

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Consideration of BellSouth  
Telecommunications, Inc.'s entry into  
interLATA services pursuant to Section  
271 of the Federal Telecommunications  
Act of 1996.  
\_\_\_\_\_ /

Docket No. 960786-TL

**REBUTTAL TESTIMONY**

**AND EXHIBIT**

**OF**

**RODNEY PAGE**

**ON BEHALF OF**

**ACCESS INTEGRATED NETWORKS, INC.**

**JULY 20, 2001**

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1           **Q.    Please state your name and business address.**

2           A.    My name is Rodney Page. My business address is 4885 Riverside Drive, Suite  
3                    101, Macon, Georgia 31210.

4           **Q.    What position do you hold with ACCESS?**

5           A.    I am Vice President for Marketing and Strategic Development.

6           **Q.    What is the purpose of your testimony?**

7           A.    The thrust of the testimony of BellSouth witness Cynthia Cox is that all is  
8                    healthy and well with respect to the development of competition in Florida. In  
9                    my testimony I will show that, to the contrary, the development of competition  
10                   is being hampered by overt conduct on the part of BellSouth. I will recount some  
11                   of ACCESS' negative experiences with BellSouth that I believe should bear on  
12                   the Commission's evaluation of whether BellSouth has shown the degree of  
13                   compliance with its obligations under the 1996 Telecommunications Act that is  
14                   a condition precedent to its entry into the interLATA toll market.

15          **Q.    Which issues will you address?**

16          A.    My testimony pertains to Issue 2, which addresses whether BellSouth has  
17                   provided interconnection and access in the manner required by the Act; and Issue  
18                   3, which addresses whether BellSouth is providing unbundled network elements  
19                   on terms that are just, reasonable, and non-discriminatory.

20          **Q.    Please describe ACCESS Integrated Networks, Inc.**

21          A.    ACCESS is a small but growing ALEC that provides alternative local exchange  
22                   service in the nine states in which BellSouth is the ILEC. ACCESS'  
23                   headquarters are in Macon, Georgia. ACCESS currently has 57,000 access lines,

1 of which some 3,000 are in Florida. ACCESS serves small to medium sized  
2 business customers. Our business plan includes service to smaller communities  
3 in which business customers typically do not have as many alternatives as those  
4 located in larger metropolitan areas.

5 To serve its customers, ACCESS utilizes unbundled network elements  
6 (the "UNE-P" platform) that it obtains from BellSouth. Accordingly, ACCESS'  
7 ability to provide service of high quality to its customers is dependent upon the  
8 degree to which BellSouth fulfills its obligations to ACCESS.

9 **Q. Describe ACCESS' experiences with BellSouth that bear on BellSouth's**  
10 **application for authority to enter the interLATA market.**

11 **A.** At the outset, I wish to provide the perspective from which I offer these  
12 comments. My understanding is that stated in overall terms, the test to be applied  
13 in this case is whether BellSouth has fully opened its network to competition. In  
14 applying the test, as it has been formulated into more specific issues, I urge the  
15 Commission not to take an overly mechanical approach to its task. To use an old  
16 but apt phrase, there is a danger of not seeing the forest because of the trees.

17 ACCESS' experience is that BellSouth engages in conduct that impedes  
18 and stifles competition. In what follows, I am not offering a legal opinion; the  
19 relationship between the facts that I will describe and the legal requirements of  
20 the 1996 Act will be argued by the attorneys. However, as a businessman  
21 involved in the implementation of the 1996 Act in the marketplace, I can see the  
22 impact of BellSouth's behavior on the development of competition. Subissue  
23 2(f) asks whether BellSouth has satisfied "other associated requirements" for the

1 item. One such "associated requirement" is the obligation in Section 251(c)(2)  
2 that such interconnection be of a quality at least equal to that which BellSouth  
3 provides to itself. It appears to me, for instance, that if BellSouth interacts  
4 negatively with ACCESS' customer relationships in a way it does not with its  
5 own customers, and in a manner that undermines in the marketplace the  
6 competition that the 1996 Act was intended to facilitate, then the Commission  
7 should question whether BellSouth is offering interconnection and access of a  
8 quality at least equal to that which is provides to itself.

9 **Q. Please describe the negative experiences to which you refer.**

10 A. We have found, to our profound disappointment, that BellSouth frequently  
11 endeavors to create doubt or concern in the minds of ACCESS' customers or  
12 potential customers regarding the quality of service they will receive if they  
13 switch to or remain with ACCESS.

14 The experiences range from the claim that a customer will lose its listing  
15 in the directory if it changes to ACCESS, to the message that a customer's  
16 maintenance will suffer as a result of changing from BellSouth to ACCESS, to  
17 claims that ACCESS' service will be completely unavailable after a date certain.  
18 These activities are perhaps more subtle and insidious than the measurements  
19 typically associated with the competitive checklist of the Act. However, their  
20 impact on competition is obvious. Can BellSouth be said to comply with the  
21 requirement that it offers white page listings if it attempts to instill fear in  
22 ACCESS' customers that those listings will be unavailable? Can BellSouth be  
23 said to offer interconnection and access to a competitor on just and reasonable

1 terms if it tells (falsely) its competitors' customers that they will soon have no  
2 telephone service?

3 As Vice President for Marketing, I have gained personal knowledge that  
4 the instances are numerous and widespread. We have been able to document  
5 some of them through affidavits of customers. I have appended several such  
6 affidavits to my testimony as Exhibit No. \_\_\_\_\_ (RP-1), pgs.1-23. While most  
7 of these particular customers are located in Georgia, one of the affidavits was  
8 prepared by a customer in Florida. However, many customers are reluctant to  
9 provide such documentation because of their concern that their telephone service  
10 will suffer in some way as a consequence. We find that the problems detailed  
11 here are representative of those that occur throughout BellSouth's service area.

12 **Q. Please describe some of the specific encounters.**

13 A. In his affidavit (Exhibit No. \_\_\_ (RP-1), p. 1 of 23), Charles Vance states  
14 unequivocally that BellSouth threatened to refuse to maintain the service on his  
15 business' telephone line(s), and to delete his company from the yellow pages if  
16 he switched his local telephone service to ACCESS.

