BOULT ▪ CUMMINGS
CONNERS ▪ BERRY PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@boultcummings.com

RECEIVED
REGULATORY AUTH.

'01 SEP 6 PM 1 34

September 6, 2001

EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*
Docket No. 97-00309

Dear David:

The intervening carriers collectively submit the attached Motion to Compel Responses by BellSouth Telecommunications, Inc. to their First Data Request to BellSouth. The request is filed on behalf of Covad Communications, Inc., MCI WorldCom, Inc., XO Tennessee, Inc., Time Warner, AT&T Communications of the South Central States, Inc. and the Southeastern Competitive Carriers Association.

Copies have been forwarded to parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker

HW/nl
Enclosure

LAW OFFICES
414 UNION STREET - SUITE 1600 - P.O. BOX 198062 - NASHVILLE - TN - 37219
TELEPHONE 615.244.2582 FACSIMILE 615.252.6380 www.boultcummings.com

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In re:	)	
BellSouth Telecommunications, Inc.'s	)	
Entry Into Long Distance (InterLATA)	)	Docket No.: 97-00309
Service in Tennessee Pursuant to	)	
Section 271 of the Telecommunications	)	
Act of 1996	)	

MOTION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., COVAD COMMUNICATIONS, INC., MCI WORLDCOM, INC., THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION, TIME WARNER AND XO TENNESSEE, INC., TO COMPEL RESPONSES BY BELLSOUTH TELECOMMUNICATIONS, INC. TO THEIR FIRST DATA REQUEST TO BELLSOUTH

Pursuant to Rule 37.01 of the Tennessee Rules of Civil Procedure and the Authority's August 28, 2001 and August 30, 2001 Orders regarding the discovery process, AT&T Communications of the South Central States, Inc., Covad Communications, Inc., MCI WorldCom, Inc., the Southeastern Competitive Carriers Association, Time Warner, and XO Tennessee, Inc. (collectively, the "CLECs"), by and through the undersigned counsel, hereby request that the Tennessee Regulatory Authority (the "Authority" or "TRA") compel BellSouth Telecommunications, Inc. ("BellSouth") to provide full and complete responses to the enumerated requests from their *First Data Request to BellSouth*, which was filed and served on BellSouth on August 21, 2001. As set forth in greater detail below, BellSouth's objections are legally insufficient to allow BellSouth to evade responding to the CLECs' discovery. Accordingly, the Authority should deny BellSouth's objections and should compel BellSouth to respond.

GENERAL RESPONSE

BellSouth's objections are inconsistent with Tennessee's discovery rules. "The Tennessee Rules of Civil Procedure embody a broad policy favoring the discovery of any relevant, non-privileged information." *Pettus v. Hurst*, 882 S.W.2d 783, 786 (Tenn. Ct. App. 1993). "[D]iscovery is intended to bring out the facts prior to trial, thereby eliminating surprise and enabling the parties to decide what is at issue." *Wright v. United Servs. Auto Ass'n*, 789 S.W.2d 911, 915 (Tenn. Ct. App. 1990). Proper discovery promotes economy and efficiency by helping to identify and narrow the issues. *See Airline Constr., Inc. v. Barr*, 807 S.W.2d 247, 263 (Tenn. Ct. App. 1990).

Discovery in Tennessee is generally governed by Rule 26.02, which provides that:

> Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party. . . . It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

Tenn. R. Civ. P. 26.02.[1] In addition, Rule 37 allows a party to apply for a motion to compel a response to a question or request that another party has failed to answer. Tenn. R. Civ. P. 37.01(2). Any answer that is evasive or incomplete is treated as a failure to answer the discovery request. Tenn. R. Civ. P. 37.01(3).

