

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

**AUGUST 15, 2007**

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

Docket No. 07-00053

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**BLC MANAGEMENT, LLC d/b/a/ ANGLES COMMUNICATION SOLUTIONS  
FIRST ROUND OF DISCOVERY TO  
BELLSOUTH TELECOMMUNICATIONS, INC. d/b/a AT&T TENNESSEE**

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BLC Management, LLC d/b/a Angles Communication Solutions ("Angles") hereby serves the following discovery requests to BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee (the "AT&T").

**DEFINITIONS**

1. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
2. 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 the Company, including, but not limited to, correspondence, memoranda, drafts, workpapers, 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.

3. 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.

4. "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.

5. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

6. "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.

### **GENERAL INSTRUCTIONS**

1. If you contend that any response to any data request 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;
- 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 data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

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

### **DISCOVERY REQUESTS**

1. Provide in BDT format all UNE bills sent by AT&T to Angles from the beginning of UNE billing through and including April 6, 2006.

### **RESPONSE:**

2. To the extent not covered by the response to Question 1, provide in BDT format records of all payments by Angles to AT&T through July, 2007, showing the accounts to which each payment was allocated and how much was allocated to each account. In every instance in which Angles did not specify how to allocate the payments among Angles' accounts, explain the reasoning for AT&T's allocation decisions.

**RESPONSE:**

3. If not covered in response to Question 2, explain how the payment of \$120,402.61 by Angles on June 7, 2006, was allocated among Angles' accounts and explain the reasoning behind AT&T's allocation decision.

**RESPONSE:**

4. If not covered in response to Question 2, explain how the payment of \$75,000.00 by Angles on December 28, 2006, was allocated among Angles' accounts and explain the reasoning behind AT&T's allocation decision.

**RESPONSE:**



5. Provide the job titles and job descriptions of Gary Patterson and Leisa Mangina in June, 2006, and, if different, in August, 2007.

**RESPONSE:**

6. Explain AT&T's understanding of the email sent by Leisa Mangina to Charles Campbell on June 7, 2006, in which she requested payment by Angles of \$120,402.61 and explain how she arrived at that amount and what the amount represented.

**RESPONSE:**

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

Henry M. Walker (No. 000272)

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P.O. Box 340025

Nashville, Tennessee 37203

(615) 252-2363

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing is being forwarded via U.S. mail, to:

Guy Hicks  
AT&T of Tennessee  
333 Commerce Street  
Nashville, TN 37201

on this the 15<sup>th</sup> day of August, 2007.

  
Henry Walker