17 As the bookkeeper for Carpet Connection, Cathy Sparks (Exhibit No. \_\_\_  
18 (RP-1), pgs. 2 and 3 of 23), is charged with handling the company's telephone  
19 service issues. After discovering that the company had been deleted from the  
20 directory assistance, Ms. Sparks contacted BellSouth to inquire about the  
21 problem. Instead of correctly explaining the circumstances to her, the BellSouth  
22 employee told her that the company was no longer listed in directory assistance  
23 due to an error on ACCESS' part, not BellSouth's, and that in the future Carpet

1 Connection would not be listed there unless it returned to BellSouth as a  
2 customer.

3 Michael McDevitt's affidavit (Exhibit No. \_\_\_\_ (RP-1), p. 4 of 23) and  
4 Susan Kennedy's affidavit (Exhibit No. \_\_\_\_ (RP-1), p. 5 of 23), demonstrate the  
5 influence that an incumbent LEC like BellSouth can have in dealing with its  
6 former customers. In the case of McDevitt Air, BellSouth misrepresented the  
7 process that the company would have to go through to obtain DSL service so that  
8 McDevitt would transfer all of the company's telephone lines back to BellSouth's  
9 retail division.

10 Carol Duffey's affidavit (Exhibit No. \_\_\_\_ (RP-1), pgs. 6 and 7 of 23) is  
11 indicative of two realities for ALECs. First, BellSouth has no interest in giving  
12 ALECs the ability to interconnect with its facilities in a manner that will allow  
13 a company like ACCESS to become an effective competitor. Second, when  
14 ALECs are unable to obtain access that is "equal" to an incumbent's facilities,  
15 and thus cannot provide the same degree of quality customer service as  
16 BellSouth, their customers will inevitably return their telephone service to  
17 BellSouth.

18 The affidavits of Carol Roberts (Exhibit No. \_\_\_\_ (RP-1), pgs. 8-11 of 23),  
19 Mary Parker (Exhibit No. \_\_\_\_ (RP-1), pgs. 12-15 of 23), and Raymond Parker  
20 (Exhibit No. \_\_\_\_ (RP-1), pgs. 16-19 of 23), all of whom are associated with  
21 Parker & Bramlett Memorials, describe BellSouth's blunt message that  
22 customers who leave BellSouth will receive inferior maintenance service.

23 The affidavits of Daniel Becton (Exhibit No. \_\_\_\_ (RP-1), pgs. 20 and 21

1 of 23) and Jimmie Smith (Exhibit No. \_\_ (RP-1), pgs. 22 and 23 of 23),  
2 demonstrate outrageous conduct. TelChoice, acting as an agent of BellSouth,  
3 contacted ACCESS's customers to induce them to return to BellSouth. The agent  
4 informed them that their respective businesses would lose their telephone service  
5 after a certain date. In one instance, the customer was told that ACCESS had, or  
6 was about to, file for bankruptcy relief. None of these statements are true.

7 **Q. Please summarize your testimony.**

8 A. To assess whether BellSouth has complied with its obligation to open its network  
9 to competition, it is necessary to look at the bigger picture as well as its  
10 component parts. BellSouth's practice is to diminish, through its actions in the  
11 marketplace, the opportunity of ACCESS to compete that the provisions of the  
12 1996 Act were intended to afford. The Commission should conclude that  
13 BellSouth has not complied with its legal obligations and should not be allowed  
14 to enter the interLATA market.

15 **Q. Does this conclude your testimony?**

16 A. Yes.

AFFIDAVIT

STATE OF GEORGIA  
DEKALB COUNTY

Personally appeared before me an officer duly authorized to administer oaths, CHARLES VANCE, who after being duly sworn deposes and says that he is the owner of FURNITURE RESTORATION, INC. OF ATLANTA located at 3660 North Peachtree Road, Chamblee, Georgia 30341, and that in late July or early August of the year 2000, I contacted BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") to inquire about the legitimacy of Competitive Local Exchange Companies (CLECs) after receiving a sales call from Dick Coons, an agent with ACCESS INTEGRATED NETWORKS, INC. ("ACCESS"). I also wanted to verify certain details of the telephone service proposal made to me by Mr. Coons.

During my telephone conversation with a BELLSOUTH customer service representative, I was told that if my business switched its local telephone service to ACCESS the following would occur: (1) my business would not receive any service maintenance, and (2) my company would lose its yellow page listing at the end of the year (i.e. 2000). I was subsequently contacted by BELLSOUTH and asked about the incident recited above. I informed BELLSOUTH's representative(s) of everything contained in this Affidavit. My business still has its local (business) telephone service with BellSouth.

Charles Vance  
CHARLES VANCE, AFFIANT

Sworn to and subscribed before me  
this 25 day of May, 2001

Jose Muniz  
Notary Public





STATE OF ALABAMA  
*Morgan* COUNTY

Personally appeared before me an officer duly authorized to administer oaths, CATHY SPARKS, who after being duly sworn deposes and says that she is the *Bookkeeper* of THE CARPET CONNECTION located at 2713 Spring Place, Unit T, Decatur, Alabama, and that on or about September 19, 2000, she contacted Patty Anderson, an agent with ACCESS INTEGRATED NETWORKS, INC. ("ACCESS"), CARPET CONNECTION'S local phone service provider, and informed her that CARPET CONNECTION was no longer listed in directory assistance.

Ms. Sparks learned that CARPET CONNECTION had been deleted from directory assistance when she was contacted by a frustrated customer trying to reach her about a business matter. After this conversation, she verified the accuracy of the customer's statement by calling directory assistance, and requesting CARPET CONNECTION'S telephone number—only to be informed that CARPET CONNECTION was not listed.


