

BEFORE THE TENNESSEE REGULATORY AUTHORITY AT
NASHVILLE, TENNESSEE

SEP 24 PM 3 58
IN RE: TARIFF FILING OF UNITED)
TELEPHONE-SOUTHEAST, INC., FOR)
LOCAL DIRECTORY ASSISTANCE)
CHARGES)
EXECUTIVE ASSISTANCE)

DOCKET NO. 96-1423
TARIFF NO. 96-201

DO NOT REMOVE

PETITION TO INTERVENE, SUSPEND TARIFF AND CONVENE A CONTESTED CASE

Pursuant to Tenn. Code Ann. § 65-4-118, the Consumer Advocate Division of the Office of the Attorney General ("Consumer Advocate") hereby moves the Tennessee Regulatory Authority ("Authority") for leave to intervene in the above-captioned proceeding and moves the Authority to suspend the proposed tariff and convene a contested case to determine the justness and reasonableness of the filing. As grounds for this request, the Consumer Advocate states that:

1. Pursuant to Tenn. Code Ann. § 65-4-118, the Consumer Advocate may participate or intervene in any matter before the Authority and has the duty and authority to represent the interests of Tennessee consumers of utility services.
2. Any Authority decision in the above-captioned referenced matter may have a direct and material effect upon the legal duties, rights, privileges, immunities or other legal interests of Tennessee consumers of utility services.
3. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing this intervention.

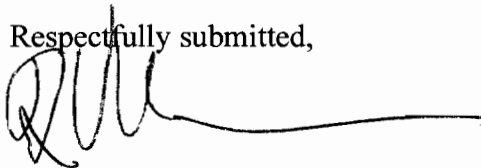
4. Pursuant to Tenn. Code Ann. § 65-5-203, the Authority has the authority to suspend proposed rate increases, changes or alterations pending a determination of whether such proposed changes are just and reasonable.

5. The tariff would add an additional charge for Directory Assistance. Since basic service includes a reasonable charge for Directory Assistance, the proposed charge is extortionist resulting in duplicate charges for Directory Assistance. The Authority should convene a contested case to consider this matter.

The Consumer Advocate requests that:

1. The Consumer Advocate be granted leave to intervene and participate in this proceeding as a party.
2. The Authority convene a contested case to consider the tariff.
3. An Order be entered suspending the proposed tariff to determine whether it is just and reasonable.

Respectfully submitted,

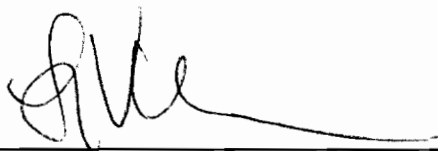
A handwritten signature in black ink, appearing to read 'L. Vincent Williams', with a long horizontal flourish extending to the right.

L. Vincent Williams
Consumer Advocate

Certificate of Service

I, L. Vincent Williams, hereby certify that a true and correct copy of the foregoing Petition has been served on the following parties of record by depositing a copy of the same in the United States mail, postage prepaid, addressed to them, in accordance with the following list, this 24 day of September, 1996.

James B. Wright, Esq.
14111 Capital Boulevard
Wake Forest, NC 27587-5900

A handwritten signature in black ink, appearing to read 'L. Williams', written over a horizontal line.

L. Vincent Williams