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Décember 12, 1996

David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37201

96-01423

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Tariff Filing by UTSE to Reflect Annual Price Cap Adjustment, Tariff No. 96-201

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen (13) copies of the petition of AT&T Communications of the South Central States, Inc. for leave to intervene in this matter. Also enclosed is our check in the amount of \$25.00 in payment of the filing fee.

Copies are being served on counsel of record.

Yours very truly,

Val Sanford

VS:ka Enclosures

James B. Wright, Esq. cc: Guy M. Hicks, Esq.

Richard M. Tettelbaum, Esq. James P. Lamoureux, Esq.

Garry Sharp

## BEFORE 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

# PETITION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC. FOR LEAVE TO INTERVENE

AT&T Communications of the South Central States, Inc., pursuant to T.C.A. §§ 4-5-310 and 65-2-107, respectfully moves for leave to intervene in this proceeding as its interests may appear; and for grounds states that:

- 1. AT&T Communications of the South Central States, Inc. (here "AT&T") is a Delaware corporation, duly authorized to do business in Tennessee, and doing business in Tennessee intrastate commerce as an interexchange carrier, and authorized to do business in Tennessee intrastate commerce as a competing telecommunications service provider, pursuant to certificates of convenience and necessity issued by the Tennessee Public Service Commission.
- 2. AT&T is a customer of United Telephone-Southeast, Inc. (here "UTSE") for basic, non-basic and interconnection services; and is authorized, as a competing telecommunications service provider to provide competing local services.
- 3. The legal rights, duties or other legal interests of AT&T may be determined in this proceeding, not only as to UTSE, but as a precedent with respect to other incumbent local

#### CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that I have served a copy of the foregoing Petition of AT&T Communications of the South Central States, Inc. for Leave to Intervene on counsel of record by facsimile transmission, this 12th day of December, 1996, as follows:

James B. Wright, Esq.
United Telephone-Southeast, Inc.
14111 Capital Boulevard
Wake Forest, NC 27587-5900
Fax No. (919) 554-7913

Guy M. Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300
Fax No. (615) 214-7406

L. Vincent Williams, Esq. Consumer Advocate Cordell Hull Building Second Floor 426 Fifth Avenue North Nashville, TN 37243-0500 Fax No. (615) 532-5683

Richard M. Tettelbaum, Esq. Citizens Telecom Suite 500 1400 16th Street N.W. Washington, DC 20036 Fax No. (202) 483-9277 exchange telephone companies operating under price regulation plans. AT&T qualifies as an intervenor under T.C.A. §§ 4-5-310 and 65-2-107.

- 4. This matter has not proceeded to a point where the interests of justice in allowing all interested parties an opportunity to be heard and to participate in the proceeding as their interests may appear; and the prompt conduct of the proceeding will not be impaired by allowing this intervention.
- 5. AT&T should be given leave to intervene and to receive copies of all notices, orders or other filings in this matter.

### THE PREMISES CONSIDERED, THE PETITIONER PRAYS THAT:

- 1. AT&T Communications of the South Central States, Inc. be given leave to intervene in this case as its interests may appear;
- 2. It have such other, further and general relief as the justice of its cause may require.

Val Sanford, #3316

John Knox Walkup, #7776

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Attorneys for AT&T Communications of the South Central States, Inc.