



BOULT ■ CUMMINGS®
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August 21, 2007

Shilina Chatterjee, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Pkwy.
Nashville, TN 37243-0505

filed electronically in docket office on 08/21/07


***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: 07-00053***

Dear Ms. Chatterjee:

For the reasons set forth in the attached document, Angles objects to Document Requests 4, 5, 6, 9, and 10 filed by AT&T.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/djc
Enclosure
cc: Guy Hicks

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

August 21, 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

**BLC MANAGEMENT, LLC d/b/a ANGLES COMMUNICATION SOLUTIONS'
OBJECTIONS TO AT&T'S
FIRST SET OF DISCOVERY REQUESTS**

Pursuant to the August 21, 2007 Order Establishing Procedural Schedule, BLC Management, LLC d/b/a Angles Communication Solutions (Angles), by and through its attorneys, submits the following objections to the First Set of Discovery Requests from AT&T f/d/b/a BellSouth Telecommunications, Inc. ("AT&T") propounded upon Angles.

OBJECTIONS TO SPECIFIC DISCOVERY REQUESTS

4. Product 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.

RESPONSE: Angles objects to this question on the grounds that it is overly broad and therefore burdensome. CGM keeps voluminous documents concerning Angles payments to AT&T. If AT&T could limit the time period or, in the alternative, describe with more particularity the requested documents (such as providing the column headings on the Excel spreadsheet used by CGM and AT&T to monitor payments) this objection could be resolved.

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

RESPONSE: Angles objects on the grounds that this Request appears to duplicate Request 4 and Interrogatory 5.

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

REPONSE: Angles objects on the grounds that this Request appears to duplicate Request 4 and Interrogatory 5. Furthermore, Angles believes that this Request is irrelevant because the total amount of billing disputes raised by Angles since June 2006 is not at issue in this case.

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

RESPONSE: Angles objects to this question on the grounds that it is overly broad, and therefore, burdensome.

The question asks for "all" documents exchanged between Angles and AT&T "regarding billing matters." Angles has been in existence since early 2004. There are probably hundreds, if not thousands, of emails between the parties concerning billing matters. All, of course, are presumably available to AT&T as either the sender or recipient of the emails. Is there a period of time that would narrow the request? Are there specific issues which would narrow the request? As stated, the question is too broad to be reasonable.

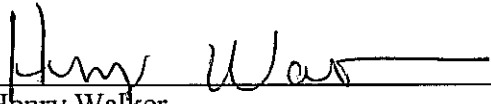
10. Produce all documents, including but not limited to email and written correspondence) exchanged between CGM and AT&T (or BellSouth) regarding billing matters.

RESPONSE. See response to Request 9 above. As the firm responsible for handling Angles' billing matters since early 2006, CGM continually exchanges emails about "billing matters" with AT&T. Moreover, CGM also deals with billing matters on behalf of a number of other clients. A literal response to this question would require CGM to go through thousands of emails to identify all those dealing with Angles. As in Request 9, this data request contains no limits as to time or subject matter. As written it is too broad to be reasonable. And, of course, AT&T already has copies of all the requested information.

Finally, it should be noted that the bulk of communication between CGM and AT&T concern matters not at issue in this docket. AT&T claims it is trying to collect only "undisputed" charges. Among other things, CGM files disputes on behalf of Angles and also files claims for promotional credits that, thus far, BellSouth has largely refused to pay. All of these constitute "disputed charges" which are not at issue in this docket. Moreover, there is no dispute (to CGM's knowledge) concerning the total amount of these disputed charges. The correspondence between CGM and Angles concerning these billing disputes is not relevant to the determination of what, if any, "undisputed" charges Angles owes to AT&T.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

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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 21st day of August, 2007.



Henry Walker