It is clear in Tennessee that the purpose and intent of Rule 26 is to eliminate the element of surprise and prevent a party who has discoverable information from making evasive, incomplete or untimely responses to requests for discovery. *See, e.g., Hood v. Roadtec, Inc.*, 785

S.W.2d 359, 362 (Tenn. Ct. App. 1989); *Ingram v. Phillips*, 684 S.W.2d 954, 958 (Tenn. Ct. App. 1984). Tennessee courts have interpreted the requirement of Rule 26 broadly to encompass any matter that bears on any issue that is in or may be in the proceeding. *See Price v. Murphy Supply Co.*, 682 S.W.2d 924, 935 (Tenn. Ct. App. 1984) (citing *Oppenheimer Fund, Inc. v. Sanders,* 437 U.S. 340, 351, 98 S. Ct. 2380, 2389 (1978)).

This is consistent with Federal Rules of Civil Procedure, which similarly "allow broad scope to discovery and this has been well recognized by the courts." Wright & Miller, Federal Practice & Procedure § 2007 (1994). It has long been established that the civil discovery provisions of the federal rules should be interpreted liberally, and that, in particular, relevance for purposes of discovery is construed very broadly. *See, e.g. Hickman v. Taylor,* 329 U.S. 495, 67 S. Ct. 385 (1947); *Oppenheimer Fund, Inc. v. Sanders,* 437 U.S. 340, 98 S. Ct. 2380 (1978); *Flora v. Hamilton*, 81 F.R.D. 576 (M.D.N.C. 1978).

Accordingly, a party opposing discovery bears the burden of demonstrating why discovery should not be permitted. *See Ellsworth Associates, Inc. v. U.S.*, 917 F. Supp. 841, 844 (D.D.C. 1996); *Chism v. County of San Bernadino, et. al.*, 159 F.R.D. 531, 533 (C.D. Cal. 1994); *In re: Harcourt Brace Jovanovich, Inc. Securities Litigation*, 838 F. Supp. 109, 114 (S.D.N.Y. 1993). Indeed, the opposing party has a heavy burden of showing good cause. *See, e.g., Motsinger v. Flynt*, 119 F.R.D 373 (M.D.N.C. 1988). In order to meet its burden, the party opposing discovery may not simply offer statements of objection; rather, specific identification

---

(Footnote cont'd from previous page.)

[1] This rule is very similar to Federal Rule of Civil Procedure 26(b)(1).

of the basis for the objection and the factual support therefor must be provided. *See Roesberg v. Johns-Manville Corp.*, 85 F.R.D. 292, 297 (E.D. Pa. 1980).

In particular, a party objecting to discovery as irrelevant bears the burden of proving that the requested discovery is not relevant to the subject matter of the case. *Flora,* 81 F.R.D. at 578; *Teichgraeber v. Memorial Union Corp. of the Emporia State Univ.*, 932 F. Supp. 1263, 1266 (D. Kan. 1996). "More than a conclusory statement that the discovery is irrelevant must be offered, the opposing party must show specifically how the request is not reasonably calculated to lead to the discovery of admissible evidence," and "[c]ourts should lean towards resolving doubt over relevance in favor of discovery." *Teichgraeber*, 932 F. Supp. at 1266. The party opposing discovery as irrelevant must demonstrate that the requested information either does not come within the broad scope of discovery set forth in the rules of civil procedure or else is "of such marginal relevance that the potential harm occasioned by discovery would outweigh the normal presumption in favor of broad disclosure." *Burke v. New York City Police Dep't*, 115 F.R.D. 220, 224 (S.D.N.Y. 1987).

Similarly, "the burden is on the party objecting to show that responding to the discovery is unduly burdensome." *Snowden v. Connaught Laboratories, Inc.*, 137 F.R.D. 325, 332 (D. Kan. 1991). The fact that a discovery request would produce a substantial volume of responsive material or would cause the producing party to invest substantial time and effort to respond to the discovery is generally not a sufficient reason to deny discovery. *Id.* "Requiring a responding party to perform extensive research or to compile substantial amounts of data and information does not automatically constitute an undue burden." *Capacchione v. Charlotte-Mecklenburg Schools,* 182 F.R.D. 486, 491 (W.D.N.C. 1998).

