

STATE OF TENNESSEE

Office of the Attorney General



JOHN KNOX WALKUP  
ATTORNEY GENERAL AND REPORTER

PATRICIA J. COTTRELL  
CHIEF DEPUTY ATTORNEY GENERAL

MICHAEL E. MOORE  
SOLICITOR GENERAL

CORDELL HULL BUILDING  
NASHVILLE, TN 37243-0485

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

May 15, 1997

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

Re: Proposed Tennessee Regulatory Authority Charges

Dear Mr. Waddell:

Enclosed you will find our proposed Tennessee Regulatory Authority Charges pursuant to Order of the Hearing Officer.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Vincent Williams".

L. Vincent Williams  
Consumer Advocate

**OFFICIAL FILE**  
**PLEASE**  
**DO NOT REMOVE**

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

IN RE: TARIFF FILING BY UNITED	)	
TELEPHONE-SOUTHEAST, INC. TO	)	Docket No. 96-01423
REFLECT ANNUAL PRICE CAP	)	
ADJUSTMENT (TARIFF NO. 96-201)	)	
	)	

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CONSUMER ADVOCATE DIVISION'S PROPOSED CHARGES OF LAW

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Comes the Consumer Advocate Division (ConAd) in accordance with the directive of the hearing officer for all parties to submit proposed charges of law to the hearing officer for the purpose of charging the agency with the law.

1. This contested case arises pursuant to chapter 408 of the 1995 Tennessee Public Acts as codified in Tennessee Code Annotated 65-5-209(e). The Tennessee Regulatory Authority has original jurisdiction to resolve questions of fact and law pursuant to Tennessee Code Annotated 65-5-210(a).
2. When any public utility shall increase any existing individual rates, joint rates, tolls, fares, charges, or schedules thereof, or change or alter any existing classification, the authority shall have power either upon written complaint, or upon its own initiative, to hear and determine whether the increase, change or alteration is just and

reasonable. The burden of proof to show that the increase, change, or alteration is just and reasonable shall be upon the public utility making the same. In determining whether such increase, change or alteration is just and reasonable, the authority shall take into account the safety, adequacy and efficiency or lack thereof of the service or services furnished by the public utility. It shall be the duty of the authority to approve any such increase, change or alteration upon being satisfied after full hearing that the same is just and reasonable. Tenn. Code Ann. § 65-5-203 (a).

3. Administrative bodies, which are created by legislation, do not have the power to make rules or regulations inconsistent with law or to make rules or enact laws affecting or creating substantive rights. *Tasco Developing and Building Corp. v. Long*, 368 S.W.2d 65 (Tenn. App. 1963); *Polk County v. Board of Equalization*, 484 S.W.2d 49.
4. UTSE has the burden of proving that it has properly classified its services for the price regulation plan adjustment.
5. UTSE has the burden of proving that directory assistance was a non-basic service on June 6, 1995.
6. UTSE has the burden of proving that any educational services are

non-basic services.

7. UTSE has the burden of proving that any ABC lines should be classified as non-basic services.
8. UTSE has the burden of proving that 911 Emergency Services are non-basic services.
9. UTSE has the burden of proving that on June 6, 1995 its rate for 5 or more residential lines was the business line rate.
10. UTSE has the burden of proving that its rate for business basic service lines located less than 3/4 mile from its central offices are less than or equal to the rate charged on June 6, 1995.
11. The Consumer Advocate Division has the burden of proving that UTSE has adopted, maintain, or enforce any regulation, practice, or measurement which is unjust, unreasonable, unduly preferential or discriminatory, or that UTSE withholds or refuses any service which can reasonably be demanded and furnished if ordered by the Authority.
12. The Consumer Advocate Division also has the burden of proving that UTSE charges, collects, or receives more than a just and reasonable rate of toll or compensation for residential service of five or more lines in this state and therefore commits extortion

13. The Consumer Advocate Division also has the burden of proving that UTSE charges, collects, or receives more than a just and reasonable rate of toll or compensation for basic service business or residential service less than 3/4 mile from its central office and therefore commits extortion.
14. The Consumer Advocate Division has the burden of proving that UTSE is withholding or refusing to provide ABC Line service.
15. The Consumer Advocate Division has the burden of proving that UTSE is charging more than just and reasonable rates for new customers of what was ABC Line service rates in effect on June 6, 1995.
16. UTSE is estopped from arguing or relying upon an argument that its residential rate for five or more lines on June 6, 1995 or earlier was discriminatory was an undue or unreasonable preference or advantage to any particular person or locality, or any particular description of traffic or service.
17. UTSE is estopped from arguing or relying upon an argument that its rate for ABC/Centrex service less than 3/4 mile from its central office on June 6, 1995 or earlier was discriminatory or was an undue or unreasonable preference or advantage to any particular person or

locality, or any particular description of traffic or service.

