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Mid Atlantic Telecom

James B. Wright
Senior Attorney

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February 11, 1997

*Carolina Telephone
Centel-North Carolina
Centel-Virginia
United Telephone-Southeast*

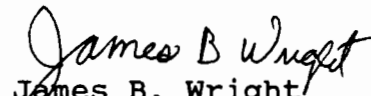
Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tenn. 37243-0505

Dear Mr. Waddell:

Attached is United Telephone-Southeast, Inc.'s responses to the February 4, 1997, Dated Discovery Requests of AT&T Communications of the South Central States, Inc. and the Consumer Advocate regarding United's proposed Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423. Proprietary information has been marked and should be handled accordingly.

If there are any questions regarding this information, please contact Steve Parrott at 919/554-7039.

Sincerely,


James B. Wright

Attachments

cc: Steve Parrott



Charles S. "Steve" Parrott
Director - State Regulatory Affairs

Mid-Atlantic Operations
14111 Capital Boulevard
Wake Forest, North Carolina 27587-5900
Telephone: (919) 554-7039
Fax: (919) 554-7595

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February 11, 1997

Mr. John Knox Walkup, Esq.
Gullett, Sanford, Robinson & Martin
Attorneys at Law
230 Fourth Avenue North, 3rd Floor
Nashville, TN 37219-8888

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Dear Mr. Walkup:

Attached is United Telephone-Southeast, Inc.'s response to the AT&T Communications of the South Central States, Inc. Discovery Request dated February 4, 1997 regarding United's proposed Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423. Proprietary Information has been marked and should be handled accordingly.

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Sincerely,

C. Steve Parrott

Attachments

cc: David Waddell - Tennessee Regulatory Authority
Chris Klein - Tennessee Regulatory Authority
Dianne Neal - Tennessee Regulatory Authority
Richard M. Tettelbaum - Citizens Telecom (w/o Proprietary Information)
Guy Hicks - BellSouth Telecommunications (w/o Proprietary Information)
L. Vincent Williams - Consumer Advocate Division
James B. Wright - Sprint
Bob Wallace - Sprint
Laura Sykora - Sprint

United Telephone-Southeast, Inc.
Discovery Request of AT&T Communications of the South Central States, Inc.
Dated February 4, 1997
Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423

Item 1. In its response to item 1 of AT&T's first data request, United states, "United has not performed any cost studies since January 1990 for intrastate switched access elements affected by the proposed tariffs in this docket." (emphasis added)

Has United, then, performed any cost studies since January 1990 for intrastate switched access charge elements that are not directly affected by the tariffs in this docket? If so, please produce all such studies.

Response:

United objects to the request for the production of cost studies for access elements that are not affected by the tariffs proposed in this case on the grounds that the information requested is not relevant.

United Telephone-Southeast, Inc.
Discovery Request of AT&T Communications of the South Central States, Inc.
Dated February 4, 1997
Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423

Item 2. For any cost studies identified in item 1 above, please indicate the specific methodology for each individual cost study, e.g. embedded costs, long-run incremental costs (LRIC), total services long-run incremental costs (TSLRIC) or total element long-run incremental costs (TELRIC).

Response:

Not Applicable.

United Telephone-Southeast, Inc.
Discovery Request of AT&T Communications of the South Central States, Inc.
Dated February 4, 1997
Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423

Item 3. In its response to item 3 of AT&T's first data request, United responded that, "United has plans to complete TELRIC studies in support of unbundled network service elements to be provided under local interconnection agreements."

Does United have plans to complete TELRIC, LRIC, or TSLRIC studies specifically for any switched access charge elements?

Response: United has no plans to complete TELRIC, LRIC, or TSLRIC cost studies for the switched access charge elements affected in this docket (Switched Transport Interconnection Charge and Carrier Common Line).