Prior to contacting Patty Anderson, Ms. Sparks called BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") to inquire as to why CARPET CONNECTION had been deleted from directory assistance. She spoke with BELLSOUTH representative, Gwen Wilson. Ms. Wilson informed her that CARPET CONNECTION was no longer listed in directory assistance due to an error on ACCESS' part. Ms. Wilson also informed her that because CARPET CONNECTION was no longer a customer of BELLSOUTH, CARPET CONNECTION would no longer be listed in directory assistance. Ms. Wilson even placed Ms. Sparks on hold to confirm this "fact" with her supervisor.

Upon hearing this information, Ms. Sparks became infuriated with ACCESS, and, after her conversation with Ms. Wilson she then contacted Patty Anderson to discuss the representations that Ms. Anderson had made to her when the two had initially discussed the possibility of CARPET CONNECTION switching its local (business) telephone service from BELLSOUTH to ACCESS. Ms. Sparks informed Ms. Anderson that because of Ms. Wilson's statements she felt as though Ms. Anderson had misrepresented the quality of the telephone services that ACCESS could provide to CARPET CONNECTION..

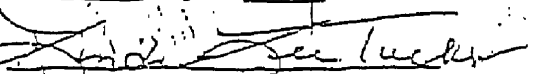
An ACCESS customer service representative subsequently informed Ms. Sparks that ACCESS had conducted an internal investigation, and discovered that the conversion order it had placed on CARPET CONNECTION'S behalf included the same directory listing that the company had as a customer of BELLSOUTH. Brandee Johnson, an Access customer service representative, telephoned Ms. Sparks and assured her that CARPET CONNECTION would be included in directory assistance. Ms. Johnson also informed Ms. Sparks that she would handle the matter personally. Ms. Sparks informed Ms. Johnson that while she enjoyed working with ACCESS, if the matter was not resolved by the end of business the next working day (i.e. September 20, 2000) CARPET CONNECTION would have no choice but to switch its local (business) phone service back to BELLSOUTH. Ms. Johnson made the necessary calls, and confirmed for Ms. Sparks on September 20, 2000 that CARPET CONNECTION was once again listed in directory assistance.

Shortly after the "directory assistance" incident, CARPET CONNECTION'S telephone service was disconnected. Once again, Ms. Sparks contacted Patty Anderson and asked her to look into the matter. She also contacted BELLSOUTH, but the representative that she spoke with informed her that it was not BELLSOUTH'S problem. The company's service was eventually restored as a result of ACCESS's efforts.

Finally, on February 13, 2001, Ms. Sparks was contacted by a BELLSOUTH representative about switching CARPET CONNECTION'S telephone service back to BELLSOUTH. She informed this person that CARPET CONNECTION was pleased with the level of service provided by ACCESS. The BELLSOUTH representative then informed Ms. Sparks that ACCESS was simply making money off of BELLSOUTH'S services, and that there was not point in the company using ACCESS when BELLSOUTH could sell CARPET CONNECTION the same telephone services for much less. Ms. Sparks declined to switch CARPET CONNECTION'S local telephone service to BELLSOUTH, and the company is still a customer of ACCESS.

  
CATHY SPARKS, AFFIANT

Sworn to and subscribed before me  
this 30<sup>th</sup> day of May, 2001

  
Notary Public (AKA *[Handwritten Name]*)

AFFIDAVIT

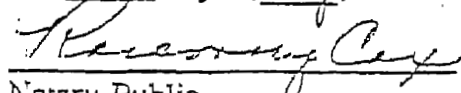
STATE OF GEORGIA  
CHATHAM COUNTY

Personally appeared before me an officer duly authorized to administer oaths, MICHAEL McDEVITT, who after being duly sworn deposes and says that: he is the President of MCDEVITT AIR ("MCDEVITT") located at 600 W. 51<sup>st</sup> Street, Savannah, Georgia 31405, and that in late February or early March of 2001, MCDEVITT switched from ACCESS INTEGRATED NETWORKS, INC. ("ACCESS") to BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") as the company's local telephone service provider as a result of statements made to either him or Susan Kennedy, Systems Administrator of MCDEVITT, by a BELLSOUTH representative. This BELLSOUTH representative stated unequivocally that unless MCDEVITT returned all eight of its telephone lines to BELLSOUTH it would be unable to get DSL service from BELLSOUTH. MCDEVITT transferred all eight of its telephone lines to BELLSOUTH from ACCESS as a direct result of this assertion by the BELLSOUTH representative.

Shortly after the aforementioned conversation took place, Ms. Kennedy received a telephone solicitation from a company called TELECHOICE, LLC ("TELECHOICE"). The TELECHOICE representative that Ms. Kennedy spoke with was Maegan Johnson. Ms. Johnson informed Ms. Kennedy that BellSouth was attempting to "win back" some its former customers, and that MCDEVITT could save a significant amount of money on its local telephone service bill if the company returned to BELLSOUTH. Ms. Kennedy informed me of her conversation with Ms. Johnson shortly after it took place. Although, MCDEVITT had already decided to switch its local telephone service back to BELLSOUTH in order to get DSL service, the company was able to get the BELLSOUTH "win back" rates as well.

  
MICHAEL McDEVITT AFFIANT

Sworn to and subscribed before me  
this 25<sup>th</sup> day of May, 2001

  
Notary Public

AFFIDAVIT

STATE OF GEORGIA  
CHATHAM COUNTY

Personally appeared before me an officer duly authorized to administer oaths, SUSAN KENNEDY, who after being duly sworn deposes and says the following: that she is the Systems Administrator for MCDEVITT AIR ("MCDEVITT") located at 600 W. 51<sup>st</sup> Street, Savannah, Georgia 31405, and that in late February or early March of 2001, MCDEVITT switched from ACCESS INTEGRATED NETWORKS, INC. ("ACCESS") to BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") as the company's local telephone service provider as a result of statements made to either her or Michael McDevitt, President of MCDEVITT, by a BELLSOUTH representative. This BELLSOUTH representative stated unequivocally that unless MCDEVITT returned all eight of its telephone lines to BELLSOUTH it would be unable to get DSL service from BELLSOUTH. MCDEVITT transferred all eight of its telephone lines to BELLSOUTH from ACCESS as a direct result of this assertion by the BELLSOUTH representative.