18. Rates for telecommunications services are just and reasonable when they are determined to be affordable as set forth in section 65-5-209. Using the procedures established in section 65-5-209, the authority shall ensure that rates for all basic local exchange telephone services and non-basic services are affordable on the effective date of price regulation for each incumbent local exchange telephone company. Tennessee Code Annotated 65-5-209 (a).
19. An incumbent local exchange telephone company shall, upon approval of its application under subsection (c), be empowered to, and shall charge and collect only such rates that are less than or equal to the maximum permitted by this section and subject to the safeguards in § 65-5-208(c) and (d) and the non-discrimination provisions of this title. Tennessee Code Annotated 65-5-209 (b).
20. The authority shall enter an order within ninety (90) days of the application of an incumbent local exchange telephone company implementing a price regulation plan for such company. With the implementation of a price regulation plan, the rates existing on June 6, 1995, for all basic local exchange telephone services and non-basic services, as defined in § 65-5-208, are deemed affordable

if the incumbent local exchange telephone company's earned rate of return on its most recent Public Service Commission 3.01 report as audited by the authority staff pursuant to subsection (j) is equal to or less than the company's current authorized fair rate of return existing at the time of the company's application. If the incumbent local exchange telephone company's earned rate of return on its most recent Public Service Commission 3.01 report as audited by the authority staff pursuant to subsection (j) is greater than the company's current authorized fair rate of return, the authority shall initiate a contested, evidentiary proceeding to establish the initial rates on which the price regulation plan is based. The authority shall initiate such a rate-setting proceeding to determine a fair rate of return on the company's rate base using the actual intrastate operating revenues, expenses, rate base and capital structure from the company's most recent Public Service Commission 3.01 report as audited by the authority staff pursuant to subsection (j). If the incumbent local exchange telephone company's earned rate of return is less than its current authorized fair rate of return, the company may request the authority to initiate a contested, evidentiary proceeding to establish the initial rates upon which the price

regulation plan is based. Upon request by the incumbent local exchange telephone company, the authority shall initiate such a contested, evidentiary proceeding using the same rate-setting procedures described above. Rates established pursuant to the above process shall be the initial rates on which a price regulation plan is based, subject to such further adjustment as may be made by the authority pursuant to § 65-5-207. Tennessee Code Annotated 65-5-209 (c).

21. United Telephone's initial rates were established pursuant to the above process and its initial rates under the process were those it had in effect on June 6, 1995. This is not a proceeding involving further adjustments to a price regulation plan pursuant to § 65-5-207.
22. Incumbent local exchange telephone Subsidiaries subject to price regulation may set rates for non-basic services as the company deems appropriate, subject to the limitations set forth in subsections (e) and (g), the non-discrimination provisions of this title, any rules or orders issued by the authority pursuant to § 65-5-208(c) and upon prior notice to affected customers. Rates for call waiting service provided by an incumbent local exchange telephone company subject to price regulation shall not exceed, for a period of four (4)



years from the date the company becomes subject to such regulation, the maximum rate in effect in the state for such service on June 6, 1995. This is not a proceeding involving rules or orders of the authority pursuant to § 65-5-208(c). Tennessee Code Annotated 65-5-209 (h).

