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August 14, 2007

VIA HAND DELIVERY

filed electronically in docket office on 08/14/07

Hon. Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

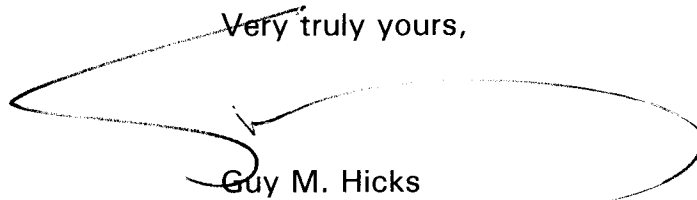
Re: *Complaint of BLC Management, LLC d/b/a Angles Communication Solutions Against BellSouth Telecommunications, Inc. to Resolve Billing Disputes, En force the Parties' Interconnection Agreement, and Prevent Interference with Service to Customers*
Docket No. 07-00053

Dear Chairman Roberson:

Enclosed are the original and four copies of *AT&T Tennessee's First Set of Interrogatories and First Requests for Production of Documents* to Angles Communication Solutions.

Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Complaint of BLC Management, LLC d/b/a Angles Communication Solutions Against BellSouth Telecommunications, Inc. to Resolve Billing Disputes, En force the Parties' Interconnection Agreement, and Prevent Interference with Service to Customers*

Docket No. 07-00053

**AT&T TENNESSEE'S FIRST SET OF INTERROGATORIES
AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee ("AT&T Tennessee"), hereby requests Angles Communication Solutions ("Angles") to provide answers and documents in response to the following discovery requests in the time established by the Procedural Schedule in this docket.

DEFINITIONS

1. "AT&T Tennessee" or "AT&T" means BellSouth Telecommunications, Inc., d/b/a AT&T Tennessee and its subsidiaries, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of AT&T Tennessee.

2. The terms "you" and "your" refer to Angles.

3. "Angles" means BLC Management, LLC d/b/a Angles Communication Solutions, and its subsidiaries, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Angles.

4. 'CGM' means CGM L.L.C. Telecom Services and its subsidiaries, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of CGM.

5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Angles, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

8. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

10. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

12. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

13. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and

- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it:
(1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

GENERAL INSTRUCTIONS

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

INTERROGATORIES

1. On or about June 7, 2006, Angles paid AT&T (then known as BellSouth) \$120,402. Identify every AT&T (then known as BellSouth) employee that was involved in the alleged determination that such payment represented the total outstanding, undisputed amount owed by Angles at time of such payment.

2. Identify all AT&T employees that Angles and/or CGM have communicated with since June 2006 regarding billing matters.

3. Identify all AT&T employees that allegedly acknowledged or admitted making any mistake regarding amounts owed by Angles (see, for example, Complaint, ¶ 7) and describe with particularity the substance of such alleged mistake.

4. Identify all AT&T employees that have allegedly concurred (or agreed) that Angles has paid or disputed all AT&T invoices since June 2006.

5. For each month starting with June 2006, identify: (i) the amounts Angles has paid AT&T; and (ii) the amounts Angles has disputed with AT&T.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1 Produce all documents relied upon in responding to AT&T Tennessee's First Set of Interrogatories.

2. Produce all documents identified in responses to AT&T Tennessee's First Set of Interrogatories.

3. Produce all documents that support Angles' contention that its payment of \$120,431.95 on or about June 7, 2006, represented payment of the total outstanding, undisputed amounts owed by Angles at the time of such payment.

4. Produce all documents that track payments made by Angles to AT&T, including, but not limited to, any spreadsheet(s) that identify open balances, current charges, disputes, and/or inaccurate/inappropriate charges.

5. Produce all documents that identify the payments made by Angles to AT&T since June 2006.

6. Produce all documents that identify the billing disputes raised by Angles since June 2006.

7. Produce all documents that support Angles' contention that AT&T has made any mistake regarding amounts owed by Angles (see, for example, Complaint, ¶ 7).

8. Produce all documents that refer to undisputed amounts owed by Angles and/or contain an acknowledgement that Angles has failed to pay AT&T (or BellSouth) undisputed amounts.

9. Produce all documents (including but not limited to email and written correspondence) exchange between Angles and AT&T (or BellSouth) regarding billing matters.

10. Produce all documents (including but not limited to email and written correspondence) exchange between CGM and AT&T (or BellSouth) regarding billing matters.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a AT&T TENNESSEE

By: 

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615/214-6301

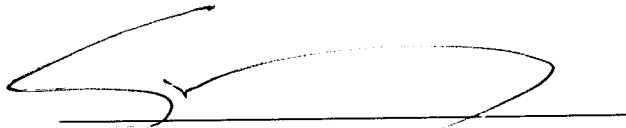
Robert Culpepper
675 W. Peachtree St., NE, Suite 4300
Atlanta, GA 30375

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2007, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
1600 Division St., Suite 400
Nashville, TN 37203
hwalker@boultcummings.com

A handwritten signature in black ink, appearing to be "H. Walker", written over a horizontal line.