Shortly after the aforementioned conversation took place, Ms. Kennedy received a telephone solicitation from a company called TELECHOICE, LLC ("TELECHOICE"). The TELECHOICE representative that she spoke with was Maegan Johnson. Ms. Johnson informed her that BellSouth was attempting to "win back" some its former customers, and that MCDEVITT could save a significant amount of money on its local telephone service bill if the company returned to BELLSOUTH. Although, MCDEVITT had already decided to switch its local telephone service back to BELLSOUTH in order to get DSL service, the company was able to get the "win back" rates as well.

Susan Kennedy  
SUSAN KENNEDY, AFFIANT

Sworn to and subscribed before me  
this 27<sup>th</sup> day of May 2001

Rosemary Caff  
Notary Public

AFFIDAVIT

STATE OF GEORGIA  
BIBB COUNTY

Personally appeared before me an officer duly authorized to administer oaths, CAROL DUFFEY, who after being duly sworn deposes and says that she is a customer service representative with ACCESS INTEGRATED NETWORKS, INC. ("ACCESS"), and that on or about November 22, 2000, ACCESS sent an order to BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") requesting that approximately six (6) telephone lines be transferred from one premises to another on behalf of customer, IMMCO, INC. ("IMMCO"). My contact with IMMCO was a gentleman by the name of Dr. Rameesh.

On December 1, 2000, Dr. Rameesh called ACCESS back and modified IMMCO's order to request that the first two phone lines end with the numbers -8835 and -8845. ACCESS sent a new order that same day, and BELLSOUTH gave ACCESS a due date of December 14, 2000 with respect to same.

The December 1, 2000 order was delayed because BELLSOUTH claimed that the requested numbers (i.e. 678-762-8835 and 8845) were not available. I called these numbers, and each phone number played a message indicating that they had been disconnected or were temporarily out of service. A BELLSOUTH representative named Sarah told me that these numbers did not appear to be available, but that she would check to verify that this was indeed the case.

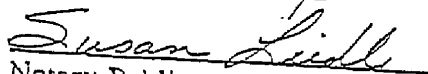
On December 15, 2000, a different BELLSOUTH representative (named Melody) left a message on my voice mail informing me that while 678-762-8835 and 8845 were not available, 678-772-8835 and 8845 appeared to be. Melody went on to state, however, that the due date for IMMCO's order would now be December 22, 2000. I requested that BELLSOUTH attempt to expedite the matter, and find telephone numbers for our customer ending in -8835 and -8845 immediately.

On December 18, 2000, Melody called me back and informed me that the due date could not be moved up at all, and that after exhausting all possibilities there were no numbers available ending in -8835 and -8845.

BELLSOUTH eventually did agree to move up the due date from December 22, 2000 to December 19, 2000, but still maintained that telephone numbers ending in -8835 and -8845 were not available for this customer. I contacted Dr. Rameesh on or about December 18, 2000, to inform him of this situation, and he advised me that he had taken IMMCO's business back to BELLSOUTH. Dr. Rameesh stated that BELLSOUTH was coming to his business that morning, and that IMMCO would be receiving the original numbers that he had requested (i.e. 678-762-8835 and 8845) from ACCESS. Dr. Rameesh also informed me that BELLSOUTH told him that it could not find any evidence in its system that ACCESS had ever placed an order on IMMCO's behalf.

  
CAROL DUFFEY, AFFIANT

Sworn to and subscribed before me  
this 24 day of May, 2001



Notary Public

MY COMMISSION EXPIRES DEC. 28, 2002

AFFIDAVIT

STATE OF GEORGIA  
Douglas COUNTY

Personally appeared before me an officer duly authorized to administer oaths, CAROL ROBERTS, who after being duly sworn deposes and says that she is the office manager of PARKER & BRAMLETT CUSTOM MEMORIALS ("PARKER") located at 1568 U.S. Hwy 19 South, Leesburg, Georgia 31763, Georgia, and hereby attests to the following:

That in February of 2001 PARKER ordered two telephone jacks from BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH"). At the time of the order, PARKER used ACCESS INTEGRATED NETWORKS, INC. ("ACCESS") as its local telephone service provider.

On March 1, 2001, Raymond Parker called an ACCESS customer service representative to report problems with PARKER'S telephone service. The problem stemmed from two telephone lines that were running through a telephone jack installed by BELLSOUTH. ACCESS was able to establish a dial tone, but the two telephone lines continued to run through this one telephone jack.

On April 8, 2001, Raymond Parker contacted ACCESS again about "buzzing" and "humming" noises that were coming from the aforementioned telephone lines. Mr. Parker also informed ACCESS that "call waiting" was not working as well.

On April 9, 2001, David Lowrey, an ACCESS representative, called PARKER and spoke with Mary Parker, Mr. Parker's wife and a part time bookkeeper for PARKER. Mr. Lowrey informed Mrs. Parker that a BELLSOUTH technician would be at PARKER'S Albany, Georgia office (hereinafter the "Office") by 1:00 p.m. that day. Greg, BELLSOUTH technician identification number PNHWFYF (hereinafter "BELLSOUTH Technician Greg"), called PARKER and confirmed to Carol Roberts, PARKER'S officer manager, that he would be at PARKER'S Office by 1:00p.m. Mrs. Roberts waited for BELLSOUTH Technician Greg to arrive, but she eventually had to leave the office at 3:15 p.m. to meet with prospective clients. At the time Mrs. Roberts left, she had not received a telephone call from BELLSOUTH Technician Greg to advise her that he would be running late.

Mrs. Parker arrived at the office at 3:45 p.m., and witnessed BELLSOUTH Technician Greg leaving the premises. Mrs. Parker was unable to get the technician's attention, but did find a note with his pager number. She immediately paged him. At 3:50 p.m., Mr. Parker, now back in the Office, received a telephone call from BELLSOUTH Technician Greg.

