

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

IN RE: )  
)  
COMPLAINT OF INTERMEDIA )  
COMMUNICATIONS, INC. AGAINST )  
BELLSOUTH TELECOMMUNICATIONS, )  
INC. TO ENFORCE THE RECIPROCAL )  
COMPENSATION REQUIREMENT OF )  
THE PARTIES' INTERCONNECTION )  
AGREEMENT )

Docket No. 20-0028

EXECUTIVE SECRETARIAT  
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**COMPLAINT TO ENFORCE INTERCONNECTION AGREEMENT**

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Intermedia Communications, Inc. ("Intermedia"), through undersigned counsel, pursuant to the Tenn. Code Ann. § 65-4-104 and 65-4-117, and Tenn. Comp. R. & Regs. 1220—1—11—.05, files this Complaint against BellSouth Telecommunications, Inc. ("BellSouth") to enforce the reciprocal compensation requirement of its interconnection agreement with BellSouth as to the termination of local traffic to Internet Service Providers ("ISPs"). Because of the prior Orders of the Tennessee Regulatory Authority ("Authority") on this issue and the continuing damage caused by BellSouth's refusal to fulfill its obligations, Intermedia respectfully requests that consideration of this Complaint be expedited.

In support of this Complaint, Intermedia shows the Authority that:

**I. PARTIES**

1. Intermedia is a corporation organized and existing under the laws of the state of Delaware, maintaining its principal place of business at 3625 Queen Palm Drive, Tampa, Florida 33619. Intermedia was granted authority to provide competitive local exchange services in