

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

)
IN RE: CITIZENS TELECOMMUNICATIONS)
COMPANY OF TENNESSEE, LLC D/B/A)
FRONTIER COMMUNICATIONS OF) DOCKET NO. 08-00021
TENNESSEE, LLC TO ESTABLISH)
DIRECTORY ASSISTANCE RATES)
)

CONSUMER ADVOCATE’S FIRST SET OF DISCOVERY REQUESTS

Robert E. Cooper, Jr., the Attorney General & Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter “Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118 and the Tennessee Rules of Civil Procedure, respectfully submits these discovery requests to Citizens Telecommunications Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee, LLC (“Citizens” or “Company”).

This Discovery Request is hereby served upon Citizens, pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Stephen R. Butler.

PRELIMINARY MATTERS AND DEFINITIONS

Each discovery request calls for all knowledge, information and material available to Company, as a party, whether it be Company’s, in particular, or knowledge, information or

material possessed or available to Company's attorney or other representative.

These discovery requests are to be considered continuing in nature, and are to be supplemented from time to time as information is received by Company which would make a prior response inaccurate, incomplete, or incorrect. In addition, the Attorney General requests that Company supplement responses hereto with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert at hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. The singular of any discovery request includes the plural and the plural includes the singular. To assist you in providing full and complete discovery, the Attorney General provides the following definitional guidelines.

The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

For purposes of these discovery requests, the term "you" shall mean and include: Citizens Telecommunications Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee, LLC, and all employees, agents and representatives thereof.

The term "person" or "persons" as used herein refers to any natural person, corporation,

firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served, all responses must include the company's response. Moreover, the company's designated person for responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.*

The term "identity" and "identify" as used herein, with respect to any person, means to provide their name, date of birth, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the nature of the document, the title of the document, the reference number (if any) of the document, and the current location of the document, including the identity of the person or entity in possession of the document.

The term "document" as used herein, means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, workpaper, spreadsheet, note, photograph, tape recording, computer disk or record, or other data compilation in any form without limitation. Produce the original and each copy, regardless of origin or location, of any book, pamphlet, periodical, letter, note, report, memorandum (including memoranda, note or report of a meeting or conversation), spreadsheet, photograph, videotape, audio tape, computer disk, e-mail, or any

other written, typed, reported, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody, or control. If any such document was, but no longer is, in your possession or control, state what disposition was made of it and when. If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy), each version shall be treated as a different document and each must be identified and produced.

If you produce documents in response to these discovery requests, produce the original of each document or, in the alternative, produce a copy of each document and identify the location of the original document. If the “original” document is itself a copy, that copy should be produced as the original.

If any objections are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege asserted.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any of the interrogatories are not answered on the basis of privilege or immunity, include in your response to each such interrogatory a written statement evidencing:

- (a) the nature of the communication;
- (b) the date of the communication;
- (c) the identity of the persons present at such communication; and
- (d) a brief description of the communication sufficient to allow the Authority to rule on a motion to compel.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If any information requested is not furnished as requested, state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

1. Please identify each person whom you expect to call as an expert witness at the hearing on the merits in this docket, and state the subject matter on which each expert witness is expected to testify.

RESPONSE:

2. For each person whom you expect to call as an expert witness, explain all qualifications that the person has to form opinions regarding the subject matter on which the person is expected to testify.

RESPONSE:

3. For each person whom you expect to call as an expert witness, state the substance of the facts and opinions to which the expert is expected to testify.

RESPONSE:

4. For each person whom you expect to call as an expert witness, state a summary of the grounds for each opinion.

RESPONSE:

5. Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, utilized by, relied upon, created by, or produced by any witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

6. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE:

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

RESPONSE:

8. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications,

reports, records, statements, Internet web pages, or financial information -- that you contend support the factual assertions, conclusions, or opinions of any of your witnesses in this matter.

RESPONSE:

9. Please identify all information, documents and things filed in the present docket record, including all responses to discovery of the parties and data request from the TRA Staff, which Citizens produced in this docket and does not agree to stipulate to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, documents and things which Citizens produced in this docket and which Citizens contends is not admissible as evidence, describe in specific detail any objection(s) Citizens claims as to admissibility into the evidentiary record in this docket.

RESPONSE:

10. Please provide all Excel (or other data files) containing the information provided in response to these requested items.

RESPONSE:

11. Please provide the identity and location of each person having knowledge of any discoverable matter in this docket.

RESPONSE:

12. Define local directory assistance area as the term is applied in the Company's tariffs, and provide a description of the Company's local directory assistance areas throughout Tennessee.

RESPONSE:

13. If an affiliate or non-affiliate provides wire line directory assistance for either local or national directory assistance to the Company's Tennessee consumers on behalf of Citizens, identify the affiliate or non-affiliate and provide a copy of the contract and/or agreement.