BellSouth's objections to the CLECs' discovery requests are generally limited to pro forma, non-specific objections based on burden and relevance. BellSouth has not provided sufficient rationale or support for its objections. The Authority, therefore, should deny BellSouth's objections and should order BellSouth to respond to the CLECs' enumerated discovery requests.

THE CLECS' RESPONSES TO BELLSOUTH'S GENERAL OBJECTIONS

BellSouth's boilerplate objections to the CLECs' discovery are insufficient to allow BellSouth to evade its discovery obligations. *See Athridge v. Aetna Casualty and Surety Co.*, 184 F.R.D. 181, 190 (D.D.C. 1998); *Pulsecard, Inc. v. Discover Card Services, Inc.*, 168 F.R.D. 295, 303 (D. Kan. 1996). Such general, wholesale objections to discovery do not comply with the requirement that BellSouth must specifically identify the basis and factual support for each objection. *See Roesberg*, 85 F.R.D. at 297. BellSouth's objections serve only to prevent the disclosure of otherwise discoverable material and frustrate the purpose of this proceeding. Accordingly, the Authority should disregard BellSouth's boilerplate "General Objections" and compel the disclosure of full and complete answers to the CLECs' discovery requests.

Further, as to BellSouth's General Objection concerning privileges, if BellSouth withholds any responsive information on the grounds that it is privileged, BellSouth must specifically identify all such information that it withholds. As requested in the "Instructions for Use and Definitions" section of the CLECs' *First Data Request to BellSouth*, BellSouth should prepare a Privilege Log identifying all such information.

AT&T'S RESPONSES TO BELLSOUTH'S SPECIFIC OBJECTIONS TO AT&T'S INTERROGATORIES

In its responses, BellSouth has made the following objections to AT&T's Interrogatories:

BellSouth has objected that AT&T's Interrogatory Numbers 21, 24, 27 and 28 are overbroad and unduly burdensome. In addition, BellSouth has objected that AT&T's Interrogatory Numbers 21, 23, 24, 27 and 28 are not relevant and/or not reasonably calculated to lead to the discovery of admissible evidence. BellSouth provided no specific explanation for its objections to any of these interrogatories.

Interrogatory Number 21 requests the identity of individuals associated with BellSouth's review and implementation of change requests. BellSouth's relevance objection is inappropriate, because BellSouth's change control process is crucial to nondiscriminatory access to the OSS and is therefore under scrutiny in this docket. The recent discovery of BellSouth's secret plans to sunset many of its interfaces underscores the importance of evaluation of the change control process.

BellSouth also objects to this interrogatory on the ground that it is overbroad and unduly burdensome. BellSouth, however, has not only failed to describe a burden which rises to the level of undue hardship, it has failed to identify any burden at all, other than the fact that it would have to provide information in response to this request. BellSouth has not provided a single reason why this request is overbroad or burdensome. Without at least providing some reason, BellSouth cannot possibly meet its burden of demonstrating that this request imposes some undue hardship on BellSouth in providing the requested information. Indeed, AT&T cannot even respond to this objection in detail, because BellSouth has failed to provide any rationale or justification for AT&T to respond to. *See Athridge*, 184 F.R.D. at 181.

Interrogatory Number 23 requests the turnover rates of BellSouth's Local Carrier Service Center ("LCSC") employees. BellSouth's relevance objection is inappropriate, because BellSouth's service representatives are an important component of its OSS. The experience and ability of these representatives is certainly relevant to an investigation of whether the support services they provide are at parity with the services provided to BellSouth's retail customers.

Interrogatory Number 24 requests the identity of individuals who are knowledgeable about BellSouth's internal measures of its productivity and performance in several areas. BellSouth's relevance objection is inappropriate, because a comparison of BellSouth's internal productivity and performance measures with the external measures applied by various commissions and third-party tests will reflect upon the accuracy and completeness of the external measures, which are part of the Section 271 evaluation. Moreover, BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objection, so, as AT&T explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard it.

