## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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)	Docket No.: 07-00201
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# FIRST DISCOVERY REQUEST OF JACKSON ENERGY AUTHORITY TO AENEAS COMMUNICATIONS, LLC AND TENNESSEE CABLE TELECOMMUNICATIONS ASSOCIATION

TO: Aeneas Communications, LLC c/o Henry M. Walker, Esq.
Boult, Cummings, Conners & Berry, PLC 1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203

Tennessee Cable Telecommunications
Association
c/o Charles B. Welch, Jr., Esq. and
Jamie R. Hollin, Esq.
Farris Mathews Branan Bobango
Hellen & Dunlap, PLC
Historic Castner-Knott Building
618 Church Street, Suite 300
Nashville, Tennessee 37219

- 1. Identify each person whom you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:
  - (a) State the field in which the witness is to be offered as an expert;
  - (b) State the subject matter on which the witness is expected to testify;
  - (c) State the substance of the facts and opinions to which the witness is expected to testify and a summary of the grounds for each opinion;
  - (d) Identify and produce copies of each and every publication, presentation, testimony or other document prepared, written or otherwise developed, in whole or in part by such witness relating to the subject matter on which the witness is expected to testify; and

(e) Identify and produce copies of all documents reviewed by, utilized by, relied upon, created by or produced by the witness in evaluating, reaching conclusions or formulating one or more opinions in this matter.

#### **RESPONSE:**

2. If you contest any of the assertions contained in the Petition in this matter, or any of the relief requested therein, please identify and explain your contentions and the factual and/or legal bases for each such contention, and please provide copies of all documents relating to each such contention.

#### **RESPONSE:**

3. The Petitioner has asserted in its Application that it is qualified from a managerial, technical and financial standpoint to provide the services described in its Petition. Do you dispute all or any part of this assertion? If so, please explain your contentions in detail and provide copies of all documents related to each of your contentions.

#### **RESPONSE:**

4. Produce copies of all hearing exhibits that you plan to introduce, use or reference at the hearing on the merits in this docket.

#### **RESPONSE:**

Respectfully submitted,

Melvin J. Malone Mark W. Smith

MILLER & MARTIN PLLC

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Nashville, Tennessee 37219-2433

(615) 244-9270 telephone

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Attorneys for Jackson Energy Authority

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy has been forwarded via email and U.S. Mail to the following on this the 10th day of December 2007.

Charles B. Welch, Jr., Esq.
Jamie R. Hollin, Esq.
Farris Mathews Branan Bobango
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For Miller & Martin PLLC