STATE OF TENNESSEE

Office of the Attorney General



REGIS IN THE STATE OF AUTH.

'97 MAR 21 PM 4 18

c . THE

JOHN KNOX WALKUP ATTORNEY GENERAL AND REPORTER EXECUTIVE SECRETARY

MICHAEL E. MOORE SOLICITOR GENERAL

CORDELL HULL BUILDING NASHVILLE, TN 37243-0485

TELEPHONE (615) 741-3491 FACSIMILE (615) 741-2009

March 21, 1997

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

Re:

Tariff Filing By United Telephone-Southeast, Inc. To Reflect

Annual Price Cap Adjustment Tariff 96-201

Docket No. 96-01423

Dear Mr. Waddell:

PATRICIA J. COTTRELL

CHIEF DEPUTY ATTORNEY GENERAL

Please be advised that the filing of our Motion For Extension of Time or Continuance after 12:00 noon was inadvertent. The text of the Motion and affidavit was prepared on Thursday afternoon March 20, 1997. However, no signature was placed on the document until a notary could verify and affix a signature.

Respectfully submitted,

L. Vincent Williams

Consumer Advocate

PLEASI

DO NOT REMOVE

IN THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE 21 PM 12 22

)	EXECUTIVE SEOPETARY DOCKET NO. 96-01423
REFLECT ANNUAL PRICE CAP)	
ADJUSTMENT (TARIFF NO.96-201))	

MOTION FOR EXTENSION OF TIME OR CONTINUANCE

Comes the Consumer Advocate Division (ConAd) to respectfully request an extension of time to submit its brief in the case *sub judice*. For cause ConAd would show:

- That the Tennessee Regulatory Authority orally requested the parties to submit briefs regarding the issues in this case by noon of March 21, 1996.
- 2. That counsel for the Consumer Advocate Division is the sole counsel for the division at this time and he is has been required to respond to legislative inquiries, prepare for other hearings and handle a variety of other matters.
- That because of the stage of the various cases counsel is involved in, the cases are not suitable for reassignment at this time.
- 4. That counsel has reviewed tapes of several of the legislative hearings for which he has no transcription.
- 5. That counsel has reviewed transcripts of tapes of legislative hearings for which he has a transcript.
- 6. That some of the legislative tapes for which there is no transcript, appear relevant to the questions presented in this case.

DO MOT DEMOVE

- 7. That because of other ongoing matters and the difficulty of transcribing the tapes, ConAd has contracted with a service which specializes in preparing transcriptions of legislative hearings for production of relevant transcripts.
- 8. That the specialist has informed the division that the transcripts will not be complete until sometime Tuesday, March 25, 1996.
- 9. That upon receipt of the transcript, it must be analyzed.
- 10. That upon analysis, the matters must be briefed.
- That the Consumer Advocate Division requests an extension of time to April 1, 1997,
 which avoids the Good Friday and Easter Holiday.
- 12. That ConAd does not expect any party's substantive or procedural rights to be prejudiced by the extension of time.

Wherefore the Consumer Advocate Division prays that the Tennessee Regulatory

Authority grant it an extension of time or continuance to April 1, 1997 to submit its brief.

Respectfully submitted,

L. Vincent Williams

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion has been mailed postage prepaid to the parties listed below this 2 (5) day of March, 1997.

L. Vincent Williams

Val Sanford, Esq. 230 4th Ave., North, 3rd Floor P.O. Box 198888 Nashville, TN 37219-8888

Richard Tettlebaum P.O. Box 770 300 Bland Street Bluefield, WV 24701 Guy M. Hicks, Esq. BellSouth Telecommunications, Inc. 333 Commerce Street, Suite 2101 Nashville, TN 37201-3300

Jim Wright, Esq. United Telephone-Southeast, Inc. 14111 Capital Blvd. Wake Forest, NC 27587

L. Vincent Williams

IN THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: TARIFF FILING BY UNITED TELEPHONE-SOUTHEAST, INC. TO REFLECT ANNUAL PRICE CAP ADJUSTMENT (TARIFF NO.96-201))	DOCKET NO. 96-01423			
AFFIDAVIT				
I, L. Vincent Williams of the Consumer Ad office, hereby certify that the attached Motion is accommodately the strategies of the Consumer Ad office, hereby certify that the attached Motion is accommodately the strategies of the Consumer Ad office, hereby certify that the attached Motion is accommodately the strategies of the Consumer Ad office, hereby certify that the attached Motion is accommodately than the strategies of the Consumer Ad office, hereby certify that the attached Motion is accommodately than the strategies of the Consumer Ad office, hereby certify that the attached Motion is accommodately than the strategies of the Consumer Ad office is accommodately than the strategies of the Consumer Ad office is accommodately than the strategies of the Consumer Ad office is accommodately than the strategies of the Consumer Ad office is accommodately than the strategies of the Consumer Advanced Motion is accommodately than the strategies of the Consumer Advanced Motion is accommodately than the consumer Advanced Motion is accommodately the consumer Advanced Motion is accommodately the consumer Advanced Motion	•			
Sworn to and subscribed before me this 2 5 day of March, 1997.				
Sola a A. Harris NOTARY PUBLIC My commission expires on: 1/20/99				