Interrogatory Numbers 27 and 28 request the identification of BellSouth's internal measures of its productivity and performance in a number of areas and identification of the internal reports BellSouth uses to communicate and analyze the data from these measures. BellSouth's relevance objections are inappropriate, because a comparison of BellSouth's internal productivity and performance measures with the external measures applied by various commissions and third-party tests will reflect upon the accuracy and completeness of the external measures, which are part of the Section 271 evaluation. Moreover, BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objections, so, as AT&T

explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard them.

In its responses, BellSouth has made the following objections to AT&T's Document Requests:

BellSouth has objected that AT&T's Document Request Numbers 14, 16 and 19-22 are overbroad and unduly burdensome. In addition, BellSouth has objected that AT&T's Document Request Numbers 2, 16 and 19-22 are not relevant and/or not reasonably calculated to lead to the discovery of admissible evidence. BellSouth provided no specific explanation for its objections to any of these document requests.

Document Request Number 2 requests documents referring or relating to economic studies of the demand or market for local telephone services in BellSouth's states or region. BellSouth's relevance objection is inappropriate, because BellSouth has submitted testimony in this docket on the issue of the present and projected levels of competition. (*See* Testimony of John A. Ruscilli, filed July 30, 2001, at 19.)

Document Request Number 14 requests documents related to BellSouth's internal change control process for its own internal OSS and for the CLEC OSS. BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objection, so, as AT&T explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard it.

Document Request Number 16 requests copies of minutes and notes from meetings addressing BellSouth's review and implementation of change requests under the change control process. BellSouth's relevance objection is inappropriate, because BellSouth's change control process is crucial to nondiscriminatory access to the OSS and is therefore under scrutiny in this

docket. The recent discovery of BellSouth's secret plans to sunset many of its interfaces underscores the importance of evaluation of the change control process. Moreover, BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objection, so, as AT&T explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard it.

Document Request Numbers 19-20 request documents associated with the beta testing of the CLEC and Vendor Application Evaluation ("CAVE") testing environment and with the use of CAVE by CLECs and vendors related to the implementation of Release 9.4. BellSouth's relevance objections are inappropriate, because the ability for CLECs to perform testing in anticipation of an upgrade or the implementation of a new interface without risking service to actual customers is crucial to nondiscriminatory access to the OSS and is therefore under scrutiny in this docket. The recent discovery of BellSouth's secret plans to sunset many of its interfaces underscores the importance of evaluation of the test environment. Moreover, BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objections, so, as AT&T explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard them.

Document Request Numbers 21-22 request data and reports generated by the internal measures identified in Interrogatory Number 19. In fact, these requests, along with Document Request Number 23, contain an inadvertent error, and they should refer instead to Interrogatory Number 27.[2] BellSouth's relevance objections are inappropriate, because a comparison of

[2] AT&T notes that these requests refer to "internal measures" and that BellSouth objected to Interrogatory Number 27, as referenced above. In the interest of efficiency, AT&T responds under the assumption that BellSouth's

(Footnote cont'd on next page)

BellSouth's internal productivity and performance measure results with the results from the external measures applied by various commissions and third-party tests will reflect upon the accuracy and completeness of the external measures, which are part of the Section 271 evaluation. Moreover, BellSouth has not provided the required explanation for its overbreadth/unduly burdensome objections, so, as AT&T explains in its Response to BellSouth's objection to Interrogatory Number 21, the Authority should disregard them.

RESPONSES OF MCI, COVAD AND OTHER CLECS TO BELLSOUTH'S OBJECTIONS TO DISCOVERY

In its objection to Interrogatory Number 35, BellSouth objects to identifying the carrier to which a former MCI customer migrated. MCI will therefore modify that part of its request as follows: Please state whether each former MCI customer migrated to BellSouth Telecommunications, Inc. or a BellSouth affiliate, or to a competing local exchange carrier.