Charles S. "Steve" Parrott
Director - State Regulatory Affairs

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Dated February 4, 1997
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Discovery Request of AT&T Communications of the South Central States, Inc.
Dated February 4, 1997
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Mr. L. Vincent Williams
Consumer Advocate
Office of the Attorney General
Consumer Advocate Division
Cordell Hull Building, 2nd Floor
426 Fifth Avenue North
Nashville, Tennessee 37243-0500

Dear Mr. Williams:

Attached is United Telephone-Southeast, Inc.'s response to the Consumer Advocate Discovery Request dated February 4, 1997 regarding United's proposed Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423. Proprietary Information has been marked and should be handled accordingly.

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J. Knox Walkup - Val Sanford (AT&T)
James B. Wright - Sprint
Bob Wallace - Sprint
Laura Sykora - Sprint

United Telephone-Southeast, Inc.
Consumer Advocate Discovery Request Dated February 4, 1997
Tariff No. 96-201, Annual Price Cap Adjustment, Docket No. 96-01423

Item 1. Requests to Admit. - Please admit or deny the following:

(a) That by its Order of October 13, 1995 in docket 95-02616 the Tennessee Public Service Commission approved price regulation for United Telephone-Southeast, Inc.

Response: Admit.

(b) That by its Order of October 13, 1995 in docket 95-02616 the Tennessee Public Service Commission found that United Telephone-Southeast's rates in effect as of June 6, 1995 for all Basic Local Exchange Telephone Services (Basic Services) and Non-Basic Services as defined in Tenn. Code Ann. 65-5-208 were the Company's initial rates under price regulation..

Response: Admit.

(c) That Tenn. Code Ann. 65-5-208 defines a residential access line as a basic service.

Response: Admit.

(d) That on or before June 6, 1995 residential service was determined in accordance with the definitions in United Telephone-Southeast's tariffs and the tariffed definition affected the rates charged residential customers.

Response: Deny. Residential service is not specifically defined; however, regulations in Section U2 of United Telephone-Southeast, Inc.'s General Subscriber Services Tariff outline the appropriate application of residence service rates.

(e) That the tariffed prices for flat rate residential access lines on June 6, 1995 were as follows:

<u>Exchange</u>	<u>Rate Group</u>	<u>Monthly Rate per Line*</u>
Blountville	15	13.09
Limestone	14	12.77
Church Hill	13	12.44
Kingsport	13	12.44
Fall Branch	13	12.44
Midway(Sullivan County)	13	12.44
Midway(Washington County)	13	12.44
Sullivan Gardens	13	12.44

<u>Exchange</u>	<u>Rate Group</u>	<u>Monthly Rate per Line*</u>
Bluff City	12	12.01
Bristol	12	12.01
Johnson City	12	12.01
Jonesborough	12	12.01
Baileyton	10	11.21
Greeneville	10	11.21
Mosheim	10	11.21
Butler	9	10.70
Elizabethton	9	10.70
Hampton	9	10.70
Roan Mountain	9	10.70
Stoney Creek	9	10.70
Erwin	4	8.91
Mountain City	3	8.58

*United Telephone-Southeast, Inc. Tennessee Tariffs U3.3.1 Flat Rate Residential Service.

Identify by exchange any of the rates as listed above with which United Telephone-Southeast disagrees.

Response: Admit.

(f) That at June 6, 1995 United Telephone-Southeast's tariffs approved by the Tennessee Public Service Commission did not limit the number of residential access lines that could terminate at a household location.

Response: United objects to responding to this question because the question is not relevant to the issues in this proceeding.

g) That the tarified price per line for flat rate residential access lines on June 6, 1995 terminating at household locations with 6 or more access lines were as follows:

<u>Exchange</u>	<u>Rate Group</u>	<u>Monthly Rate per Line*</u>
Blountville	15	13.09
Limestone	14	12.77
Church Hill	13	12.44
Kingsport	13	12.44
Fall Branch	13	12.44
Midway(Sullivan County)	13	12.44
Midway(Washington County)	13	12.44
Sullivan Gardens	13	12.44
Bluff City	12	12.01
Bristol	12	12.01