BEFORE THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE

	MORRE 19 11 66	
IN RE: PETITION OF BELLSOUTH TO IMPLEMENT NEW AND INCREASE EXISTING LATE PAYMENT CHARGES) Docket No. 00-0004))	1
)	

DISCOVERY REQUESTS TO BELLSOUTH TELECOMMUNICATIONS

Comes Paul G. Summers, the Attorney General & Reporter, through the Consumer Advocate and Protection Division of the Office of Attorney General, in the public interest, and propounds the following discovery requests by incorporating by reference the discovery requests filed on October 3, 2000, with the exception of the deposition notice to Patrick Turner. In addition the Attorney General propounds the following Interrogatory:

Quote verbatim the provisions in the third-party billing arrangements which provide for accessing a late charge or prohibit same. For each provision so quoted provide the name and address of the company involved, the start date and expiration date of the contract or tariff involved, and any communications directed toward consumers evidencing notice of these arrangements to consumers.



Respectfully submitted,

PAUL G. SUMMERS, 6285 Attorney General & Reporter

TIMOTHY C. PHILLIPS, 12751 YANCE L. BROEMEL, 11421

Assistant Attorney General

Office of the Attorney General & Reporter Consumer Advocate and Protection Division 425 5th Avenue North, 2nd Floor Nashville, Tennessee 37243 (615) 741-3533

CERTIFICATE OF SERVICE

The undersigned hereby certifies that an exact copy of the foregoing document was served via facsimile transmittal and mailed, postage prepaid, to Guy Hicks, Esq., BellSouth Telecommunications Co., 333 Commerce Street, Suite 2101, Nashville, TN 37201-3300, on November 16, 2000.

Timothy C. Phillips, Esq.

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