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H. LaDon Baltimore
T.R.A. DOCKET ROOM

July 1, 2003

Tennessee Regulatory Authority
ATTN: Sharla Dillon
460 James Robertson Parkway
Nashville, TN 37238

Re: Complaint of Ben Lomand Communications, Inc. against Citizens Communications Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee;
Docket No. 02-01221

Dear Chairman Kyle:

I am enclosing with this letter Ben Lomand Communications, Inc.'s second set of discovery requests to Citizens Communications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,



H. LaDon Baltimore
Ben Lomand Communications, Inc.

LDB/dcg
Enclosure

cc: Levoy Knowles
Don Woods
Guilford Thornton, Jr., Esq.

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

IN RE:

**COMPLAINT OF BEN LOMAND
COMMUNICATIONS, INC. ,**

Against

**CITIZENS COMMUNICATIONS
COMPANY OF TENNESSEE LLC,
d/b/a FRONTIER COMMUNICATIONS
OF TENNESSEE.**

DOCKET NO. 02-01221

**SECOND
REQUEST FOR DISCOVERY FROM BEN LOMAND COMMUNICATIONS, INC.
TO CITIZENS COMMUNICATIONS COMPANY OF TENNESSEE, LLC d/b/a
FRONTIER COMMUNICATIONS OF TENNESSEE**

Complainant, Ben Lomand Communications, Inc. ("Ben Lomand"), hereby propounds the following second set of discovery requests to Citizens Communications of Tennessee, LLC, d/b/a Frontier Communications of Tennessee ("Citizens" or "Frontier") to be answered in a manner consistent with the Rules of the Tennessee Regulatory Authority.

I. DEFINITIONS AND INSTRUCTIONS

1. For the purposes of these data requests, the following definitions shall apply:

"Exhibit ____" refers to exhibits attached to the "Additional Proprietary & Confidential Supplemental Response of Citizens Telecommunications Company of Tennessee, LLC to Discovery Requests of Ben Lomand Communications, Inc." filed June 16, 2003.

"Documents" is used in the broadest sense and includes all tangible things that record information. "Documents" specifically includes, when requesting data responses regarding

cost studies or cost information, a functioning electronic copy of the analysis populated with all inputs and assumptions used by Citizens that will permit Ben Lomand to duplicate the results. "Documents" includes both the original and any copy or draft, and all copies which contain any notation not on the original. Examples of "documents" include, but are not limited to, handwritten, typed or printed papers, handwritten notations, office notes, calendar entries, diaries, notes of telephone conversations, photographs, reports, receipts, invoices, memoranda, correspondence, notes, ledger entries, work papers and computer printouts, cards, tapes, disks, and other means of electronically or magnetically maintained information.

"Identify" means (1) when used with reference to a natural person, give the person's full name, business or residence address, business or residence telephone number, occupation and employer; (2) when used with reference to an entity, give the entity's full name, address and telephone number; (3) when used with reference to a document, give the document's date, title, author, recipient, type (e.g., letter, memorandum, note, etc.), name of the custodian of the document, and a description of the contents with sufficient specificity to be the basis for discovery; and (4) when used with reference to an action taken by an entity, identify the person(s) taking the action, describe the nature of the action, and give the date on which the action was taken. If any action identified pursuant to (4) involved a communication with another person, identify the person(s) with whom the actor(s) communicated; and, if the communication was through the use of a document, identify the document through which the communication was made.

"Person" includes a natural person, partnership, joint venture, firm, corporation, association, organization, or any other type of business or legal entity.

"CLEC" means a competitive local exchange carrier.

"ILEC" means an incumbent local exchange carrier.

"LEC" means a local exchange carrier, including but not limited to CLECs and ILECs.

"April 11, 2002 Tariff" means the Frontier tariff filed with the Tennessee Regulatory Authority on April 11, 2002 for the McMinnville and Sparta exchanges and which is the subject of the complaint filed by Ben Lomand in this docket.

"Ben Lomand" means Ben Lomand Communications, Inc.

"Frontier" means Citizens Communications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee and any affiliated company.

2. If the answers to any of the following data requests could be provided through the production of existing documents within Frontier's possession or control, or within the possession or under the control of any of its representatives, including its attorneys, Ben Lomand will accept such production in lieu of written answers to any such data requests.

3. Provide the names, addresses and positions of each person responsible for preparing each of the answers to the following data requests, and for each person providing information used in the preparation of each answer.

