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VIA HAND DELIVERY

Hon. Shilina Chatterjee, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

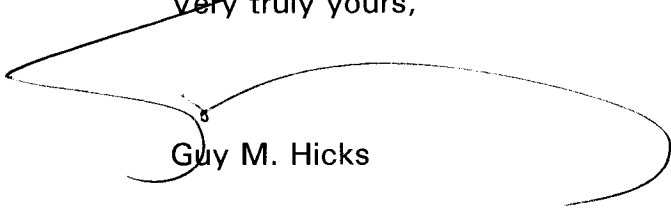
Re: *Complaint of BLC Management, LLC d/b/a Angles Communication Solutions Against BellSouth Telecommunications, Inc. to Resolve Billing Disputes, En force the Parties' Interconnection Agreement, and Prevent Interference with Service to Customers*
Docket No. 07-00053

Dear Hearing Officer Chatterjee:

Enclosed please find AT&T Tennessee's *Objections to the First Set of Data Requests Propounded by Angles Communications Solutions*. Notwithstanding the two specific objections made by AT&T, AT&T does intend to provide information responsive to each of Angles' data requests.

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 OBJECTIONS TO ANGLES
COMMUNICATION SOLUTIONS' FIRST SET OF DATA REQUESTS**

Pursuant to the procedural order issued in this Docket, BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee hereby files its objections to the First Set of Data Requests filed by BLC Management, LLC d/b/a Angles Communication Solutions ("Angles") on August 15, 2007.

GENERAL OBJECTIONS

1. AT&T Tennessee objects to each data request to the extent that it seeks to impose an obligation on AT&T Tennessee to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such data request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

2. AT&T Tennessee objects to each data request to the extent that it is intended to apply to matters other than intrastate operations subject to the

jurisdiction of the Tennessee Regulatory Authority (“Authority” or “TRA”). AT&T Tennessee objects to each such data request as being irrelevant, overly broad, unduly burdensome, and oppressive. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

3. AT&T Tennessee objects to each data request to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

4. AT&T Tennessee objects to each data request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this discovery. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T Tennessee objects to each data request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. AT&T Tennessee will attempt to note in its responses each instance where this objection applies. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

6. AT&T Tennessee objects to providing information to the extent that such information is publicly available. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

7. AT&T Tennessee objects to each data request to the extent that it seeks to impose obligations on AT&T Tennessee that exceed the requirements of the TRA, Tennessee Rules of Civil Procedure, and/or Tennessee Law. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

8. AT&T Tennessee objects to each data request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

9. AT&T Tennessee objects to each data request to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

10. AT&T Tennessee is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, AT&T Tennessee creates countless documents that are not subject to

TRA or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. AT&T Tennessee will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the data requests purport to require more, AT&T Tennessee objects on the grounds that compliance would impose an undue burden or expense. Any answers provided by AT&T Tennessee in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

In addition to the foregoing general objections applicable to all of Angles' Data Requests, AT&T Tennessee submits the following specific objections.

SPECIFIC OBJECTIONS

REQUEST #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.

OBJECTION: AT&T Tennessee objects to this data request on the grounds it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. Specifically, the information sought concerns UNE billings while the primary (if not exclusive) issue in this docket involves billings for services resold by Angles. Additionally, this data request is vague as the term "BDT format" is not defined. Further, the data request is unduly burdensome and overly broad as it requests "all UNE bills sent by AT&T to Angles from the beginning of UNE billing through and including April 6,

2006.” Moreover, the data request is unduly burdensome in that it requests AT&T Tennessee to produce copies of bills – *bills that Angles has already received in the normal course of business* – in an undefined format.

In any event, AT&T Tennessee has already provided Angles with copies of its bills in an attempt to resolve this matter without further litigation. Notwithstanding the foregoing objections, and in the spirit of cooperation, AT&T Tennessee is prepared to provide, yet again, such documentation to Angles as a full and complete response to this data request.

REQUEST #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.

OBJECTION: AT&T Tennessee objects to this data request on the grounds that it is unduly vague as the term “BDT format” is not defined. Further, the data request is unduly burdensome and overly broad as it requests “records of all payments made by Angles to AT&T through July, 2007.” Moreover, the data request is unduly burdensome in that it requests AT&T Tennessee to produce information and/or documentation in an undefined format.

Notwithstanding the foregoing objections, and in the spirit of cooperation, AT&T Tennessee will provide documentation and/or information as a full and complete response to this data request.

For the foregoing reasons, AT&T Tennessee objects to Angles' First Set of Data Requests.

Respectfully submitted,

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

By: 

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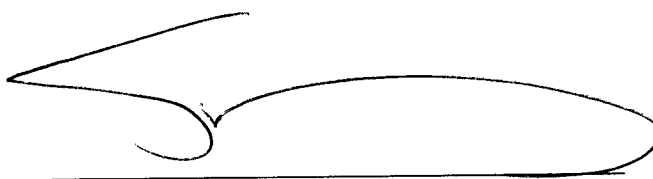
Robert A. Culpepper
675 W. Peachtree St., NE
Suite 4300
Atlanta, GA 30375

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 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.
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A handwritten signature in black ink, appearing to be 'H. Walker', written over a horizontal line.