



**James B. Wright**  
Senior Attorney

May 9, 1997

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

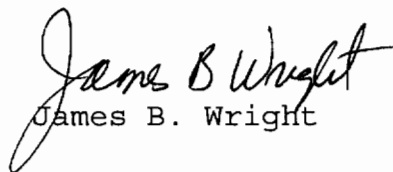
RE: Docket No. 96-01423 (UTSE Annual Price Cap Adjustment)

Dear Mr. Waddell:

Enclosed for filing in the above case are the original and fourteen copies of United Telephone-Southeast, Inc.'s Response to the Consumer Advocate's Motion to Strike Briefs of UTSE and BellSouth.

A copy of this Response is being furnished to counsel of record.

Sincerely yours,

  
James B. Wright

JBW:mhh

Enclosures

CC: Steve Parrott (with enclosure)  
Counsel of Record (with enclosure)  
Bob Wallace (with enclosure)

#10599

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Carolina Telephone  
Centel-North Carolina  
Centel-Virginia  
United Telephone-Southeast  
EXECUTIVE SECRETARY

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. 96-10423

UNITED TELEPHONE-SOUTHEAST, INC.'S RESPONSE TO  
MOTION TO STRIKE BRIEFS OF UTSE AND BELL SOUTH

The Consumer Advocate filed a Motion on April 18, 1997, asserting that the Post Hearing Briefs of United Telephone-Southeast and BellSouth should be stricken because these Briefs rely upon legislation proposed but not enacted, citing the Blake v. Abbott case. As pointed out in BellSouth's Reply to the Consumer Advocate's Motion, such an assertion is inaccurate since the proposed legislation was in fact enacted. Accordingly, the Blake case is factually distinguishable from this proceeding and should not be relied upon as suggested by the Consumer Advocate.

The Consumer Advocate also notes that United's Brief contains an argument dealing with an issue other than directory assistance and asks that such discussion be stricken. United does not object to striking the part of its Post Hearing Brief dealing with 911 Emergency Service appearing on pages 8 and 9.

Respectfully submitted,  
UNITED TELEPHONE-SOUTHEAST, INC.

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

CERTIFICATE OF SERVICE  
(UTSE Annual Price Cap Adjustment)

The undersigned hereby certifies that United Telephone-Southeast, Inc.'s Response to Consumer Advocate's Motion to Strike has been served upon the following counsel of record in Docket No. 96-01423 this 9th day of May, 1997, by FAX, by air express, by hand delivery or by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

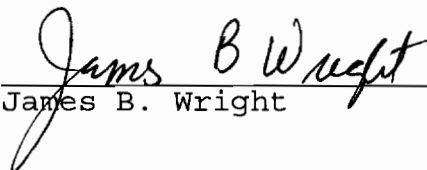
H. Edward Phillips  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505  
FAX 615-741-2336

L. Vincent Williams  
Office of the Attorney General  
Consumer Advocate Division  
426 Fifth Avenue North, 2nd Fl.  
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Richard M. Tettelbaum  
Citizens Telecommunications Company  
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Suite 500, 1400 16th Street, N.W.  
Washington, DC 20036  
FAX 202-483-9277

Guy M. Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300  
FAX 615-214-7406

Val Sanford  
230 Fourth Avenue, North, 3rd Floor  
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Nashville, TN 37219-8888  
FAX 615-256-6339

  
\_\_\_\_\_  
James B. Wright



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United Telephone-Southeast

**OFFICIAL FILE**

**PLEASE**

**DO NOT REMOVE**

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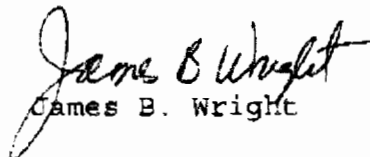
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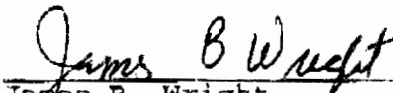
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