23. A price regulation plan shall maintain affordable basic and non-basic rates by permitting a maximum annual adjustment that is capped at the lesser of one-half ( $1/2$ ) the percentage change in inflation for the United States using the gross domestic product-price index (GDP-I) from the preceding year as the measure of inflation, or the GDP-I from the preceding year minus two (2) percentage points. An incumbent local exchange telephone company may adjust its rates for basic local exchange telephone services or non-basic services only so long as its aggregate revenues for basic local exchange telephone services or non-basic services generated by such changes do not exceed the aggregate revenues generated by the maximum rates permitted by the price regulation plan. Tennessee Code Annotated 65-5-209 (e).
24. Notwithstanding the annual adjustments permitted in subsection (e), the initial basic local exchange telephone service rates of an

incumbent local exchange telephone company subject to price regulation shall not increase for a period of four (4) years from the date the incumbent local exchange telephone company becomes subject to such regulation. At the expiration of the four-year period, an incumbent local exchange telephone company is permitted to adjust annually its rates for basic local exchange telephone services in accordance with the method set forth in subsection (e) provided that in no event shall the rate for residential basic local exchange telephone service be increased in any one (1) year by more than the percentage change in inflation for the United States using the gross domestic product-price index (GDP-I) from the preceding year as the measure of inflation. Tennessee Code Annotated 65-5-209 (f). The expiration of the four-year period for UTSE is midnight October 12, 1999.

25. For any incumbent local exchange telephone company electing price regulation under subsection (c), the authority shall conduct an audit to assure that the Public Service Commission 3.01 report accurately reflects, in all material respects, the incumbent local exchange telephone company's achieved results in accordance with generally accepted accounting principles as adopted in Part 32 of the uniform

system of accounts, and the rate making adjustments to operating revenues, expenses and rate base used in the authority's most recent order applicable to the incumbent local exchange telephone company. Nothing herein is to be construed to diminish the audit powers of the authority. Tennessee Code Annotated 65-5-209 (j).

26. (a) Services of incumbent local exchange telephone Subsidiaries who apply for price regulation under § 65-5-209 are classified as follows:

(1) "Basic local exchange telephone services" are telecommunications services which are comprised of an access line, dial tone, touch-tone and usage provided to the premises for the provision of two-way switched voice or data transmission over voice grade facilities of residential customers or business customers within a local calling area, Lifeline, Link-Up Tennessee, 911 Emergency Services and educational discounts existing on June 6, 1995, or other services required by state or federal statute. These services shall, at a minimum, be provided at the same level of quality as is being provided on June 6, 1995. Rates for these services shall include both recurring and nonrecurring charges.

(2) "Non-basic services" are telecommunications services which are not defined as basic local exchange telephone services and are not exempted under subsection (b). Rates for these services shall include both recurring and nonrecurring charges. Tenn. Code Ann. § 65-5-208(a).

27. If you find that an ABC line or Centrex service was comprised of an access line, dial tone, touch-tone and usage provided to the premises for the provision of two-way switched voice or data transmission over voice grade facilities of residential customers or business customers within a local calling area on June 6, 1995 then you must classify the service as basic local exchange telephone service.
28. No public utility shall adopt, maintain, or enforce any regulation, practice, or measurement which is unjust, unreasonable, unduly preferential or discriminatory, nor shall any public utility provide or maintain any service that is unsafe, improper, or inadequate, or withhold or refuse any service which can reasonably be demanded and furnished when ordered by the authority.
29. The general assembly declares that the policy of this state is to foster the development of an efficient, technologically advanced, statewide system of telecommunications services by permitting competition in

all telecommunications services markets, and by permitting alternative forms of regulation for telecommunications services and telecommunications services providers. To that end, the regulation of telecommunications services and telecommunications services providers shall protect the interests of consumers without unreasonable prejudice or disadvantage to any telecommunications services provider; universal service shall be maintained; and rates charged to residential customers for essential telecommunications services shall remain affordable. Tenn. Code Ann. § 65-4-123.

Residential and business customers are entitled to protection.

30. Any such corporation which charges, collects, or receives more than a just and reasonable rate of toll or compensation for service in this state commits extortion, which is prohibited and declared unlawful. Tenn. Code Ann. § 65-4-122(b).
31. The Tennessee Regulatory Authority has no power or authority to increase any basic service rate unless the increase arises from its decision in a universal service proceeding.
32. The Tennessee Public Service Commission Order in Docket 95-02615, on October 13, 1995, provided in pertinent part that “ IT IS THEREFORE ORDERED THAT the rates in effect as of June 6,

1995 for all Basic Local Exchange Telephone Services (Basic Services) and Non-Basic Services as defined in Section 65-5-208 are affordable and, for these initial rates, price regulation is effective for these purposes upon entry of this Order.”