BELLSOUTH Technician Greg informed Mr. Parker that he was already on another job, and that he would not be able to return to address the service problem that day. Having already waited two weeks for BELLSOUTH to dispatch a technician to resolve this problem, Mr. Parker demanded that BELLSOUTH Technician Greg return to PARKER's Office to fix the aforementioned telephone problem(s). BELLSOUTH Technician Greg told Mr. Parker that he would "not tell him what to do," and that because PARKER now used ACCESS as its local telephone service provider he did not have to come back at all. Mr. Parker informed BELLSOUTH Technician Greg that he would contact his supervisor. BELLSOUTH Technician Greg told Mr. Parker that he could do whatever he wanted to do. Mr. Parker then stated that had he been at PARKER at, or even near, the appointed time, someone from PARKER would have been there to let him in. Mr. Parker then told BELLSOUTH Technician Greg that he was not to come back to PARKER'S Office. After this conversation took place, Mr. Parker called ACCESS to report what had happened.

On April 10, 2001, another BELLSOUTH technician named Mike, BELLSOUTH technician identification number BWKIGGB (hereinafter "BELLSOUTH Technician Mike"), arrived at PARKER's Office at approximately 8:55 a.m. BELLSOUTH Technician Greg arrived in his personal red pickup truck, and parked at an adjacent property for approximately 20 minutes. Mrs. Roberts witnessed both technician's arrival, but is unsure as to whether the two had contact while BELLSOUTH Technician Mike "worked" on PARKER's telephone problems. BELLSOUTH Technician Mike confirmed to Mrs. Roberts that BELLSOUTH Technician Greg was indeed sitting in his personal truck on a property adjacent from PARKER's Office. BELLSOUTH Technician Mike checked the outside box, and informed Ms. Roberts that he was not coming inside to perform any work due to the fact that PARKER had switched its local telephone service to ACCESS. Ms. Roberts immediately called David Lowrey with ACCESS to advise him of this statement. Mr. Lowrey asked to speak with the BELLSOUTH Technician Mike. Mr. Lowrey requested that the technician go inside the premises, and fix that jack that BELLSOUTH had originally installed. BELLSOUTH Technician Mike fixed the jacks, and then used the telephone to make numerous telephone calls.

After BELLSOUTH Technician Mike finished making his telephone calls, he informed Ms. Roberts that he was going to change the "memory card" outside the building and then change it on the BELLSOUTH's end as well. After spending some time outside the PARKER Office building, BELLSOUTH Technician Mike left the premises.



After BELLSOUTH Technician Mike's departure, Ms. Roberts did not receive any telephone calls at the PARKER Office. Mrs. Parker attempted to call the Office later that morning, and when she did the person on the other end of the telephone answered "Hall Funeral Home and Monument Company," a direct competitor of PARKER'S. Ms. Parker thought that perhaps she had dialed the wrong number, and therefore tried dialing PARKER'S Office telephone number again. Once again, the person at the other end of the telephone answered "Hall Funeral Home and Monument Company."

Mr. Parker also attempted to call PARKER'S Office, and the same thing occurred. One of PARKER'S vendors, Allgood Granite Company, attempted to call PARKER'S Office as well only to have its call forwarded to Hall Funeral Home and Monument Company.

Mrs. Parker then called a neighboring business, Ferrell Gas, and asked one of its employees to go over to the PARKER Office and tell Ms. Roberts to call PARKER'S Camilla office. Ms. Roberts called Mrs. Parker as instructed, and Mrs. Parker explained to her that PARKER'S incoming telephone calls were being forwarded to the aforementioned competitor.

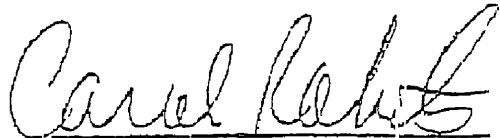
Given the events noted above (with respect to BELLSOUTH Technicians Greg and Mike), Mr. Parker, Mrs. Parker, and Ms. Roberts suspected that at least one of the BELLSOUTH technicians (i.e. Mike) had done something to cause PARKER'S incoming telephone calls to be forwarded to its direct competitor, Hall Funeral Home and Monument Company.

Mr. Parker called ACCESS and spoke with David Lowrey and Brent Tate, and informed them that PARKER'S incoming telephone calls were being forwarded to a direct competitor. These ACCESS customer service representatives advised Mrs. Parker and Ms. Roberts that he should go to PARKER'S Office, pick up the telephone, and dial 73 and then the "pound" symbol to stop the call forwarding from occurring. Ms. Roberts did as instructed, and PARKER'S incoming telephone calls were no longer forwarded to Hall Funeral Home and Monument Company.

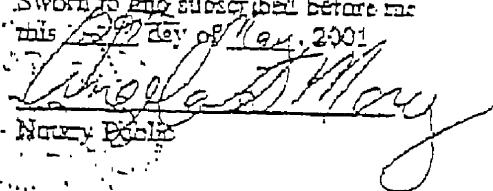
On April 11, 2001, Mr. Parker telephoned BELLSOUTH and spoke with customer service representatives Kim Osbourne and Randy Darnell. These BELLSOUTH representatives told Mr. Parker that it was against the law for them to tell him the name of the supervisors of the aforementioned BELLSOUTH technicians. Ms. Osbourne also told Mr. Parker that because PARKER had switched its local telephone service to ACCESS, BELLSOUTH was no longer responsible for the actions of its own technicians. Mr. Parker asked to speak to Ms. Osbourne's supervisor, but she refused his request. Mr. Parker then spoke with Mr. Darnell.

13:25 01 TUE 18:11 -23

Mr. Darnell also informed Mr. Parker that it was against the law for him to disclose the names of his superiors for the South Georgia area, due to the fact that PARKER now had its local telephone service with ACCESS. Mr. Parker informed Mr. Darnell that he was going to contact the Georgia Public Service Commission about what had taken place with BELLSOUTH's technicians, and asked him whether he still wished to refuse to allow him to speak with the technicians' supervisors. At this point, Mr. Darnell became very snide with Mr. Parker, and told him that he could do whatever he wanted to do, but that he would not give him any of the information that he had requested. Mr. Parker then hung up the telephone.