In its objection to Interrogatory Number 37, BellSouth states that it will provide the requested information "from May 1, 2001, forward." MCI objects that this time frame is too limited to be useful and asks that BellSouth be ordered to provide the requested information, if available, for the most recent twelve-month period.

In its objection to Interrogatory Number 38, BellSouth states that "MCI already has this information" concerning the reasons for "MCI-caused rejects during a week of July, 2001." The reasons given by BellSouth to MCI at the time may or may not be the same reasons which

---

(Footnote cont'd from previous page.)

responses to the corrected Document Requests would be the same. If this is not the case, AT&T will address BellSouth's subsequent responses as necessary.

BellSouth must provide now, under oath, pursuant to the rules of discovery. Accordingly, MCI requests that the Authority compel BellSouth's response.

In its objection to Interrogatory Number 39, BellSouth states that the question is "vague." Read in isolation it is vague. Read in conjunction with Question 38, the meaning of the question is clear: For the same work referenced in Question 38, please explain why orders fell out for reasons other than "MCI-caused" problems.

In Interrogatory Number 58, CLECs seek a side by side comparison of the tasks performed and the respective times for each task when BellSouth's retail unit and BellSouth's wholesale unit each provide high speed data (DSL) using the high frequency spectrum of an existing voice loop. This information could provide the Authority and CLECs with valuable information from which to determine whether BellSouth is providing service to CLECs in parity with the service it provides for its own retail unit. BellSouth has publicly boasted that it intends to be providing ADSL service to over 600,000 customers region-wide by the end of 2001. BellSouth provides ADSL using the high frequency spectrum of an existing voice loop. Accordingly, BellSouth is legally obligated to provide CLECs with nondiscriminatory access to the high frequency spectrum of the unbundled local loop. By comparing the respective tasks and task times, the Authority can better understand whether BellSouth is providing such nondiscriminatory access and whether that access is at parity with BellSouth's retail offerings. BellSouth's sole basis for objecting to this legitimate request from CLECs is that "BellSouth does not engage in line sharing for itself." BellSouth's objection raises form over substance. Line Sharing is nothing more than shorthand for providing DSL using the high frequency spectrum of a voice grade loop, which BellSouth undoubtedly does.

Interrogatory Number 61 seeks information about the terms and conditions under which BellSouth will continue to offer ADSL using the high frequency spectrum of an existing voice loop when a customer elects to obtain voice service from another carrier. BellSouth's sole basis for objecting to this legitimate request from CLECs is that "BellSouth does not engage in line sharing for itself." BellSouth's objection raises form over substance. Line Sharing is nothing more than shorthand for providing DSL using the high frequency spectrum of a voice grade loop, which BellSouth undoubtedly does. Therefore, BellSouth's objection should be overruled.

BellSouth has failed to state a cognizable legal objection to Interrogatory Number 67. The Interrogatory requests information regarding what steps BellSouth is taking to reduce its line sharing delivery intervals. Provisioning of line sharing in an efficient and nondiscriminatory manner is a pre-requisite for incumbent carriers seeking to obtain authority to provide long distance service. CLECs believe, for example, that BellSouth has failed to meet its current legal obligations to provide line sharing consistent with loop delivery intervals in its existing interconnection agreements with some CLECs and seek information about what steps, if any, BellSouth is taking to improve performance. Therefore, BellSouth's objection should be overruled.

BellSouth has failed to state a cognizable legal objection to Interrogatory Number 69. The Interrogatory requests information regarding what steps BellSouth is taking to reduce its line sharing delivery intervals. Provisioning of line sharing in an efficient and nondiscriminatory manner is a pre-requisite for incumbent carriers seeking to obtain authority to provide long distance service. CLECs believe, for example, that BellSouth has failed to meet its current legal obligations to provide line sharing consistent with loop delivery intervals in its existing interconnection agreements with some CLECs and seek information about what steps, if any,

BellSouth is taking to improve performance. Therefore, BellSouth's objection should be overruled.

