BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition for Exemption of Certain Services*

Docket No. 03-00391

AT&T OF THE SOUTH CENTRAL STATES, LLC

RESPONSES TO BELLSOUTH TELECOMMUNICATIONS, INC.'S

FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

AT&T Communications of the South Central States, LLC ("AT&T") hereby submits the following responses to the First Interrogatories and First Request for Production of Documents of BellSouth Telecommunications, Inc. ("BellSouth") filed in this docket on August 2, 2004.

GENERAL OBJECTIONS

1. AT&T objects to the definitions and instructions contained in the data requests for production to the extent that the definitions and instructions attempt to impose on AT&T a burden or obligation greater than that required by the Tennessee Rules of Civil Procedure and applicable statutes and regulations governing contested case hearings

2. AT&T objects to the data requests to the extent they call for information and the production of documents which are protected from disclosure by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or protection AT&T objects to the Company's data requests to the extent that the Company is attempting to impose on AT&T obligations with regard to identification of privileged documents beyond those required by the Tennessee Rules of Civil Procedure and applicable statutes and regulations governing contested case hearings

3. AT&T objects to the Company's data requests to the extent that they seek information relating to matters not at issue in this litigation or to the extent they are not reasonably calculated to lead to the discovery of admissible evidence. By providing information in response to these requests, AT&T does not concede that such information is relevant, material or admissible in evidence. AT&T reserves all rights to object to the use of such information as evidence.

4. AT&T objects to the Company's data requests to the extent that the Company is attempting to impose on AT&T obligations to supplement its responses beyond those required by the Tennessee Rules of Civil Procedure and applicable statutes and regulations governing contested case hearings

5. AT&T's objections and responses to these requests are based on information now known to it. AT&T reserves the right to amend, modify or supplement its objections and responses if it learns of new information.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

1. Please identify each fact witness you intend to present in this docket and, for each, please state:

a) the subject or subjects upon which the witness will testify;

b) the basis of the witness' personal knowledge of the matter regarding which witness will testify, and

c) all facts of which the witness is aware that support the witness' testimony.

RESPONSE

Witness: Mark E Argenbright, District Manager, Law and State Government Affairs.

a) The witness will address PRI service and the associated market in the state of Tennessee.

b) The witness has worked in the telecommunications industry for over 17 years with 15 of those years in the area of regulatory affairs. His background includes working with product development personnel for such issues as, reporting, tariff filings, and regulatory treatment of various telecommunications products.

c) The information requested by BellSouth in this question will be made available to all parties when AT&T files its direct and rebuttal testimony. AT&T objects to providing this information prior to that time

INTERROGATORY NO. 2

2. Please identify each expert witness you intend to present in this docket and, for each, please state:

a) the subject or subjects upon which the expert will testify;

b) the basis for your assertion that the witness is qualified as an expert including, but not limited to, a current curriculum vitae;

c) all tests, studies, measurements, experiments, or other analysis or

actions performed or observed by the expert relating to the expert's testimony;

d) all opinions that the expert will present in this docket and the basis for each opinion; and

e) all facts of which you or the expert are aware that support those opinions.

RESPONSE

See above response to Interrogatory No. 1

INTERROGATORY NO. 3

3. Please state whether you will contend in this docket that PRI service is not sufficiently competitive in Tennessee to qualify for exemption under T.C.A. § 65-5-208(b), and if you will contend such, state all bases upon which you will make such contention, and all facts which you believe support such contention.

RESPONSE

See above response to Interrogatory No 1

INTERROGATORY NO. 4

4 Please state whether you agree that competition for PRI services in Tennessee is an effective regulator of price for PRI service, and if you do not agree, please state why you do not agree and all facts that you believe support your position.

RESPONSE

See above response to Interrogatory No. 1

INTERROGATORY NO. 5

5. Please identify all ways in which you believe exempting PRI service from tariff requirements would cause harm to any end-user in Tennessee and for each way identified, please explain:

a) the basis for your belief,

b) any example of such harm being caused anywhere else in the United States;

c) how likely you believe that harm would be to occur.

RESPONSE

See above response to interrogatory No. 1.

INTERROGATORY NO. 6

6. Please identify and describe with specificity any way in which you believe that the market in Tennessee for PRI service is different than the market in other states for PRI service.

RESPONSE

The market for PRI service in Tennessee will vary from markets in other states (New York, for instance) due to state specific characteristics to include but not limited to such things as total PRI demand, population densities, and number of PRI providers.

INTERROGATORY NO .7

7. Please identify any Federal rule, order or regulation which you believe is relevant or analogous in any way to exemption of PRI services in Tennessee

RESPONSE

AT&T is unclear about the meaning of this question. Regardless of what action the TRA takes in this proceeding regarding state regulation of PRI services, no action by the TRA can

affect BellSouth's obligation to comply fully with the federal Telecommunications Act, the rules and orders of the Federal Communications Commission and other applicable federal law.

INTERROGATORY NO. 8

8. Please identify every county in Tennessee in which you have not sold PRI during the past five years.

RESPONSE

AT&T objects to this question as being overly broad and burdensome. AT&T also objects to the relevance of this question. Unless BellSouth intends to obtain similar data from all competing local exchange carriers in Tennessee, information concerning the PRI sales of a single competing carrier will be irrelevant to the determination of the extent of competition in this market. Nevertheless, in an effort to be cooperative and without waiving these objections, AT&T is in the process of collecting information about the sale of PRI lines in Tennessee and will supplement this response at a later date.

INTERROGATORY NO. 9

9. Please state the average price at which you have sold PRI in Tennessee during 2004, 2003, 2002, and 2001.

RESPONSE

See the above response to Interrogatory No 8

INTERROGATORY NO. 10

10. Please state whether you presently offer, or have offered during the past five years, in Tennessee discounts on PRI when purchased in combination with other services

RESPONSE

See the above response to Interrogatory No. 8.

INTERROGATORY NO. 11

11. Please state whether you presently offer, or have offered during the past five years, in Tennessee discounts on PRI based on volume or term commitments.

RESPONSE

See the above response to Interrogatory No. 8.

INTERROGATORY NO. 12

12. Do you offer, or are you aware of competitors who offer, whether on a standalone basis or bundled basis or promotional basis, PRI at prices below $800 per month?

RESPONSE

See the above response to Interrogatory 8 AT&T adds the additional objection that it has no unique knowledge of what prices competitors are charging for PRI services and is no better position than BellSouth to obtain that information.

INTERROGATORY NO. 13

13. Please state the number of years you have been offering PRI to customers in Tennessee.

RESPONSE

See the above response to Interrogatory No. 8.

INTERROGATORY NO. 14

14. Please identify and produce all documents to which you have referred or on which you have relied to answer the foregoing Interrogatories.

RESPONSE

None at this time

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated.

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