

IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE

IN RE: )  
 )  
AT&T Tennessee Complaint Against ) DOCKET NO. 19-00099  
Cellular South, Inc. d/b/a C Spire )

**DISCOVERY REQUESTS OF**  
**CELLULAR SOUTH, INC., d/b/a C SPIRE**

Cellular South, Inc., d/b/a C Spire (“C Spire”) submits the following discovery requests to BellSouth Telecommunications, LLC d/b/a AT&T Tennessee (“AT&T”).

**DEFINITIONS**

A. “AT&T” or “BellSouth” refers to AT&T Tennessee, as well as its agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

B. “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive. The singular shall include the plural, and vice-versa, where appropriate.

C. “Communication” means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means including, but not limited to, telephone conversations, letters, memoranda, electronic correspondence, meetings and personal conversations.

D. “Document” means, in the broadest sense possible, any medium upon which information has been recorded or retrieved, whether in draft or final form, and includes the original and each copy thereof if the copy contains additional material or is not identical to the original, which is in your or your agent’s possession, custody or control or which was, but is no longer, in your or your agent’s possession, custody or control.

E. The word “identify” with respect to:

- (1) any natural person, means to state the full name; telephone number; and the last known residence and business addresses of the person and that person's relationship, whether business, commercial, professional, or personal with you;
- (2) any legal person, business entity or association, means to state the full name; telephone number; and last known address of such person or entity;
- (3) any document, means to state the type of document (e.g., a letter); the title; the subject matter; the date the document bears and the date it was written; and
- (4) any oral communication, means to state the date when and the place where it was made; the identity of the person who made it; the identity of the person to whom it was made; the identity of any other person or persons who were present or who heard it; and the substance of it.

F. "Person" shall mean an individual, partnership, proprietorship, corporation, association, and any other kind of business or legal entity.

G. "Relates to" means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

H. "Petition," "case," "proceeding," and "docket" refer to the above-captioned rate case.

## **INSTRUCTIONS**

1. To the extent that the information sought is incorporated or contained in a document, please identify the document.

2. If you object to a question on the basis of privilege, state in detail the facts on which you base your objection. If you claim a document is privileged, identify the document and state the basis for the privilege.

3. These interrogatories shall be deemed to be continuing and to require supplemental answers to the extent required by the Tennessee Rules of Civil Procedure and the rules of the Tennessee Public Utility Commission.

### **DISCOVERY REQUESTS**

1. For each month during the period January, 2016 through September, 2017, describe how BellSouth calculated the total amount due for the Two-Way Trunk Group Arrangement pursuant to Section V.B. of the Interconnection Agreement (“ICA”) referred to in AT&T’s Complaint. Include in your answer “the number of minutes of traffic identified as BellSouth’s” and the “total minutes of use on the facility” as described in Section V.B. of the ICA.

**RESPONSE:**

2. For the months of January, 2016, September, 2016, and September, 2017, describe and quantify all of the various types of traffic included in the “total minutes of use on the facility” described in Section V.B. of the ICA. The terms describing such traffic should, unless otherwise explained, be consistent with the definitions of those terms in the ICA.

**RESPONSE:**

3. For the months of January, 2016, September, 2016, and September, 2017, describe and quantify the minutes of “Intermediary Traffic” as defined in Section I.C. of the ICA. Include in your answer the identity of every originating and terminating carrier, including local exchange carriers, competitive local exchange carriers, and CMRS providers if that carrier originated or terminated more than 1% of the minutes of Intermediary Traffic.

**RESPONSE:**

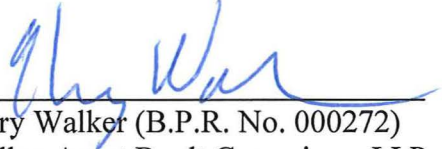
4. During the period July, 2016 through September, 2017, did BellSouth originate and deliver any Intermediary Traffic to C Spire? If so, provide the minutes delivered in each month.

**RESPONSE:**

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: \_\_\_\_\_

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of March, 2020, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

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HENRY WALKER