RESPONSE:

14. Provide the annual projections for 2008 and 2009 for the increase in revenue resulting from a decrease in the free directory assistance call allowance from unlimited to one. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

15. Provide annual projections for 2008 and 2009 for the increase in revenue resulting from a decrease in the free directory assistance call allowance from unlimited to two. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

16. Provide a projection for the annual increase in revenue in 2008 and 2009 resulting from an

increase in the free directory assistance call allowance from unlimited to three. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

17. Provide a projection for the annual increase in revenue in 2008 and 2009 resulting from an increase in the free directory assistance call allowance from unlimited to four. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

18. Provide a projection for the annual increase in revenue in 2008 and 2009 resulting from an increase in the free directory assistance call allowance from unlimited to five. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

19. Provide a projection for the annual increase in revenue in 2008 and 2009 resulting from an increase in the free directory assistance call allowance from unlimited to six. Explain how Citizens determined its projections, including the method employed in the calculation, and provide copies of any documents utilized in the calculations.

RESPONSE:

20. Provide or describe the publication and distribution schedule for updating and replacing phone books distributed to the Company's customers.

RESPONSE:

21. Provide a copy or copies of the most recently distributed white pages phone book(s) distributed on behalf of Citizens to all customers within the Company's service area in Tennessee.

RESPONSE:

22. Provide the number of existing or new Citizens residential and business customers that obtained a new or different telephone number(s) in Tennessee in the calendar year 2007 by month and by specific published directory.

RESPONSE:

23. Provide a listing of the total number of changes, including edits, additions, and deletions of telephone numbers and listing information, that were made on behalf of the Company to update the most recently distributed published telephone directory for the entire Citizens service area by month and specific directory.

RESPONSE:

24. Provide the total number of telephone number listings in the Company's Tennessee service area white pages telephone book(s) distributed at the end of the year 2006 and/or the beginning of the year 2007.

RESPONSE:

25. Provide the total number of telephone number listings in the Company's Tennessee service area white pages telephone book(s) distributed at the end of the year 2007 and/or the beginning of the year 2008.

RESPONSE:

26. Provide the average time lag or time period between the date information is provided to the directory publisher and the date the telephone directories are distributed to the Company's Tennessee customers, and explain how the average was calculated.

RESPONSE:

27. Please identify all alternatives known to and/or documented by the Company that are available to the Company's residential customers for access to free directory assistance service within the Company's Tennessee service area.

RESPONSE:

28. Please state the average number of directory assistance calls per month for residential customers of Citizens in Tennessee during the calendar year 2007, and explain or describe the method of calculation and all fact and figures employed to respond.

RESPONSE:

29. Does the Company provide free local and/or national directory assistance or discounted local and/or national directory assistance to any of its business and/or commercial customers? If so, provide details.

RESPONSE:

30. Does the Company provide free local and/or national directory assistance in bundled offerings as the term “bundle” is applied in Tenn.Code Ann. § 65-37-103? If so, provide details.

RESPONSE:

31. Describe and explain the application and approval process and the documentation required by the Company for disabled consumers or others to obtain an exemption from the Company’s directory assistance charges.

RESPONSE:

32. Provide descriptions of and copies of all bill inserts, promotions, public notices and advertisements that the Company plans to sponsor, publish or distribute to its customers regarding the exemption from directory assistance charges for disabled customers and any other customers determined by the TRA to be exempt from such charges.

RESPONSE:

33. Provide copies of all documents from the past five years that indicate the cost to Citizens of providing directory assistance.

RESPONSE:

34. Provide copies of the Company's latest annual price cap filing.

RESPONSE:

35. Provide copies of all documents in possession of the Company that document or indicate the scope, estimate and/or factual documentation of Internet access and/or service penetration rate within the Company's Tennessee service area.

RESPONSE:

36. Would the Company object to exempting customers who are age 65 or over from directory assistance charges? If so, please explain why.

RESPONSE:

37. Would the Company object to exempting customers who are involved in the Life-line and/or Link-up programs from directory assistance charges? If so, please explain why.

RESPONSE:

38. Please state and explain the estimated annual cost to the Company of exempting customers who are age 65 or over from directory assistance charges, and provide copies of any documents relevant to the calculation.

RESPONSE:

39. Please state and explain the estimated annual cost to the Company of exempting customers who are involved in the Lifeline program from directory assistance charges, and provide copies of any documents relevant to the calculation.

RESPONSE:

40. Please state and explain the estimated annual cost to the Company of exempting customers who are disabled or handicapped from directory assistance charges, and provide copies of any documents relevant to the calculation.

RESPONSE:

RESPECTFULLY SUBMITTED,



STEPHEN R. BUTLER, B.P.R. # 014772
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8722 (phone)
(615) 532-2910 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Complaint and Petition to Intervene was served on the parties of record via facsimile, U.S. Mail, hand delivery, commercial delivery, or e-mail, on the 2nd day of May, 2008.

A handwritten signature in cursive script, reading "Steve Butler", written over a horizontal line.

Stephen R. Butler
Assistant Attorney General