33. Neither the Tennessee Public Service Commission nor the Tennessee Regulatory Authority approved a UTSE tariff charging business rates for five or more residential lines.
34. If provisions of different titles or chapters of the code appear to contravene each other, the provisions of each title or chapter shall prevail as to all matters and questions growing out of the subject matter of that title or chapter. Tenn. Code Ann. § 1-3-103. Petition to Rehear, denied.
35. One or more of the parties have discussed legislative history including legislation not enacted. I charge you that unenacted legislation is not relevant.
36. Proposed legislation, not enacted, has no consequence whatever upon the interpretation of an existing statute. While such proposed legislation may indicate to some extent some of the individual legislators’ interpretation of an existing statute, it is in no way controlling or, for that matter, relevant, to the Agency’s duty to

properly construe statutes. *Blake v. Abbott*, C.A. No. 03A01-9509-CV-00307, (Tenn. App. Filed, April 24, 1996, Petition to Rehear, denied).

37. Where legislation is amended, rewritten and substituted for prior drafts of legislation legislative statements regarding the prior draft are not controlling or relevant.
38. To the extent any statement made to the General Assembly may be relevant, you must take into consideration the explanation for that statement.
39. The jurisdiction of the Tennessee Regulatory Authority stops short of confiscation or extortion. *New River Lumber Company v. Tennessee Ry. Co.*, 145 Tenn. 206, 295, 238 S.W.2d 867 (1921).
40. The rules of statutory construction are either intrinsic or extrinsic. Intrinsic aids to construction are those which derive meaning from the internal structure of the text and conventional or dictionary meanings of the terms used in it. Extrinsic aids relate to the consideration of background matters. Legislative history, for example, is an extrinsic aid to construction. See, *Sutherland on Statutory Construction*, § 45.14.
41. The courts of Tennessee require reliance on the intrinsic aids to

construction alone where possible. In this regard the most basic rule of statutory construction is to ascertain and give effect to the intention and purpose of the legislature. *Worrall v. Kroger Co.*, 545 S.W.2d 736 (Tenn. 1977). Legislative intent or purpose is to be ascertained primarily from the natural and ordinary meaning of the language used, without forced or subtle construction that would limit or extend the meaning of the language. *National Gas Distributors, Inc. v. State*, 804 S.W.2d 66 (Tenn. 1991).

42. Subtle means 1.a. So slight as to be difficult to analyze: ELUSIVE. b. Not immediately clear: ABSTRUSE. 2. Capable of making fine distinctions. 3.a. Skillful or ingenious: CLEVER. b. Marked by craft or slyness: DEVIOUS. C. Operating in a hidden and usually injurious way: INSIDIOUS.
43. A determination of the meaning of a statute occurs through application of the ordinary rules of American grammar, syntax and punctuation unless such a determination is impossible. *Anderson v. Aluminum Co. of America*, 193 Tenn. 106, 241 S.W.2d 932 (1951). Where legislation is free of contradiction and ambiguity, this agency is not at liberty to depart from the words of the statute because of the justice of a particular case or supposed legislative intent. *Carson*



*Creek Vacation Resorts, Inc. v. Department of Revenue*, 865 S.W.2d 1(Tenn. 1993).

. . . if [the legislative intent] is expressed in a manner devoid of contradiction and ambiguity, there is no room for interpretation or construction, and the judges and agency members are not at liberty, on consideration of policy or hardship, to depart from the words of the statute; that they have no right to make exceptions or insert qualifications, however abstract justice or the justice of a particular case may require. *Austin v. Memphis Publishing Company*, 655 S.W.2d 146, 148 (Tenn. 1983), quoting *Heiskell v. Lowe*, 126 Tenn. 475, 153 S.W. 284, 290 (1912).