4. If you maintained that any document or record which refers to or relates to anything about which these data requests ask or that would be responsive to any of the data requests has been destroyed, set forth the contents of said document, the location of any copies of said document, the date and circumstances of said destruction and the name of the person who ordered or authorized such destruction.

5. In answering these data requests, furnish all information and responsive documents in the possession of Frontier or in the possession of any director, officer, employee, agent, representative, or attorney of Frontier.

6. If you cannot answer any data request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of a data request, you should so state, describing in full your efforts to obtain the information requested, and then proceed to answer to the fullest extent possible.

7. When the information requested by a data request varies over time, state the response for each period of time as to which the response differs, and identify the time periods applicable to each portion of the response.

8. Where the data requested, including but not limited to cost studies and related information, is or can be made available on CD ROM, please provide the documentation on CD ROM. Where both public and proprietary versions of said cost studies exist, please provide both public and proprietary versions of all cost studies.

9. Where Frontier believes a document that is responsive to these data requests is protected by attorney-client privilege, a privilege log listing the date of the document, title, author, recipients, type (e.g., letter, memorandum, note, etc.), name of the custodian of the document, and a description of the contents with sufficient specificity to be the basis for analyzing Frontier's claim of privilege should be provided.

10. If you are unable to answer any interrogatory fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such interrogatory as fully and completely as you can and to specify those portions which you are unable to answer in

such interrogatory. In addition to specifying those portions, you are to state with regard to such portion:

- (a) the facts on which you base the contention that you are unable to answer that portion;
- (b) the knowledge, information, and belief you have concerning that portion;
- (c) the acts done and inquiries made by you in attempting to answer such interrogatory.

11. With regard to the Requests for Admissions, if you are unable to admit or deny each statement fully and completely after exercising due diligence to make inquiry and to secure information, you are to admit or deny such statement as fully and completely as you can and to specify the portions which you are unable to admit or deny. In addition to specifying those portions, you are to set forth with regard to such portion(s):

- (a) the facts on which you base the contention that you are unable to answer that portion;
- (b) the knowledge, information, and belief you have concerning that portion;
- (c) the acts done and inquiries made by you in attempting to fully respond.

II. DATA REQUESTS

1. For the current month, year-to-date, and 12 months-to-date values indicated in Exhibit 1, page 1 of 5, line 1 denominated "Local Network Operating Revenues," indicate the amount (by either absolute value or as a percentage of the total) of local network operating revenues derived from business, rather than residential, customers.

ANSWER:

2. For the current month, year-to-date, and 12 months-to-date values indicated in Exhibit 1, page 1 of 5, line 5 denominated "Less: Uncollectibles" associated with operating revenue, indicate the amount (by either absolute value or as a percentage fo the total) of uncollectibles associated with operating revenues derived from the "Local Network" category (line 1).

ANSWER:

3. For the current month, year-to-date, and 12 months-to-date values indicated in Exhibit 1, page 1, line 5 denominated "Less: Uncollectibles" associated with operating revenues, indicate the amount (by either absolute value or as a percentage of the total) of uncollectibles associated with operating revenues derived from business, rather than residential, customers.

ANSWER:

4. Does the information presented in Exhibit 1, page 1 of 5, reflect any funds received by Citizens from either federal or state universal service funds?

(a) If yes, provide the information shown on such page exclusive of universal service funds;

(b) If no, provide the information shown on such page inclusive of universal service funds.

ANSWER:

5. Provide a listing of all tariffed services that have been included in Exhibit 1, page 3 of 5, in the "B1" category of access lines.

ANSWER:

6. Provide a listing of all tariffed services that have been included in Exhibit 1, page 3 of 5, in the "CENTREX" category of access lines.

ANSWER:

7. In Exhibit 3, unnumbered page 2 ("Versaline" in bold in upper left corner), for the block of information entitled "Versaline Proposed Centrex," provide a detailed description of the intended meaning of the entries "Discount = \$1.00/Line" and "Discount = \$2.00/Line."

- (a) Explain in detail how the values in these cells were developed.
- (b) Provide any cost information, including all supporting workpapers and documentation that Citizens either relied upon when developing these values or believes supports the use of these values.
- (c) Provide the date this document was created.

ANSWER:

8. In Exhibit 3, unnumbered page 2 ("Versaline" in bold in upper left corner), for the block of information entitled "Flat Rate Proposed," provide a detailed description of the intended meaning of the entries "Disc = \$.50/Line" (three occurrences) and "Disc = \$1.00/Line" (one occurrence).

