

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Northeast Missouri Rural Telephone Company	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. _____
	)	
AT&T Corp.	)	
	)	
Respondent.	)	

Northeast Discovery Requests to AT&T Corp.

Come now Northeast Missouri Rural Telephone Company, (hereinafter “Northeast”), for its Initial Discovery Requests (Data Requests, Interrogatories, Requests for Production of Documents, or Requests for Admission) and propounds the following requests to Respondent AT&T Corp. (hereinafter “AT&T”). These discovery requests are continuing in nature and the responses must be updated as needed to remain accurate. Each response will be subject to the following conditions:

A. The terms “AT&T”, “you” and “your” refers to Respondent AT&T Corp., its employees, and any person acting on behalf of the responding company.

B. K. The terms “Enhanced Prepaid Calling Card Service” refers to the prepaid calling card service for which you filed a May 15, 2003 Petition for Declaratory Ruling with the Federal Communications Commission (FCC), as referenced in the FCC’s February 23, 2005 Order and Notice of Proposed Rulemaking, FCC 05-41, WC Docket No. 03-133 and WC Docket No. 05-68.

C. In answering these requests, all information is to be divulged which is possessed by or available to you. If in your response you state you relied upon or in any manner used, in whole or in part, Northeast supplied data or information, please set forth the specific data/information relied upon and the source of that information, including but not limited to: the name of the individual supplying the information and the date supplied, the number of the data request from which the data/information was obtained, and the response document relied upon together with the page, section and line number within the document.

D. "Documents" or "documentation" include writings, drawings, memoranda, correspondence including e-mails, graphs, charts, photographs and other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form. This request includes the original or principal copy in your possession, custody or control, and any non-identical copy (which is different from the original because of notations on such copy or otherwise), and any drafts, copies or other preliminary material different in any way from the final document.

E. For each document produced, identify the numbered data request to which it responds.

F. "Person" shall mean the plural as well as the singular and shall include any natural person and any firm, association, partnership, joint venture, corporation, governmental or public entity, department, agency, office or any other form of legal entity.

G. To "identify" a person shall mean to state with respect thereto: (1) his, her, or its name and last known address and, in addition, if a natural person, his or her last known non-business address; and (2) if a natural person, the name and last known business address of his or

her employer, the employment position held by such employee with each employer and the date when such employment began or ceased.

H. To “identify” a document means to state its type or otherwise describe it, and in addition to supply the following information where applicable: (1) the name of the person who prepared it; (2) the name of the person who signed it or in whose name it was issued; (3) the name of each person to whom it was addressed or distributed; (4) the nature and substance of the writing, with sufficient particularity to enable it to be identified; and (5) its date, or if it bears no date, its approximate date.

I. When asked for a rationale or explanation for a position this request shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing directly or indirectly concerning the subject matter of the description, listing all pertinent dates, documents, communications, persons and locations applicable to the event or occurrence that is the subject of the data request.

J. These requests are intended to be of a continuing nature, requiring you to serve timely supplemental answers setting forth any information subsequently discovered which would add to or alter the accuracy or completeness of the information originally provided. Objections will be made at the time of the hearing to any attempt to try to introduce evidence which is directly sought by this data request and to which no disclosure has been made.

K. For each response provided, identify the name of the individual responding and the date supplied. The person signing or identified as responsible for the response certifies that the information provided to Northeast in response to the information requested is accurate and complete and contains no material misrepresentations or omissions based upon present facts known to the person(s) who signs as responsible for the answers.

DISCOVERY REQUESTS

Document Request 1. Please produce a copy of your May 15, 2003 Petition for Declaratory Ruling filed with the Federal Communications Commission (FCC), as referenced in the FCC's February 23, 2005 Order and Notice of Proposed Rulemaking, FCC 05-41, WC Docket No. 03-133 and WC Docket No. 05-68, including all attachments thereto.

Interrogatory 1. Please state the date you began classifying Enhanced Prepaid Calling Card Service calls that originated and terminated in the same state, when the calling and called parties are both in the same state, as being subject to interstate exchange access charges.

