

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

'97 MAY 19 8 11 04
IN RE: TARIFF FILING BY UNITED)
TELEPHONE-SOUTHEAST, INC. TO) DOCKET NO. 96-01423
REFLECT ANNUAL PRICE CAP)
ADJUSTMENT (TARIFF NO.96-201))

OBJECTIONS TO PROPOSED CHARGES OF LAW

Comes the Consumer Advocate Division (ConAd) to respectfully object to proposed charges of law submitted by UTSE and BellSouth. For cause ConAd would show:

1. That under UTSE's topic "General", the first paragraph contains an inaccurate statement of law to which ConAd objects.
2. That under UTSE's topic "General", the second paragraph second sentence contains an inaccurate statement of law by leaving out consideration of matters officially noticed.
3. That under UTSE's topic "General", the second paragraph, third sentence contains an inaccurate statement because no evidence was accorded minimal weight.
4. That under UTSE's topic "General", the second paragraph, fourth sentence is erroneous because it uses the term "statements" instead of arguments.
5. That under UTSE's topic "BASIC OR NON-BASIC SERVICE", the fourth paragraph, first sentence is inaccurate because the parties contested more than mere "access to emergency 911 services". In addition the parties contested the classification of 6 or more residential lines as business lines, and the classification of Centrex service.
6. That under UTSE's topic "BASIC SERVICE" the fifth paragraph, is an incorrect

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statement of the law.

7. That under UTSE's topic "BASIC OR NON-BASIC SERVICE", the sixth paragraph is an incorrect statement of the law.
8. That under UTSE's topic "BASIC OR NON-BASIC SERVICE", the seventh paragraph, the third sentence beginning with "Since..." Is an incorrect statement of law.
9. That under UTSE's topic "PREVIOUSLY APPROVED TARIFFS", the first paragraph, second sentence part (a) is an incorrect statement of fact and law.
10. That under UTSE's topic "PREVIOUSLY APPROVED TARIFFS", the second paragraph, first sentence is an incorrect statement of law since the scope encompasses all matters presented in evidence.
11. That under UTSE's topic "PREVIOUSLY APPROVED TARIFFS", the second paragraph, second sentence part "(b)" is an incorrect statement of law since the standards are set by the entire statute.
12. That under BellSouth's proposed charges the "exclusive authority and exclusive judges" language is an incorrect statement of law.

Wherefore, the Consumer Advocate Division prays that the Hearing Officer does not charge the agency with UTSE or BellSouth's proposed charges.

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 ____ day of May, 1997.


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