

BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, Tennessee 37201-3300

615 214-6301  
Fax 615 214-7406

 **BELLSOUTH**

'97 APR 23 PM 2:29  
Guy M. Hicks  
General Counsel  
EXECUTIVE SECRETARY

April 28, 1997

**VIA HAND DELIVERY**

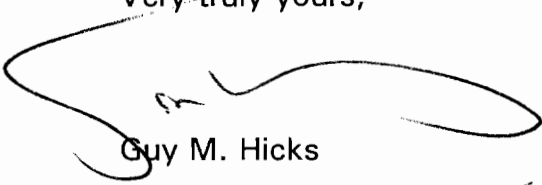
Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37238

Re: *United Telephone-Southeast, Inc. Tariff No. 96-201 to Reflect Annual  
Price Cap Adjustment*  
Docket No. 96-01423

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Motion to Strike the Consumer Advocate Division's Reply Brief in the above-referenced matter. A copy has been provided to counsel of record.

Very truly yours,

  
Guy M. Hicks

GMH/jem

Enclosure

CONFIDENTIAL  
LET  
NOT

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: *United Telephone-Southeast, Inc. Tariff No. 96-201 To Reflect Annual Price Cap Adjustment*

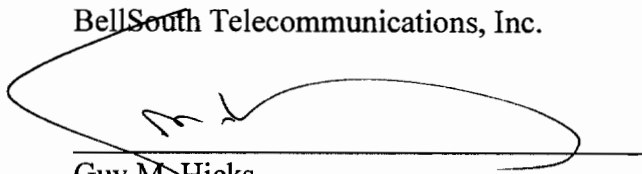
Docket No. 96-01423

**BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION TO  
STRIKE THE CONSUMER ADVOCATE DIVISION'S REPLY BRIEF**

During the April 15 hearing on the Consumer Advocate Division's ("CAD") Motion for Extension of Time or Continuance, the TRA ruled that the parties would be allowed to file briefs in this matter by April 18, 1997, and that the parties would be permitted to file reply briefs of no more than five pages by April 24, 1997. Although neither United nor BellSouth filed a brief on April 18, the CAD has inexplicably filed a "Response of Consumer Advocate Division" brief in this matter. The "Response" merely repeats arguments previously made by the CAD in previously filed briefs. Given that there was nothing filed by the other parties on April 18 to which the CAD could reply, the CAD's filing is not a reply brief but is instead yet another attempt on its part to circumvent the clear directives of the TRA in this docket in an attempt to gain an unfair advantage. In light of the previous admonition the TRA has already directed to the CAD in this docket, the TRA should strike the CAD's "Reply" brief from the record and direct the CAD to comply with its orders.

Respectfully submitted,

BellSouth Telecommunications, Inc.



Guy M. Hicks

Patrick W. Turner

333 Commerce Street, Suite 2101

Nashville, TN 37201-3300

615/214-6301

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 1997, a copy of the foregoing document was served on the parties of record, via U. S. Mail, postage pre-paid, addressed as follows:

Ed Phillips, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Vincent Williams, Esquire  
Consumer Advocate Division  
426 Fifth Ave., N., 2nd Fl.  
Nashville, TN 37243-0500

James B. Wright, Esquire  
United Telephone-SE  
14111 Capital Blvd.  
Wake Forest, NC 27587-5900

Henry Walker, Esquire  
Boult, Cummings, et al.  
414 Union St., #1600  
P. O. Box 198062  
Nashville, TN 37219-8062

Val Sanford, Esquire  
Gullett, Sanford, et al.  
230 Fourth Ave., N., 3d Floor  
P. O. Box 198888  
Nashville, TN 37219-8888

