

Exhibit No.: Big River No. 12  
Sponsoring Party: Big River Telephone  
Company, LLC  
Case No.: TC-2012-0284

Filed  
January 16, 2013  
Data Center  
Missouri Public  
Service Commission

**BIG RIVER TELEPHONE COMPANY, LLC'S**

**EXHIBIT NO. 12**

**AT&T MISSOURI'S RESPONSE TO INTERROGATORY NO. 8**

Big River Exhibit No. 12  
Date 1-09-13 Reporter KE  
File No. TC-2012-0284

8. Please identify each and every written document prepared, obtained or possessed by AT&T Missouri regarding the facts and circumstances alleged in the pleadings filed herein, which were provided to or reviewed by William Greenlaw, Mark Neinast, and/or Janice Mullins.

**Objection:** AT&T Missouri objects to this request on the grounds that it is vague, overbroad, and unduly burdensome, and it seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving its objections, AT&T Missouri provides the following response.

**Answer:**

- Big River Filed Complaint
- Big River Discovery Responses
- Big River Filed Direct testimony and exhibits
- Big River Filed Rebuttal testimony and exhibits
- MoPSC Staff Filed Rebuttal testimony
- Big River Filed Surrebuttal testimony and exhibits
- Big River website
- All exhibits provided in Filed Direct, Rebuttal and Surrebuttal testimony of William Greenlaw
- All exhibits provided in Filed Direct, Rebuttal and Surrebuttal testimony of Mark Neinast
- 2009 Settlement Agreement referenced by Big River in Paragraph 21 of its Filed Complaint initiating this case
- Interconnection Agreement, as amended, between Big River LLC and Southwestern Bell Telephone Company d/b/a AT&T Missouri
- FCC No. 73 and P.S.C Mo No. 36 – Access Services Tariff
- 47 U.S.C §§ 153
- Missouri Revised Statutes (specifically Chapter 386 and 392)
- E-mails from Carol Kenney, Lori Woodard, Teresa Castle, Janice Mullins and Christine Chou regarding the Big River usage data request referenced in Mr. Jennings Rebuttal testimony
- E-mails from Scott Mcphee, Stanley Mensinger, Teresa Donnell and Joanne Xenelis regarding verification of access rates being billed to Big River
- Excel document summarizing usage data provided to Big River on February 15, 2012
- Missouri ERE rules
- Big River Letter of April 19, 2011 regarding BAN 110 401 0113 803, with Attachment
- AT&T and Big River Settlement Agreement in 2009
- Big River Enhanced Features Letter to AT&T
- Emails between John Jennings and Eileen Mastracchio regarding who will handle Big Rivers IDR
- Missouri Public Service Commission, Annual Report Instructions; For

Telecommunications Companies and IVoIP Providers

- AT&T Response Letter 090611
- AT&T response letter 110111 document
- LSC File ID 501631
- Big River invoking Formal Dispute with MPSC
- TC-2012-0284 Order
- TC-2012-0284 Complaint
- TC-2012-0284 Mediation Letter
- TC-2012-0284 Mediation Statement
- Big River Discovery Responses
- E-mails from Stanley Mensinger and counsel (privileged)
- Excel document summarizing usage data provided to Big River on February 15, 2012
- John Jennings' May 19, 2011 letter to Janice Mullins
- Mr. Howe's deposition
- Big River trunk group records provided by Theresa Donnell in TP&E
- Technical analysis provided by Wayne Heinmiller in AT&T Labs concerning CODEC information
- FCC Order on Reconsideration WC Docket 06-1232/CC Docket 96-45
- Missouri HB No. 1779
- Missouri ERE rules

Exhibit No.: Big River No. 13  
Sponsoring Party: Big River Telephone  
Company, LLC  
Case No.: TC-2012-0284

**BIG RIVER TELEPHONE COMPANY, LLC'S**

**EXHIBIT NO. 13**

**AT&T MISSOURI'S RESPONSE TO INTERROGATORY NO. 15**

15. State the names of every individual employed by AT&T Missouri, or otherwise acting as an agent of AT&T Missouri, who was involved in any attempt to resolve the current dispute with Big River prior to the filing of Big River's Complaint, and for each individual identified, please state:

- a) by whom that individual was employed;
- b) in what capacity that individual was employed;
- c) the nature of that individual's involvement in the dispute; and
- d) the date on which that individual became involved in the dispute.

**Objection:** AT&T Missouri objects to this request on the grounds that it is vague, overbroad, and unduly burdensome, and it seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving its objections, AT&T Missouri provides the following response.

**Answer:**

Stanley Mensinger

- a) Employed by AT&T Services, Inc., an affiliate of AT&T Missouri
- b) Lead Product Marketing Manager
- c) Product Manager who is Subject Matter Expert (SME) for intercarrier compensation for VOIP and Enhanced Services
- d) July 14, 2011

Annamarie Lemoine

- a) Employed by AT&T Services, Inc., an affiliate of AT&T Missouri
- b) General Attorney-Wholesale Regulatory
- c) Legal advice
- d) July 15, 2011

Janice Mullins

- a) Employed by AT&T Services, Inc., an affiliate of AT&T Missouri
- b) Billing Dispute Escalation Team-Sr. Carrier Account Manager
- c) Manage AT&T compliance activities related to the Informal Dispute Resolution (IDR) and/or Formal Dispute (e.g. PUC) requests initiated per section 251/252 Interconnection Agreements. Negotiate Settlements with both CLEC's and ILEC's to resolve informal disputes in the 22 State AT&T footprint.
- d) May 4, 2011

Paul Monti

- a) Employed by AT&T Services, Inc., an affiliate of AT&T Missouri
- b) Director Product Marketing Manager
- c) Director over VOIP and Enhanced Services
- d) July 1, 2011