44. Statutory construction is essentially a judicial or quasi-judicial function. *Worley v. Weigel's, Inc.*, 919 S.W.2d 589, 592 (Tenn. 1996); *Roseman v. Roseman*, 890 S.W.2d 27, 29 (Tenn. 1994). It refers to the process by which the courts or an agency ascertain and then give the fullest possible effect to a statute's purpose. *Cronin v. Howe*, 906 S.W.2d 910, 912 (Tenn. 1995); *Wilson v. Johnson County*, 879 S.W.2d 807, 809 (Tenn. 1994). When called upon to construe a statute, the courts must take care not to unduly restrict the

statute's application or conversely to expand its coverage beyond its intended scope. *Kultura, Inc. v. Southern Leasing Corp.*, 923 S.W.2d 536, 539 (Tenn. 1996); *In re Storey (Storey v. Bradford Furniture Co.)*, 910 S.W.2d 857, 859 (Tenn. 1995); *In re Conservatorship of Clayton (Salvatore v. Clayton)*, 914 S.W.2d 84, 90 (Tenn. Ct. App. 1995).

45. The search for a statute's purpose necessarily begins with the words of the statute itself. *Spencer v. Towson Moving & Storage, Inc.*, 922 S.W.2d 508, 510 (Tenn. 1996); *Winter v. Smith*, 914 S.W.2d 527, 538 (Tenn. Ct. App. 1995). For, unless the legislature signals otherwise, we assign these words their natural and ordinary meaning. *State ex rel. Metro. Gov't v. Spicewood Creek Watershed Dist.*, 848 S.W.2d 60, 62 (Tenn. 1993). Courts consider not only the immediate context in which the words appear, *McClain v. Henry I. Siegel Co.*, 834 S.W.2d 295, 296 (Tenn. 1992), but also the statute's overall purposes and established public policy. *State v. Turner*, 913 S.W.2d 158, 160 (Tenn. 1995) (consideration of the statute's overall purposes); *Cronin v. Howe*, 906 S.W.2d at 912 (consideration of public policy).
46. When possible, [an agency] must avoid constructions that render any

part of a statute inoperative or void, *Tidwell v. Collins*, 522 S.W.2d 674, 676-77 (Tenn. 1975); *Mangrum v. Owens*, 917 S.W.2d 244, 246 (Tenn. Ct. App. 1995), or that place one statute in conflict with another. *State ex rel. Boone v. Sundquist*, 884 S.W.2d 438, 444 (Tenn. 1994); *State ex rel. Metro. Gov't v. Spicewood Creek Watershed Dist.*, 848 S.W.2d at 62.

47. When, however, a statute is ambiguous or unclear, courts may resort to the various rules of statutory construction to ascertain its purpose and the proper scope of its application. No single rule of construction is preferable to the others, and thus it brings all applicable rules to bear in order to ascertain a statute's meaning and application. *O.H. May Co. v. Anderson*, 156 Tenn. 216, 219-20, 300 S.W. 12, 14 (1927); *Davenport v. Chrysler Credit Corp.*, 818 S.W.2d 23, 27 (Tenn. Ct. App. 1991).
48. In addition, the TRA is required to give each word its common and ordinary meaning. In this regard you are to give the term “usage” its natural and ordinary meaning.  
  
The term “usage” is defined as follows:
  - 1.a. The act, manner, or amount of using; use: *water usage*.
  - b. The act or manner of treating;

2. A usual, habitual, or accepted practice. See Syns at **habit**.<sup>1</sup>

**American Heritage College Dictionary**, Third Edition,  
Houghton-Mifflin Company, (1993).

1. The act or manner of using or treating. 2. Customary and  
accepted practice or procedure.

**Webster's II, New Riverside University Dictionary**,  
Houghton-Mifflin Company, (1994).

A reasonable and lawful public custom in a locality  
concerning particular transactions which is either known to  
the parties, or so well established, general, and uniform that  
they must be presumed to have acted with reference thereto.

Practice in fact.

Habitual or customary practice which prevails within  
geographical or sociological area, and is course of conduct  
based upon series to actual occurrences, and in order to be  
controlling upon parties to contract, it must be adopted by  
them, or be well known to parties or to persons in their  
circumstances.

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<sup>1</sup>Habit- 1.a. a recurrent, often unconscious pattern of behavior acquired through frequent repetition. 2.  
Customary manner or practice.

