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May 2, 2008

Honorable Eddie Roberson, Chairman
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

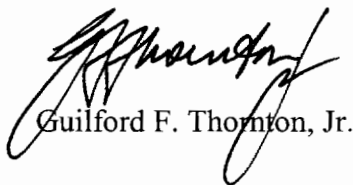
Re: Citizens Telecommunications Company of Tennessee LLS d/b/a Frontier
Communications of Tennessee, LLC Tariff to Establish Directory
Assistance Rates
File #: 08-00021

Dear Chairman Roberson,

On behalf of Frontier Communications of America, Inc. ("Frontier"), I am enclosing with this letter an original and thirteen copies of Frontier's first set of interrogatories and requests for production of documents to the Consumer Advocate and Protection Division. Copies are being distributed to counsel for the parties of record.

Should have any questions or require anything further at this time please do not hesitate to contact me.

Sincerely,



Guilford F. Thornton, Jr.

cc: Gregg Sayre

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

IN RE:)	
)	
CITIZENS TELECOMMUNICATIONS)	No. 08-00021
COMPANY OF TENNESSEE LLC d/b/a)	
FRONTIER COMMUNICATIONS OF TENNESSEE, LLC)	
TARIFF TO ESTABLISH DIRECTORY ASSISTANCE)	
RATES.)	

**CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE LLC D/B/A
FRONTIER COMMUNICATIONS OF TENNESSEE LLC'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE CONSUMER ADVOCATE AND PROTECTION DIVISION**

Pursuant to Authority Rule 1220-1-2-.11, the Tennessee Rules of Civil Procedure, and the Hearing Officer's Order Setting Procedural Schedule entered on April 10, 2008, Citizens Telecommunications Company of Tennessee LLC d/b/a Frontier Communications of Tennessee LLC ("Frontier") submits these discovery requests to the Consumer Advocate and Protection Division, Office of the Attorney General ("Consumer Advocate" or "CAD"). Frontier requests that the Consumer Advocate provide its answers to these discovery requests to Frontier's counsel, Guilford F. Thornton, Jr. and Charles W. Cook, III at Adams and Reese LLP, 424 Church Street, Suite 2800, Nashville, Tennessee 37219 or such other place as the parties agree.

(a) If any response required by way of answer to these requests is considered to contain confidential or protected information, please furnish the requested information when a protective order has been entered in this docket and the appropriate non-disclosure agreements have been executed by the parties.

(b) If any response required by way of answer to these requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.

(c) If any request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a request,

answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(d) These requests require supplemental responses consistent with the provisions of the Tennessee Rules of Civil Procedure.

DEFINITIONS

"You," "your" or "Consumer Advocate" refers to the Consumer Advocate and Protection Division, Office of the Attorney General, and the employees, agents, representatives, members or consultants of the Consumer Advocate and Protection Division, Office of the Attorney General.

"Representative(s)" means those persons, past and present not in the direct employment of the Consumer Advocate including outside counsel, who represent or represented the interests of Consumer Advocate in matters related to this proceeding.

"Employee(s)" means those persons in the direct employment of Consumer Advocate, past and/or present.

"Person" and "persons" include individuals, firms, partnerships, associations, trade associations, corporations, government entities, or other groups, however organized.

"Document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, e-mail, facsimile ("fax"), cable, report, recording, contract, agreement, study, handwritten note, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape, disk, file stored on computer, or any other written, recorded, transcribed, punched tape, filmed or graphic

matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

"Identification" or "identify" when used in reference to: (i) a document other than a contract or agreement means to state: (1) its date; (2) its author; (3) the type of document; (4) its title; (5) its present location; (6) the name of each of its present custodians; (ii) a contract or agreement, means: (1) state the date of its making; (2) identify the parties thereto; (3) state whether the contract is oral or in writing; (4) state fully and precisely and separately all of the terms of said contract; (iii) a person other than an individual, means to state: (1) its full name; (2) its nature of organization, including the name of the state or country under the laws of which it was organized; (3) the address of its principal place of business; and (4) its principal line of business; (iv) a communication, requires you, if any part of the communications was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

"Possession, custody or control" includes actual constructive possession. Any document which is not in your immediate physical possession, but to which you have or had a right to compel or secure production from a third person or which is otherwise subject to your control, shall be obtained and produced as directed.

