

FARRIS MATHEWS BOBANGO, PLC

ATTORNEYS AT LAW

Nashville · Memphis

HISTORIC CASTNER-KNOTT BUILDING
618 CHURCH STREET, SUITE 300
NASHVILLE, TENNESSEE 37219

(615) 726-1200 telephone · (615) 726-1776 facsimile

Charles B. Welch, Jr.
cwelch@farrismathews.com

Direct Dial:
(615) 687-4230

August 16, 2012

Ms. Sharla Dillon
Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

filed electronically in docket office on
08/16/12

Re: Application of Bristol Tennessee Essential Services for Expanding Certificate of
Public Convenience and Necessity to Provide Competing Telecommunications
Services Statewide


Dear Ms. Dillion:

Enclosed for filing, please find the original plus four (4) copies of the
Petition for Leave to Intervene in the above-referenced proceeding to be filed on
behalf of the Tennessee Cable Telecommunications Association. Copies are being
served on parties of record. Also enclosed is our check in the amount of \$25.00 to
cover the filing fee.

If you have any questions or concerns with regard to this filing, please do not
hesitate to contact me.

Sincerely,

FARRIS MATHEWS BOBANGO, PLC

A handwritten signature in black ink, reading "Charles B. Welch, Jr." with a stylized flourish at the end.

Charles B. Welch, Jr.

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

IN RE:)

APPLICATION OF BRISTOL TENNESSEE ESSENTIAL) Docket No. 12-00060
SERIVCES TO EXPAND ITS CERTIFICATE OF)
CONVENIENCE AND NECESSITY TO PROVIDE)
COMPETING TELECOMMUNICATIONS)
SERVICES STATEWIDE)

**PETITION TO INTERVENE OF TENNESSEE CABLE COMMUNICATION
ASSOCIATION**

The Tennessee Cable Telecommunications Association. ("TCTA"), pursuant to T.C.A. §4-5-310, and the Rules of the Tennessee Department of State Administrative Procedures Division, Chapter 1360-4-1-.12, petitions to intervene in the above-referenced proceeding and in support of its Petition states as follows:

1. The TCTA is a trade organization whose membership consists primarily of owners and operators of franchised cable televisions systems throughout the State of Tennessee.
2. Presently, some TCTA members either hold a certificate of public convenience and necessity to provide telecommunication services throughout the State of Tennessee, or intend to make application to provide services in all geographic locations permitted by law.
3. The applicant is a municipally owned electric utility authorized by state law to provide telecommunications services subject to certain requirements designed to promote fair competition and prevent the municipality from engaging in anti-competitive practices which would frustrate the development of an effectively competitive telecommunications market in this State. Tennessee Code Annotated §7-52-401, et seq. If granted authority to provide

telecommunications services, the applicant will be providing such services in direct competition with the members of the Petitioner. The TCTA submits that the implementation of the competitive safeguards prescribed by State law is essential to the furtherance of fair competition and it has a direct and substantial interest in the manner and the method in which the municipality will be required to comply with the statutory requirements and the rules and regulations of the Tennessee Regulatory Authority.

4. As certificated entities authorized to provide telecommunication services, or potential telecommunications service providers, Petitioner's legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and Petitioner's interest will not be adequately represented unless it is allowed to intervene.

5. The TCTA's participation will not impair the interest of justice or the orderly and prompt conduct of the Authority's proceeding.

6. The TCTA seeks to intervene and participate as its interest may appear.

7. This petition to intervene is being filed at least seven (7) days before the hearing of this cause.

WHEREFORE, the Tennessee Cable Telecommunications Association requests that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, and 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 its cause may entitle to receive.

Dated this 16th day of August, 2012

Respectfully submitted,

FARRIS MATHEWS BOBANGO, PLC

BY: Charles B. Welch, Jr.
Charles B. Welch, Jr.
Attorney for The Tennessee Cable
Telecommunication Association
618 Church Street, Suite 300
Nashville, TN 37219
(615)726-1200

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served via electronic mail and U.S. Mail upon the following on the 16th day of August, 2012:

Mark W. Smith
Miller & Martin, PLLC
832 Georgia Avenue, Suite 1000
Chattanooga, Tennessee 37402
msmith@millermartin.com
Attorney for Bristol Tennessee Essential Services

FARRIS MATHEWS BOBANGO, PLC

By: Charles B. Welch, Jr.