**Black's Law Dictionary**, Sixth Edition, West Publishing Company (1990).

49. Usage is a repetition of acts and is a fact. Usage, by constant repetition, general use, and antiquity, develops into custom, and custom, when fully developed, is a law. *United States v. Guy H. James*, 390 F. Supp. 1193, 1209-1210 (M.D. Tenn 1972); citing, *American Lead Pencil Company v. Nashville Chattanooga & St. Louis Railway*, 124 Tenn. 57, 64-65, 134 S.W. 613, 615, 32 L.R.A., N.S. 323 (1910). See, also, Sutherland on Statutory Construction § 47.21 (In order to prevent their rejection as surplusage, general words take an unrestricted meaning on the ground that the legislature, by the addition of general words to an exhaustive enumeration, must have intended that they have meaning outside the class.).
50. If the act or manner of treating directory assistance on June 6, 1995 was as a toll free component of basic service or the usual, habitual, or accepted practice was to treat directory assistance as a toll free component of basic service or the reasonable and lawful public custom in the UTSE locality concerning basic service on June 6, 1995 known to the parties, or so well established, general, and

uniform that parties must be presumed to have acted with reference thereto was that directory assistance was a toll free component of basic service, then you must find that toll free directory assistance was usage on June 6, 1995 and is therefore a basic service.

51. You must also give the term “quality” its natural and ordinary meaning.
52. The “Quality” of basic service can also include DA. Quality is the essential character of a service. **Webster’s II, New Riverside University Dictionary**. It is descriptive of the composition of substance... definitive of character, nature and degree of excellence of an article. In pleading, it means an attribute or characteristic by which one thing is distinguished from another. **Black’s Law Dictionary**.
53. While directory assistance is not among the basic services specifically enumerated in Tenn. Code Ann. § 65-5-208(a) it is clear that the enumeration of basic services is not exclusive or limited to only those services enumerated. See, *Blake v. Abbott Laboratories*, C.A. No. 03A01-9509-CV-00307, filed April 24, 1996 (Tenn. App.).
54. "911 service" means regular 911 service enhanced universal emergency number service or enhanced 911 service which is a


telephone exchange communications service whereby a public safety answering point may receive telephone calls dialed to the telephone number 911. "911 service" includes lines and may include the equipment necessary for the answering, transferring and dispatching of public emergency telephone calls originated by persons within the serving area who dial 911, but does not include dial tone first from pay telephones which may be made available by the service provider based on the ability to recover the costs associated with its implementation and consistent with tariffs filed with the Tennessee regulatory authority. Tenn. Code Ann. § 7-86-103(11).

55. In determining whether UTSE's services are properly classified you may take official notice of all UTSE tariffs and contract terms in effect on June 6, 1995 relating to the issues in dispute. I further charge you as a minimum that the following UTSE tariffs were in effect on June 6, 1995: U2.3; U13.18; U21; Educational discounts including special contract discounts appeared in numerous places in UTSE's tariffs on June 6, 1995. You may further take official notice that UTSE now serve existing customers of ABC Line services under the terms and conditions of U100.11. You may further take official notice that UTSE requires new customers of ABC Line type services

to meet the terms and conditions and pay the rates under tariff U13.27.

56. In determining whether UTSE is withholding or refusing to provide ABC Lines to new customers you may take official notice of the Authority's records which show that UTSE sought to obsolete the ABC Line tariff but continues to serve existing customers.
57. Your decision can not be based upon speculation, surmise, or conjecture.

Respectfully submitted,



L. Vincent Williams

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice has been faxed and or mailed postage prepaid to the parties listed below this 15th day of May, 1997.

James B. Wright, Esq.  
United Telephone-Southeast, Inc.  
14111 Capital Blvd.  
Wake Forest, NC 27587-5900

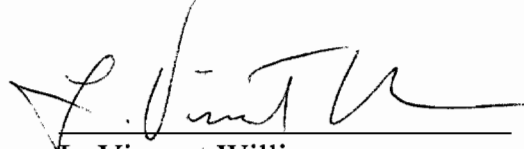
Val Sanford, Esq.  
230 Fourth Avenue, North, 3rd Floor  
Post Office Box 198888  
Nashville, TN 37219-8888

Guy M. Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

Richard M. Tettlebaum, Esq  
Citizens Telecom  
1400 16th Street N.W., Suite 500  
Washington, DC 20036



H. LaDon Baltimore, Esq.  
211 Seventh Avenue North  
Suite 320  
Nashville, TN 37219-1823



L. Vincent Williams