"Relate to" means concern, consist of, refer to, pertain to, reflect, evidence, or to be in any way logically or factually connected with the matter discussed.

"And" and "or" 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 interrogatories anything that would not otherwise be brought within their scope.

"Concerning" shall mean comprising, describing, evidencing, referring to, responding to, quoting, or pertaining in any way to any part of a specified subject matter and/or to the contents or subject matter of any document including the specified subject matter.

"Communication" includes, without limitation of its generality, correspondence, statements, agreements, contracts, discussions, conversation, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as e-mail, intercoms, telephones, television or radio, data systems, and electronic reproductions and delivery systems.

INSTRUCTIONS

These Interrogatories and Requests for Production of Documents are to be answered with reference to all information in your possession, custody or control or reasonably available to you. When the information requested by an Interrogatory varies over time, state the response for each period of time as to which the response differs, and identify the time periods. If you cannot answer an Interrogatory in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of any Interrogatory, you should so state in your response, describing in full your effort to obtain the information requested, and then proceed to respond to the fullest extent possible. If you object to any part of

any Interrogatory, answer all parts of the Interrogatory to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

These Interrogatories and Requests for Production of Documents are continuing in nature. Thus, in the event that you obtain additional information with respect to any Interrogatory and Request for Production of Documents after it has been answered, you are required to supplement your response promptly following receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state giving the legal basis for your refusal.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description); and
- b. The earliest dates, time period, and location that representatives of Frontier may inspect your files, records or documents in which the information currently exists.

For each Interrogatory and Request for Production of Documents answered, provide the name, business address(es) and telephone number(s) of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response. If you do not intend to call or present a witness who is prepared to testify concerning the matters contained in any response, please so state.

**INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Identify all documents, electronically stored information, and tangible things that the Consumer Advocate has in its possession, custody or control and may use to support its opposition to the Tariff filed by Frontier that is the subject of this proceeding (the "Tariff").¹

RESPONSE:

2. State the factual basis underlying the reasons why the Consumer Advocate did not intervene and/or object to the tariff filing in Tennessee Regulatory Authority ("Authority") Docket No. 06-00232 that allowed BellSouth to lower its local directory assistance ("DA") monthly allowances from three to one?

RESPONSE:

¹ This interrogatory is taken from Fed. R. Civ. P. 26(a)(1)(A)(ii). Therefore, it should not be subject any objections.

3. Identify all communications and any documents evidencing any communications between the Consumer Advocate and BellSouth Telecommunications, Inc. concerning Docket No. 06-00232 or the local DA allowances reduction included in the docket prior to the Authority's final decision in that docket?

RESPONSE:

4. The Authority's April 17, 2007 Order in Docket No. 06-00232 at pages 5-6 includes the rationale set forth below that supports BellSouth's reduction of its local DA monthly allowances from three to one. Explain in full (a) whether the Consumer Advocate takes exception to any part of this rationale as applied to BellSouth Telecommunications, Inc. (now AT&T Tennessee) and if so, (b) all facts upon which the Consumer Advocate relies to support its reason for taking exception to such rationale.

"Initially, the TRA approved a six DA call allowance in 1997 due to the fact that many telephone numbers were not published in the printed directory. Some numbers had been excluded in the printed directory at a subscriber's request (i.e., a non-published listing), and some were inaccurate or did not appear because new numbers were obtained after the directory was printed (e.g., a new customer or customer move). Accordingly, it was necessary that customers call DA in order to obtain telephone numbers for those subscribers whose numbers did not appear in the printed directory but were still available via directory assistance."

"While some telephone numbers are not available in the printed directory today, the evolving dynamics of the communications environment enables many, if not most, consumers to obtain subscribers' telephone numbers, not available in the printed directory, by alternative modes. For example, many telephone numbers are available through various internet search engines. Additionally, ever expanding bases of consumers have cellular telephones and electronic mail addresses (e-mail) by which they can be contacted in the

event of a change to their landline telephone number. These expanding avenues of communication facilitate the acquisition of landline telephone numbers, and reduce dependency on DA for the procurement of telephone numbers that are not in the printed directory."

"Further, the majority of BellSouth's competitors have no restrictions on the DA services they offer, including the number of call allowances. In fact, most competing local exchange company's ("CLECs") do not have call allowances and charge for every DA request. BellSouth's consumers are permitted one free DA call per month. Given the variety of existing methods from which to acquire telephone numbers in today's environment, the Authority finds the tariff reasonable and not adverse to the public interest. BellSouth will continue to provide its DA service at no charge to physically and visually disabled customers, and to customers sixty-five years or older who request an exemption."