CAROL ROBERTS, AFFIANT

Sworn to and subscribed before me  
this 27<sup>th</sup> day of May, 2001  
  
Nancy D. Hays  
My COMMISSION EXPIRES MAY 2, 2004

AFFIDAVIT

STATE OF GEORGIA  
LeR COUNTY

Personally appeared before me an officer duly authorized to administer oaths, MARY PARKER, who after being duly sworn deposes and says that she is a part time bookkeeper for PARKER & BRAMLETT CUSTOM MEMORIALS ("PARKER") located at 1568 U.S. Hwy 19 South, Leesburg, Georgia 31763, Georgia, and hereby attests to the following:

That in February of 2001 PARKER ordered two telephone jacks from BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH"). At the time of the order, PARKER used ACCESS INTEGRATED NETWORKS, INC. ("ACCESS") as its local telephone service provider.

On March 1, 2001, Raymond Parker called an ACCESS customer service representative to report problems with PARKER'S telephone service. The problem stemmed from two telephone lines that were running through a telephone jack installed by BELLSOUTH. ACCESS was able to establish a dial tone, but the two telephone lines continued to run through this one telephone jack.

On April 8, 2001, Raymond Parker contacted ACCESS again about "buzzing" and "humming" noises that were coming from the aforementioned telephone lines. Mr. Parker also informed ACCESS that "call waiting" was not working as well.

On April 9, 2001, David Lowrey, an ACCESS representative, called PARKER and spoke with Mary Parker, Mr. Parker's wife and a part time bookkeeper for PARKER. Mr. Lowrey informed Mrs. Parker that a BELLSOUTH technician would be at PARKER'S Albany, Georgia office (hereinafter the "Office") by 1:00 p.m. that day. Greg, BELLSOUTH technician identification number PNHWFYF (hereinafter "BELLSOUTH Technician Greg"), called PARKER and confirmed to Carol Roberts, PARKER'S officer manager, that he would be at PARKER'S Office by 1:00p.m. Mrs. Roberts waited for BELLSOUTH Technician Greg to arrive, but she eventually had to leave the office at 3:15 p.m. to meet with prospective clients. At the time Mrs. Roberts left, she had not received a telephone call from BELLSOUTH Technician Greg to advise her that he would be running late.

Mrs. Parker arrived at the office at 3:45 p.m., and witnessed BELLSOUTH Technician Greg leaving the premises. Mrs. Parker was unable to get the technician's attention, but did find a note with his pager number. She immediately paged him. At 3:50 p.m., Mr. Parker, now back in the Office, received a telephone call from BELLSOUTH Technician Greg.

BELLSOUTH Technician Greg informed Mr. Parker that he was already on another job, and that he would not be able to return to address the service problem that day. Having already waited two weeks for BELLSOUTH to dispatch a technician to resolve this problem, Mr. Parker demanded that BELLSOUTH Technician Greg return to PARKER's Office to fix the aforementioned telephone problem(s). BELLSOUTH Technician Greg told Mr. Parker that he would "not tell him what to do," and that because PARKER now used ACCESS as its local telephone service provider he did not have to come back at all. Mr. Parker informed BELLSOUTH Technician Greg that he would contact his supervisor. BELLSOUTH Technician Greg told Mr. Parker that he could do whatever he wanted to do. Mr. Parker then stated that had he been at PARKER at, or even near, the appointed time, someone from PARKER would have been there to let him in. Mr. Parker then told BELLSOUTH Technician Greg that he was not to come back to PARKER'S Office. After this conversation took place, Mr. Parker called ACCESS to report what had happened.

On April 10, 2001, another BELLSOUTH technician named Mike, BELLSOUTH technician identification number BWKIGGB (hereinafter "BELLSOUTH Technician Mike"), arrived at PARKER's Office at approximately 8:55 a.m. BELLSOUTH Technician Greg arrived in his personal red pickup truck, and parked at an adjacent property for approximately 20 minutes. Mrs. Roberts witnessed both technician's arrival, but is unsure as to whether the two had contact while BELLSOUTH Technician Mike "worked" on PARKER's telephone problems. BELLSOUTH Technician Mike confirmed to Mrs. Roberts that BELLSOUTH Technician Greg was indeed sitting in his personal truck on a property adjacent from PARKER's Office. BELLSOUTH Technician Mike checked the outside box, and informed Ms. Roberts that he was not coming inside to perform any work due to the fact that PARKER had switched its local telephone service to ACCESS. Ms. Roberts immediately called David Lowrey with ACCESS to advise him of this statement. Mr. Lowrey asked to speak with the BELLSOUTH Technician Mike. Mr. Lowrey requested that the technician go inside the premises, and fix that jack that BELLSOUTH had originally installed. BELLSOUTH Technician Mike fixed the jacks, and then used the telephone to make numerous telephone calls.

After BELLSOUTH Technician Mike finished making his telephone calls, he informed Ms. Roberts that he was going to change the "memory card" outside the building and then change it on the BELLSOUTH's end as well. After spending some time outside the PARKER Office building, BELLSOUTH Technician Mike left the premises.

After BELLSOUTH Technician Mike's departure, Ms. Roberts did not receive any telephone calls at the PARKER Office. Mrs. Parker attempted to call the Office later that morning, and when she did the person on the other end of the telephone answered "Hall Funeral Home and Monument Company," a direct competitor of PARKER'S. Ms. Parker thought that perhaps she had dialed the wrong number, and therefore tried dialing PARKER'S Office telephone number again. Once again, the person at the other end of the telephone answered "Hall Funeral Home and Monument Company."

Mr. Parker also attempted to call PARKER'S Office, and the same thing occurred. One of PARKER'S vendors, Allgood Granite Company, attempted to call PARKER'S Office as well only to have its call forwarded to Hall Funeral Home and Monument Company.

