

LAW OFFICES

GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

230 FOURTH AVENUE, NORTH, 3RD FLOOR
POST OFFICE BOX 198888
NASHVILLE, TENNESSEE 37219-8888

TELEPHONE (615) 244-4994

FACSIMILE (615) 256-6339

GARETH S. ADEN
LAWRENCE R. AHERN III
G. RHEA BUCY
GEORGE V. CRAWFORD, JR.
GEORGE V. CRAWFORD III
A. SCOTT DERRICK
THOMAS H. FORRESTER
MARCY S. HARDEE
M. TAYLOR HARRIS, JR.
DAN HASKELL
ANDRA J. HEDRICK
DAVID W. HOUSTON IV
LINDA W. KNIGHT
JOEL M. LEEMAN
ALLEN D. LENTZ
JOSEPH MARTIN, JR.
JEFFREY MOBLEY

KATHRYN H. PENNINGTON
WM. ROBERT POPE, JR.
WAYNE L. ROBBINS, JR.
JACK W. ROBINSON, JR.
JACK W. ROBINSON, SR.
VALERIUS SANFORD
MARTY S. TURNER
WESLEY D. TURNER
PHILLIP P. WELTY
JOHN D. LENTZ
OF COUNSEL
B. B. GULLETT
1905-1992

November 28, 2000

VIA HAND DELIVERY

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

Re: *Rulemaking Proceeding – Regulatory Reform Rules*
Regarding Interexchange Carriers – Rules 1220-4-2-.55(2)
Docket No. 98-00097

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Request of AT&T Communications of the South Central States, Inc. for the TRA to issue a concise statement of the principal reasons for its action in adopting rules revising Rule 1220-4-2-.55(2) pursuant to T.C.A. §4-5-205(b), and for the TRA to provide the summaries of factual information as required by T.C.A. §4-5-204(a)(4).

A copy of this Request has been served upon all known counsel of record.

Yours very truly,


Val Sanford

VS/ghc
Enclosures

David Waddell
November 28, 2000
Page 2

cc: Susan Berlin, Esq.
Charles B. Welch, Jr., Esq.
Vance Broemel, Esq.
Jon E. Hastings, Esq.
James Wright, Esq.
James P. Lamoureux, Esq.
Garry Sharp

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: *Rulemaking Proceeding – Regulatory Reform Rules
regarding Interexchange Carriers – Rules 1220-4-2-.55(2)*

Docket No. 98-00097

REQUEST OF AT&T COMMUNICATIONS
OF THE SOUTH CENTRAL STATES, INC.

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to T.C.A. §4-5-205(b) hereby requests the Tennessee Regulatory Authority to issue a concise statement of the principal reasons for its action in adopting rules revising Rule 1220-4-2-.55(2).

In addition, T.C.A. §4-5-204(a)(4) provides:

At the beginning of each hearing, if the agency has made a proposal, the agency shall present a summary of the factual information on which its proposal is based, including any information obtained through the use of advisory committees or as a result of informal conferences or consultation.

The rules as proposed in the Notice of Rulemaking, and the rules as adopted by the TRA, were proposed by the TRA. No such summary of factual information was presented at the rulemaking hearing with respect to the rules as proposed in the notice, and no such summary of factual information was presented at any time as to the rules as adopted.

AT&T requests that the TRA provide such summaries of factual information.

Respectfully submitted,



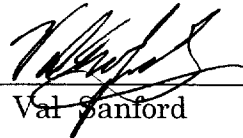
Val Sanford, #3316
GULLETT, SANFORD, ROBINSON & MARTIN, PLLC
230 Fourth Avenue North, 3rd Floor
P.O. Box 198888
Nashville, TN 37219-8888
(615) 244-4994

James P. Lamoureux, Esq.
AT&T
Room 4068
1200 Peachtree Street N.E.
Atlanta, GA 30309
(404) 810-4196

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

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that a copy of the foregoing Request of AT&T Communications of the South Central States, Inc. was served on the following persons via United States Mail, Postage prepaid and addressed as follows, this 28th day of November, 2000.



Val Sanford

Vance L. Broemel
Assistant Attorney General
Consumer Advocate Division
425 5th Avenue, North
Nashville, TN 37243

Jon Hastings
Boult, Cummings, Connors & Berry
P. O. Box 198062
Nashville, TN 37219

Susan Berlin
MCI Telecommunications
d/b/a MCI WorldCom
6 Concourse Parkway
Atlanta, GA 30328

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

Charles B. Welch
511 Union Street
Suite 2400
Nashville, TN 37219