RESPONSE:

5. Does the tariff of Charter Communications presently on file with the Authority, include monthly allowances for local DA (not including exemptions for disabilities)?

RESPONSE:

7. Are you aware of any other providers of telecommunication services within the State of Tennessee that charge for directory assistance calls? If so, identify all such entities, and for each entity identified, state the allotment of free calls (if any) offered by that entity; the charge for directory assistance calls; any exemptions allowed (e.g. over 65 or disabled); and the time period(s) during which such terms were in effect.

RESPONSE:

8. Are you aware of means by which persons in Tennessee can obtain directory assistance information other than from a telephone book or directory assistance within the last three years to the present? If so, identify each such means and the cost for such information.

RESPONSE:

9. To the extent that you contend that it is relevant, please provide any studies the Consumer Advocate has performed or has in its possession that show the churn rate of telecommunication carriers in Tennessee.

RESPONSE:

10. The Consumer Advocate stated on page 9 of its brief filed January 31, 2008 in Docket No. 07-0239:

"Embarq, AT&T and Citizens Telecom — Tennessee are very different companies in terms of service area and number of customers. In this regard, they are far from similarly situated. In setting D.A. public policy, the agency may take into consideration the vast differences between the companies in coming to a decision that services the public interest."

Please (a) explain all facts that support the Consumer Advocate's contention cited above and (b) also articulate the nexus between those differences and a policy of establishing different standards for local DA calling allowances among these incumbent carriers.

RESPONSE:

11. Provide all facts that the Consumer Advocate contends justifies the reason why (with the exception of exemptions for disability or age) AT&T should be allowed to charge for all but one directory assistance call per month and Frontier should not be allowed to charge for all but two directory assistance calls.

RESPONSE:

12. Please identify all facts that show how the public interest is advanced by enforcing different standards for local DA calling allowances between incumbents and competitive local exchange carriers that serve similarly situated customers in the same geographic areas.

RESPONSE:

13. The Consumer Advocate has stated there should be a relationship between the rate for local DA and the number of DA allowances required. If in fact a higher charge makes the number of allowances that much more important, then please explain in full why AT&T is allowed to offer only one allowance and charge \$1.35 per inquiry while Frontier's proposed rate for local DA is \$.95 per inquiry and the Consumer Advocate is attempting to disallow Frontier from limiting its allowance to two calls per billing cycle.

RESPONSE:

14. Do you contend that any customer of Frontier over the age of 65 should be entitled to unlimited free directory assistance calls regardless of financial circumstances or mental or physical condition? If so, state all facts that support your contention?

RESPONSE:

15. Do you contend that it is unreasonable for Frontier to offer unlimited free directory assistance calls to persons who are certified as handicapped as proposed in the Tariff? If so, please state all facts that support your contention.

RESPONSE:

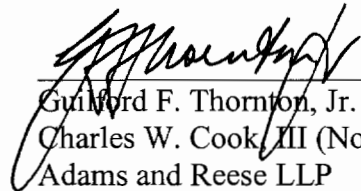
16. Please provide any and all documents in the Consumer Advocate's possession or identify such documents the Consumer Advocate has knowledge of concerning DA call allowances for other incumbent local exchange carriers and competitive local exchange carriers operating in Tennessee.

RESPONSE:

17. Produce all documents that are otherwise identified in response to any interrogatory herein or otherwise evidence or support any response made to any interrogatory contained herein.

RESPONSE:

Respectfully submitted this 2nd day of May, 2008.



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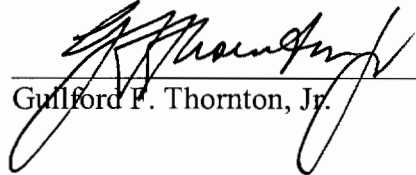
Attorneys for Citizens Telecommunications
of Tennessee LLC d/b/a Frontier
Communications of Tennessee

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing to the Consumer Advocate and Protection Division by depositing a copy in the U.S. Mail to:

Robert E. Cooper, Jr.
Tennessee Attorney General & Reporter
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202

Steve Butler and
Ryan L. McGehee
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202



Guilford F. Thornton, Jr.