

NO. 1-17-79
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EXECUTIVE SECRETARY

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

**IN RE: TARIFF FILING BY UNITED TELEPHONE-SOUTHEAST, INC.
 TO REFLECT ANNUAL PRICE CAP ADJUSTMENT
 (TARIFF NO. 96-201)**

DOCKET NO.: 96-01423

**DISCOVERY REQUESTS OF AT&T COMMUNICATIONS
OF THE SOUTH CENTRAL STATES, INC. TO UNITED
TELEPHONE-SOUTHEAST, INC.**

Comes now AT&T Communications of the South Central States, Inc., pursuant to T.C.A. § 4-5-311 and Rules 33 and 34 of the Tennessee Rules of Civil Procedure, and makes these discovery requests to United Telephone-Southeast, Inc., to be answered on or before February 11, 1997, pursuant to the Initial Order of the Hearing Officer of January 27, 1997.

All discovery requests are continuing in nature, and should any circumstances relating to the subject covered thereby change during the pendency of this proceeding, please notify AT&T Communications of the South Central States, Inc. immediately of such changed circumstances.

1. In its response to item 1 of AT&T's first data request, United states, "United has not performed any cost studies since January 1990 for intrastate switched access elements affected by the proposed tariffs in this docket." (emphasis added).

Has United, then, performed any cost studies since January 1990 for intrastate switched access elements that are not directly affected by the proposed tariffs in this docket? If so, please produce all such studies.

RESPONSE:

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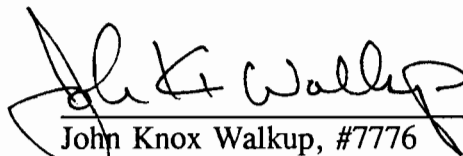
2. For any cost studies identified in item 1 above, please indicate the specific methodology for each individual cost study, e.g., embedded costs, long-run incremental costs (LRIC), total service long-run incremental costs (TSLRIC) or total element long-run incremental costs (TELRIC).

RESPONSE:

3. In its response to item 3 of AT&T's first data request, United responded that, "United has plans to complete TELRIC studies in support of unbundled network service elements to be provided under local interconnection agreements.

Does United have plans to complete TELRIC, LRIC or TSLRIC studies specifically for any switched access charge elements?

RESPONSE:



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CERTIFICATE OF SERVICE

I, John Knox Walkup, hereby certify that a true and exact copy of the foregoing Discovery Requests has been served on the following counsel of record, this 4th day of January, 1997, either by fax, hand-delivery or by placing a copy of the same in the U.S. Mail, postage prepaid, and addressed as follows:

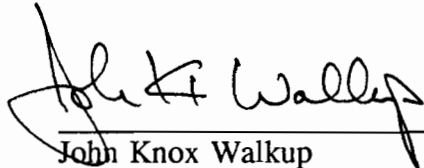
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