- (a) Explain in detail how the values in these cells were developed.
- (b) Provide any cost information, including all supporting workpapers and documentation that Citizens either relied upon when developing these values or believes supports the use of these values.

ANSWER:

9. In Exhibit 3, unnumbered page 2 (“Versaline” in bold in upper left corner), for the block of information entitled “Versaline Proposed Centrex,” a pair of columns collectively entitled “Versaline Eff. Rate” appears. Explain in detail what the entries in these columns are intended to represent.

- (a) Explain in detail how the values associated with the entry “line” differ for the “6 month,” “1 yr,” “2 yr,” and “3 yr” scenarios.
- (b) Provide any cost information, including all supporting workpapers and documentation that Citizens either relied upon when developing these values or believes supports the use of these values.

ANSWER:

10. In Exhibit 3, unnumbered page 2 (“Versaline” in bold in upper left corner), within the block of information entitled “Flat Rate Proposed,” a pair of columns collectively entitled “Eff. Rate” appears. Explain in detail what the entries in these columns are intended to represent.

- (a) Explain in detail how the values associated with the entry “line” differ for the “6 month,” “1 yr,” “2 yr,” and “3 yr” scenarios.
- (b) Provide any cost information, including all supporting workpapers and documentation that Citizens either relied upon when developing these values or believes supports the use of these values.

ANSWER:

11. For Exhibit 3, unnumbered page 3 (no title), explain in detail what the information on this page is intended to show.

- (a) Explain in detail why the information on this page was collected and compiled in this manner.
- (b) Provide the date that this document was created.

ANSWER:

12. For Exhibit 6, unnumbered page 4 ("Versaline" in bold in upper left corner), provide the date that this document was created.

ANSWER:

13. For Exhibit 6, unnumbered page 5 (no title), provide the date that this document was created.

ANSWER:

14. For Exhibit 11, page 1, provide a complete definition of the following terms as used on this page:

- (a) B1;

- (b) MNVL;
- (c) SPTA; and
- (d) Centrex.

ANSWER:

15. For Exhibit 11, pages 2-3 ("Centrex Services Loop Investment") and 4-5 ("B1 Services Loop Investment"), provide a complete description of the cost model or models used to develop the values in columns (a), (b), and (d) on pages 2 and 4 and column (c) on pages 3 and 5. Provide a functioning electronic copy of all models, populated with the inputs and assumptions used to develop the values in columns (a), (b), and (d) on page 2 and column (c) on pages 3 and 5.

ANSWER:

16. For Exhibit 11, pages 2-3 ("Centrex Services Loop Investment"), identify the universe of local loops used to develop the values on these pages, and explain in detail why this specific subset of Citizens' loops was chosen for this study.

ANSWER:

17. For Exhibit 11, pages 4-5 ("B1 Services Loop Investment") identify the universe of local loops used to develop the values on these pages and explain in detail why this specific subset of Citizens' loops was chosen for this study.

ANSWER:

18. For Exhibit 11, pages 2-3 ("Centrex Services Loop Investment") and pages 4-5 ("B1 Services Loop Investment"), explain in detail what the term "LRIC" is intended to mean on these pages.

(a) Is Citizens' use of the term "LRIC" on these pages intended to be equivalent to the term "long run incremental costs" as this term is used in Tenn. Code Ann. § 65-5-208(c)?

ANSWER:

19. For Exhibit 11, page 6 ("All Services Loop Investment"), provide a complete description of the cost model or models used to develop the values in columns (a), (b), (c), and

(d). Provide a functioning electronic copy of all such models, populated with the inputs and assumptions used to develop the values in columns (a), (b), (c), and (d).

ANSWER:

20. For Exhibit 12, page 1, provide a complete description of the term "termination charges" as it is being used on this page. Provide any cost information, including all supporting workpapers and documentation, that Citizens either relied upon when developing the value of the "termination charge" or believes supports the use of the value of the "termination charge."

ANSWER:

Respectfully submitted,



H. LaDon Baltimore, BPR #003836

FARRAR & BATES, L.L.P.

211 Seventh Avenue North, Suite 420

Nashville, TN 37219

(615) 254-3060


(615) 254-9835 FAX

Counsel for Ben Lomand Communications, Inc.

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded via facsimile transmission, overnight delivery, or U. S. Mail, first class postage prepaid, to the following, this 1st day of July, 2003.

Guilford Thronton, Jr., Esq.
Stokes, Bartholomew, Evans & Petree
424 Church Street, Suite 2800
Nashville, TN 37219


H. LaDon Baltimore