Mrs. Parker then called a neighboring business, Ferrell Gas, and asked one of its employees to go over to the PARKER Office and tell Ms. Roberts to call PARKER's Camilla office. Ms. Roberts called Mrs. Parker as instructed, and Mrs. Parker explained to her that PARKER'S incoming telephone calls were being forwarded to the aforementioned competitor.

Given the events noted above (with respect to BELLSOUTH Technicians Greg and Mike), Mr. Parker, Mrs. Parker, and Ms. Roberts suspected that at least one of the BELLSOUTH technicians (i.e. Mike) had done something to cause PARKER's incoming telephone calls to be forwarded to its direct competitor, Hall Funeral Home and Monument Company.

Mr. Parker called ACCESS and spoke with David Lowrey and Brent Tate, and informed them that PARKER's incoming telephone calls were being forwarded to a direct competitor. These ACCESS customer service representatives advised Mrs. Parker and Ms. Roberts that he should go to PARKER'S Office, pick up the telephone, and dial 73 and then the "pound" symbol to stop the call forwarding from occurring. Ms. Roberts did as instructed, and PARKER'S incoming telephone calls were no longer forwarded to Hall Funeral Home and Monument Company.

On April 11, 2001, Mr. Parker telephoned BELLSOUTH and spoke with customer service representatives Kim Osbourne and Randy Darnell. These BELLSOUTH representatives told Mr. Parker that it was against the law for them to tell him the name of the supervisors of the aforementioned BELLSOUTH technicians. Ms. Osbourne also told Mr. Parker that because PARKER had switched its local telephone service to ACCESS, BELLSOUTH was no longer responsible for the actions of its own technicians. Mr. Parker asked to speak to Ms. Osbourne's supervisor, but she refused his request. Mr. Parker then spoke with Mr. Darnell.

Mr. Darnell also informed Mr. Parker that it was against the law for him to disclose the names of his superiors for the South Georgia area, due to the fact that PARKER now had its local telephone service with ACCESS. Mr. Parker informed Mr. Darnell that he was going to contact the Georgia Public Service Commission about what had taken place with BELLSOUTH's technicians, and asked him whether he still wished to refuse to allow him to speak with the technicians' supervisors. At this point, Mr. Darnell became very snide with Mr. Parker, and told him that he could do whatever he wanted to do, but that he would not give him any of the information that he had requested. Mr. Parker then hung up the telephone.

Mary Parker  
MARY PARKER, AFFIANT

Sworn to and subscribed before me  
this 30 day of MAY, 2001

Jess Bay  
Notary Public

MY COMMISSION EXPIRES  
AT THE CLERK'S PLEASURE.

AFFIDAVIT

STATE OF GEORGIA  
Lee COUNTY

Personally appeared before me an officer duly authorized to administer oaths, RAYMOND PARKER, who after being duly sworn deposes and says that he is the owner of PARKER & BRAMLETT CUSTOM MEMORIALS ("PARKER") located at 1568 U.S. Hwy 19 South, Leesburg, Georgia 31763, Georgia, and hereby attests to the following:

That in February of 2001 PARKER ordered two telephone jacks from BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH"). At the time of the order, PARKER used ACCESS INTEGRATED NETWORKS, INC. ("ACCESS") as its local telephone service provider.

On March 1, 2001, Raymond Parker called an ACCESS customer service representative to report problems with PARKER'S telephone service. The problem stemmed from two telephone lines that were running through a telephone jack installed by BELLSOUTH. ACCESS was able to establish a dial tone, but the two telephone lines continued to run through this one telephone jack.

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BELLSOUTH Technician Greg informed Mr. Parker that he was already on another job, and that he would not be able to return to address the service problem that day. Having already waited two weeks for BELLSOUTH to dispatch a technician to resolve this problem, Mr. Parker demanded that BELLSOUTH Technician Greg return to PARKER's Office to fix the aforementioned telephone problem(s). BELLSOUTH Technician Greg told Mr. Parker that he would "not tell him what to do," and that because PARKER now used ACCESS as its local telephone service provider he did not have to come back at all. Mr. Parker informed BELLSOUTH Technician Greg that he would contact his supervisor. BELLSOUTH Technician Greg told Mr. Parker that he could do whatever he wanted to do. Mr. Parker then stated that had he been at PARKER at, or even near, the appointed time, someone from PARKER would have been there to let him in. Mr. Parker then told BELLSOUTH Technician Greg that he was not to come back to PARKER'S Office. After this conversation took place, Mr. Parker called ACCESS to report what had happened.

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Given the events noted above (with respect to BELLSOUTH Technicians Greg and Mike), Mr. Parker, Mrs. Parker, and Ms. Roberts suspected that at least one of the BELLSOUTH technicians (i.e. Mike) had done something to cause PARKER's incoming telephone calls to be forwarded to its direct competitor, Hall Funeral Home and Monument Company.

Mr. Parker called ACCESS and spoke with David Lowrey and Brent Tate, and informed them that PARKER's incoming telephone calls were being forwarded to a direct competitor. These ACCESS customer service representatives advised Mrs. Parker and Ms. Roberts that he should go to PARKER'S Office, pick up the telephone, and dial 73 and then the "pound" symbol to stop the call forwarding from occurring. Ms. Roberts did as instructed, and PARKER'S incoming telephone calls were no longer forwarded to Hall Funeral Home and Monument Company.

On April 11, 2001, Mr. Parker telephoned BELLSOUTH and spoke with customer service representatives Kim Osbourne and Randy Darnell. These BELLSOUTH representatives told Mr. Parker that it was against the law for them to tell him the name of the supervisors of the aforementioned BELLSOUTH technicians. Ms. Osbourne also told Mr. Parker that because PARKER had switched its local telephone service to ACCESS, BELLSOUTH was no longer responsible for the actions of its own technicians. Mr. Parker asked to speak to Ms. Osbourne's supervisor, but she refused his request. Mr. Parker then spoke with Mr. Darnell.

