

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

IN RE:

**BELLSOUTH TELECOMMUNICATIONS,
INC. DBA AT&T TENNESSEE PETITION
TO EXTEND MARKET REGULATION
TO RATE GROUPS 1 AND 2**

DOCKET NO. 10-00108

DISCOVERY REQUEST OF THE CONSUMER ADVOCATE TO AT&T

**To: AT&T
c/o Guy M. Hicks, Esq.
Joelle Phillips, Esq.
Attorneys for AT&T Tennessee
333 Commerce Street, Suite 2101
Nashville, TN 37201**

This Discovery Request is hereby served upon BellSouth Communications, Inc. dba AT&T Tennessee ("AT&T," or "Company"), 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 Mary Leigh White on or before July 8, 2010.

PRELIMINARY MATTERS AND DEFINITIONS

Each discovery request calls for all knowledge, information and material available to Company, as a party, whether it be the 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 AT&T which would make a prior

response inaccurate, incomplete, or incorrect. In addition, the Consumer Advocate and Protection Division of the Tennessee Attorney General ("Attorney General" or "Consumer Advocate") requests that AT&T 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: AT&T 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, e-mail, 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.

DISCOVERY REQUESTS

REQUEST NO. 1:

Please provide all service quality reports from June 1, 2006 through June 1, 2010 in regard to AT&T rate groups that are currently operating under market regulation as defined by T.C.A. § 65-5-109.

RESPONSE:

REQUEST NO. 2:

For those AT&T customers in rate groups currently operating under market regulation, please state the number of complaints, by year, and provide copies of any complaints received for the two (2) years before AT&T elected market regulation and for the period since the date AT&T elected to operate under market regulation.

RESPONSE:

REQUEST NO. 3:

State whether it is AT&T's intention to raise rates for rate groups 1 and 2 should the TRA grant AT&T's Petition in this docket. In your response, please identify the following in regard to any intended rate increases:

- (a) The dollar amount of any intended rate increases; and
- (b) The effective dates of any intended rate increases.

RESPONSE:

REQUEST NO. 4

Identify any rate increases occurring in the two (2) years before AT&T elected market regulation and in the period since AT&T elected market regulation for those rate groups currently operating under market regulation as defined by T.C.A. § 65-5-109. In your response, please identify the following in regard any rate increases:

- (a) The dollar amount of such rate increases;
- (b) The rate groups affected by the increased rates; and
- (c) The effective dates of such rate increases.

RESPONSE:**REQUEST NO. 5**

Please provide the number and a description of the cause of any billing errors, by year, in the two (2) years before AT&T elected market regulation and in the period since electing market regulation. If the errors were resolved, please describe the resolution.

RESPONSE:**REQUEST NO. 6**

Please provide any Service Quality Management (SQM) Performance Data as required by Section 2.6 of AT&T's Self-Effectuating Enforcement Mechanism (SEEM) Plan in regard to all rate groups from June 1, 2006 through June 1, 2010.

RESPONSE:


REQUEST NO. 7:

For those AT&T customers in rate groups currently operating under market regulation, please provide the number of AT&T customers who received a Lifeline subsidy in the two (2) years before AT&T elected market regulation and in the period since electing market regulation.

RESPONSE:

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER, JR., BPR# 010934
Attorney General and Reporter


MARY LEIGH WHITE, BPR# 026659
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Telephone: (615) 741-4657
Fax: (615) 741-1026

Dated: June 28th, 2010.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Guy M. Hicks
Joelle Phillips
Attorneys for AT&T Tennessee
333 Commerce Street, Suite 2101
Nashville, TN 37201

This the 28th day of June, 2010.



Mary Leigh White