In Interrogatory 82, CLECs seek information about BellSouth use of universal service funds to extend its DSL network and to further dominate the DSL market in Tennessee. BellSouth's use of universal service funds, if any, for deployment of DSL or other advanced services in Tennessee impacts the ability of CLECs to compete for DSL customers in Tennessee. Moreover, BellSouth recognizes that this information potentially provides evidence that BellSouth has obtained an unfair advantage in pricing its DSL products by subsidizing retail DSL through use of universal service funds. Such anticompetitive conduct is clearly relevant to BellSouth's application for Section 271 approval as well as relevant to this Authority's ongoing obligation to insure that CLECs in Tennessee have a meaningful opportunity to compete in this state. BellSouth's boilerplate objection is without merit and should be overruled.

In its objection to Interrogatory Number 100, BellSouth objects to providing copies of CLEC complaints concerning BellSouth's OSS since January 1, 2000 because the request is "overbroad" and because some CLEC complaints are allegedly "confidential." The Intervenors will amend the request to encompass all such complaints during the most recent twelve-month period. Since all parties have signed the TRA-approved proprietary agreement, BellSouth's claim of confidentiality has no merit.

CONCLUSION

For the foregoing reasons, the CLECs respectfully request that the Authority order BellSouth to provide full and complete responses to each of the enumerated Interrogatories and Document Requests. The CLECs request any additional relief the Authority deems appropriate, including an award of the costs and attorneys' fees associated with this Motion.

September 6, 2001

Respectfully submitted,

By: _____

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, TN 37219
(615) 252-2363
Counsel for the Southeastern Competitive Carriers Association, Inc., XO Tennessee, Inc., and Covad Communications, Inc.

_____

Jon Hastings
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, TN 37219
(615) 252-2306
Counsel for MCI WorldCom, Inc.

_____

Charles B. Welch
Farris, Mathews, et al.
618 Church Street, Suite 300
Nashville, TN 37219
Counsel for Time Warner

_____

Jim Lamoureaux
AT&T Communications of the South Central States
1200 Peachtree Street, NE
Room 4060
Atlanta, GA 30309

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of September, 2001, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

H. LaDon Baltimore, Esq.
Farrar & Bates
211 Seventh Ave. No., #320
Nashville, TN 37219-1823

Charles B. Welch, Esq.
Farris, Mathews, et al
618 Church St., Suite 300
Nashville, TN 37219

Jon E. Hastings, Esq.
Boult, Cummings, et al.
P.O. Box 198062
Nashville, TN 37219-8062

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street, #2101
Nashville, TN 37201-3300

Jim Wright, Esq.
United Telephone-Southeast
14111 Capital Blvd.
Wake Forest, NC 27587

Andrew M. Klein, Esq.
Kelley Drye & Warren, LLP
1200 19th Street, NW
Washington, DC 20036

Donald L. Scholes, Esq.
Branstetter, Kilgore, Stranch & Jennings
227 Second Ave., North
Nashville, TN 37210-1631

Dana Shaffer, Esq.
XO Tennessee, Inc.
105 Molloy St.
Nashville, TN 37201

John McLaughlin, Jr.
Director, State Government Affairs
KMC Telecom
1755 North Brown Rd.
Lawrenceville, TN 30043

Guilford Thornton, Esq.
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219

D. Billye Sanders, Esq.
Waller, Lansden, Dortch & Davis
511 Union Street, #2100
Nashville, TN 37219-1750

Tim Phillips, Esq.
Attorney General's Office
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202

Jim Lamoureux, Esq.
AT&T Communications of the South
Central States
1200 Peachtree St., NE
Room 4060
Atlanta, GA 30309

Andrew O. Isar, Esq.
Directory – Industry Relations
Telecommunications Resellers Association
4312 92nd Ave.
Gig Harbor, WA 98335

Nanette Edwards, Esq.
ITC^ DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802