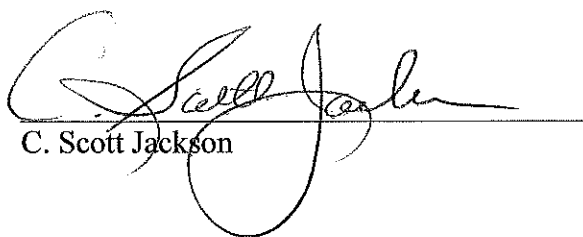
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Guy M. Hicks, Esq.  
General Counsel  
AT&T Tennessee  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

Henry M. Walker, Esq.  
Bradley Arant Boult Cummings, LLP  
1600 Division Street  
Suite 700  
Nashville, TN 37203

This the 25<sup>th</sup> day of July, 2011.



C. Scott Jackson