Document Request 2. Please produce copies of all documents of AT&T confirming the date which is the subject of Interrogatory 1.

Interrogatory 2. Please state the date you stopped classifying Enhanced Prepaid Calling Card Service calls that originated and terminated in the same state, when the calling and called parties are both in the same state, as being subject to interstate exchange access charges.

Document Request 3. Please produce copies of all documents of AT&T confirming the date which is the subject of Interrogatory 2.

Interrogatory 3. Please identify all persons who participated in the decision to classify Enhanced Prepaid Calling Card Service calls that originated and terminated in the same state as being subject to interstate exchange access charges.

Interrogatory 4. Please describe with specificity the role that each person identified in your answer to the preceding interrogatory had with respect to this decision.

Interrogatory 5. Please identify all documents prepared by, or considered by, the persons identified in your answer to Interrogatory 3 in making the decision to classify Enhanced Prepaid Calling Card Service calls that originated and terminated in the same \$340 million in access savings

Document Request 4. Produce copies of all documents identified in your response to Interrogatory 5.

Interrogatory 6. In your 3rd Quarter 2004 SEC 10-Q report, you stated your current classification of prepaid card calls as interstate, when the persons communicating are both in the same state and the enhanced platform is in a different state, has generated \$340 million in access savings since the third quarter of 2002, and approximately \$160 million in universal service fund contribution savings since the beginning of 1999.

- a. please state why the access savings was computed back to the third quarter of 2002.
- b. please state why the USF contribution savings was calculated since the beginning of 1999.
- c. please state how much of the \$340 million exchange access savings reported was for intrastate originating exchange access.
- d. please state how much of the \$340 million exchange access savings reported was for intrastate terminating exchange access.
- e. please state how much of the \$340 million exchange access savings reported was attributable to traffic originating from Northeast.
- f. please state how much of the \$340 million access savings reported was attributable to traffic terminating to Northeast.

Interrogatory 7. Describe with specificity how you calculated the amounts described in your answers to Interrogatory 6 above.

Document Request 5. Please produce copies of all documents containing assumptions, work papers, summaries, schedules, reports, spreadsheets, or calculations underlying or resulting in the \$340 million access savings referenced in Interrogatory 6.

Document Request 6. Please produce copies of all documents containing assumptions, work papers, summaries, schedules, reports, spreadsheets, or calculations underlying or resulting in the access savings resulting from traffic originating from or terminating to Northeast identified in your answers to subparts (e) and (f) of Interrogatory 6.

Document Request 7. Please produce a copy of your 2004 SEC 10-K report.

Document Request 8. Please produce a copy of your 2005 SEC 10-K report.

Document Request 9. Please produce a copy of your 2006 SEC 10-K report.

Document Request 10. Please produce a copy of your 2007 SEC 10-K report.

Interrogatory 8. For Enhanced Prepaid Calling Card Service calls which were dialed 1 + 8YY, that originated and terminated in the same state, when the calling and called parties are both in the same state, during the period you classified such calls as being subject to interstate exchange access, please state:

- a. whether you passed the Calling Party's Number with the call.
- b. whether you passed the Called Party's Number with the call.
- b. what number or charge number you assigned to the platform that requested the caller's PIN and routed the call.
- c. how you determined what platform would be assigned to each call.

Admission Request 1. Please admit that your answer to Interrogatory 8 applied to such calls originated from a Northeast exchange, and for such calls terminated to a Northeast exchange.

Interrogatory 9. Please identify each platform you assigned to handle Enhanced Prepaid Calling Service calls to or from Northeast exchanges from 1999 to the present, please state:

- a. the location of each such platform.
- b. the NPA-NXX-XXXX telephone number assigned to each such platform.
- c. the inclusive dates each such platform was in use.
- d. the inclusive dates each such assigned telephone number was in use.
- e. whether each such number was a working number.
- f. why each platform was assigned to handle calls to or from Northeast.

Interrogatory 10. Describe with specificity the method or methods by which calls using Enhanced Prepaid Calling Card Service were routed from your originating Point of Presence to the Enhanced Prepaid Calling Card Service platform and from the Enhanced Prepaid Calling Card Service platform to your terminating Point of Presence, including in your response a description of the network equipment involved, the platforms used, call flows, and call records produced (EMI, SS7, AMA , proprietary formats, etc.).

Interrogatory 11. Identify all persons who participated in designing the network architecture or determining call paths set forth in your response to Interrogatory 10.

Interrogatory 12. Identify all documents reflecting the methods, routing, or descriptions set forth in your response to Interrogatory 10.

Document Request 11. Please produce the documents identified in your response to Interrogatory 11 for inspection and duplication.

Interrogatory 13. For Enhanced Prepaid Calling Card Service calls originated in a Northeast exchange and terminated to a called party also in Missouri, did you retain records or documents from which the volume of such calls between 1999 and the present can be ascertained?

Interrogatory 14. If your answer to Interrogatory 13 is in the affirmative, please identify such records or documents.

Document Request 12. Please produce the records or documents identified in your response to Interrogatory 14 for inspection and duplication.

Interrogatory 15. For Enhanced Prepaid Calling Card Service calls originated in Missouri and terminated to a called party in a Northeast exchange (also in Missouri), did you retain records or documents from which the volume of such calls between 1999 and the present can be ascertained?

Interrogatory 15. If your answer to Interrogatory 15 is in the affirmative, please identify such records or documents.

Document Request 13. Please produce the records or documents identified in your response to Interrogatory 15 for inspection and duplication.

Interrogatory 16. Have you prepared or used, for any purpose including settlement of claims similar to that of Northeast's in this proceeding, a method or model for estimating the amount of originating Enhanced Prepaid Calling Card Service traffic that you reported as being subject to interstate exchange access charges, when such traffic originated in an incumbent local exchange carrier's exchanges and terminated in the same state?

Interrogatory 17. If your answer to Interrogatory 16 is in the affirmative, please identify each such method or model.

Document Request 14. Please produce the methods and models identified in your response to Interrogatory 17 for inspection and duplication.

Interrogatory 18. Have you prepared or used, for any purpose including settlement of claims similar to that of Northeast's in this proceeding, a method or model for estimating the amount of terminating Enhanced Prepaid Calling Card Service traffic that you reported as being subject to interstate exchange access charges, when such traffic originated in an incumbent local exchange carrier's exchanges and terminated in the same state?

Interrogatory 19. If your answer to Interrogatory 18 is in the affirmative, please identify each such method or model.

Document Request 15. Please produce the methods and models identified in your response to Interrogatory 19 for inspection and duplication.

Interrogatory 20. Have you ever applied or run a method or model identified in your responses to Interrogatories 17 and 19 to Northeast to ascertain or estimate the volume of traffic to or from Northeast that was classified or reported as being interstate instead of intrastate access traffic for any period of time?

Interrogatory 21. If your response to Interrogatory 20 is in the affirmative, please identify each such application, run, ascertainment, or estimate.

Document Request 16. Please produce the applications, runs, ascertainment, or estimates identified in your response to Interrogatory 21 for inspection and duplication.

Interrogatory 22. For each resolution or settlement of a claim brought against you by a local exchange carrier arising out of your decision to classify Enhanced Prepaid Calling Card Service calls that originated and terminated in the same state as being subject to interstate exchange access charges, please state the following:

- a. the manner of resolution;
- b. the amount of the settlement;
- c. the number of minutes of originating intrastate exchange access usage the local exchange carrier provided for such calls;
- d. the number of minutes of terminating intrastate exchange access usage the local exchange carrier provided for such calls;
- e. a comparison of the settlement amount to the amount of that carrier's proportion of the \$340 million in access savings set forth in your 3rd Quarter 2004 SEC 10-Q report.

_____/s/_____
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