Mr. Darnell also informed Mr. Parker that it was against the law for him to disclose the names of his superiors for the South Georgia area, due to the fact that PARKER now had its local telephone service with ACCESS. Mr. Parker informed Mr. Darnell that he was going to contact the Georgia Public Service Commission about what had taken place with BELLSOUTH's technicians, and asked him whether he still wished to refuse to allow him to speak with the technicians' supervisors. At this point, Mr. Darnell became very snide with Mr. Parker, and told him that he could do whatever he wanted to do, but that he would not give him any of the information that he had requested. Mr. Parker then hung up the telephone.

Raymond Parker  
RAYMOND PARKER, AFFIANT

Sworn to and subscribed before me  
this 29 day of may, 2001

Mary D. Parker  
Notary Public

My Commission Expires April 19, 2002.

AFFIDAVIT OF DANIEL BECTON

STATE OF FLORIDA        )  
                                  )  
COUNTY OF DUVAL        )


Before me, the undersigned Notary Public in and for said county and said state, appeared DANIEL BECTON, who after being duly sworn, deposed and stated as follows:

1. My name is Daniel Becton. I am over 21 years of age and I am competent to make the statements contained in this affidavit based upon my personal knowledge.
2. I am the President of Planogramming Solutions, Inc. in Jacksonville, Florida. I am responsible for contracting for Planogramming's telephone service.
3. Planogramming currently has a contract with Access Integrated Networks, Inc. ("Access"), pursuant to which Access provides Planogramming with telephone service. Planogramming has used Access telephone service since May 2000. I have been satisfied with the telephone service Planogramming has received from Access.
4. On or about April 23, 2001, I was contacted by James Presson. Mr. Presson did not identify himself as being affiliated with TelChoice or any other telemarketing firm, although I had received previous solicitation calls from Mr. Presson during which he referred to himself as a BellSouth representative. He suggested that Planogramming should switch back to the "original" services of BellSouth so that I could feel more certain regarding our telephone service.
5. Mr. Presson advised me that Planogramming would lose its telephone service with Access after April 30, 2001. Mr. Presson said he knew this would happen because he was given an intercompany memo which stated that customers of Access Integrated would lose their telephone service on May 1, 2001.

6. I was surprised to hear that Planogramming's telephone service with Access would be interrupted. Planogramming's telephone service is a serious matter. I knew that if Planogramming lost its service the loss would negatively impact Planogramming's business.

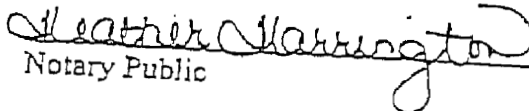
7. I did not authorize the BellSouth representative that contacted me, nor any other BellSouth representative, to switch Planogramming's telephone service from Access to BellSouth or any other company.

Further Affiant sayeth not.

  
Daniel Becton

Sworn to and subscribed before me  
this the 9th day of May, 2001.



  
Notary Public

My commission expires: September 26, 2003

AFFIDAVIT OF JIMMIE SMITH

STATE OF GEORGIA     )  
                                  )  
COUNTY OF COBB     )

Before me, the undersigned Notary Public in and for said county and said state, appeared JIMMIE SMITH, who after being duly sworn, deposed and stated as follows:

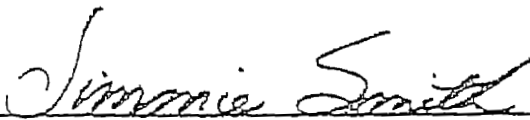
1. My name is Jimmie Smith. I am over 21 years of age and I am competent to make the statements contained in this affidavit based upon my personal knowledge.
2. I am the office administrator of DANA, Inc. f/k/a Napa Echlin National in Atlanta, Georgia. As DANA's office administrator, I am the individual responsible for contracting for DANA's telephone service.
3. DANA currently has a contract with Access Integrated Networks, Inc. ("Access"), pursuant to which Access provides telephone service for DANA. DANA has used Access telephone service for approximately two years and we have been satisfied with the service Access provides.
4. On April 24, 2001, a woman who identified herself as "Samantha Wright with BellSouth" called me at DANA. Ms. Wright never mentioned or otherwise indicated that she worked for TelChoice or any other telemarketing firm.
5. Ms. Wright asked me if I would considering switching DANA's telephone service from Access to BellSouth. I advised her that I was satisfied with Access's service, so I had no intention to switch DANA to BellSouth.
6. Ms. Wright stated that BellSouth employees were given an intercompany memo that morning stating that Access was going out of business on April 30, 2001.

7. I was surprised to hear that Access was having any financial difficulties and in particular that Access was going out of business at any time. I feared that if Access went out of business, DANA would lose its telephone service, which would negatively impact DANA's business. Furthermore, as the person responsible for selecting DANA's telephone service provider, I was concerned that I would be held responsible if the telephone service was interrupted.

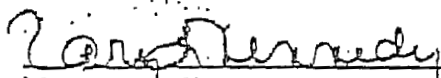
8. I advised Ms. Wright that if Access did go out of business, then DANA would consider switching its service to BellSouth. However, I advised Ms. Wright that if Access was not going out of business, DANA did not intend to switch its service.

9. I did not authorize the BellSouth representative who contacted me, nor any other BellSouth representative, to switch DANA's phone service from Access to BellSouth or any other company.

Further Affiant sayeth not.

  
\_\_\_\_\_  
Jimmie Smith

Sworn to and subscribed before me  
this the 9th day of May, 2001.

  
\_\_\_\_\_  
Notary Public

My commission expires: Notary Public, Henry County, Georgia  
My Commission Expires Oct. 8, 2002

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony and Exhibit of Rodney Page has been furnished by (\*) hand delivery or by U. S. Mail on this 20<sup>th</sup> day of July, 2001, to the following:

(\*) Beth Keating  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Jeremy Marcus  
Blumenfeld & Cohen  
1625 Massachusetts Avenue, NW  
Suite 300  
Washington DC 20036

Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, inc.  
150 South Monroe Street, Suite 400  
Miami Florida 32301

James Falvey  
e.spire Communications  
131 National Business Parkway, Suite 100  
Annapolis Junction, MD 20701

Michael Gross  
Florida Cable Telecommunications Assoc.  
246 E. 6th Avenue  
Tallahassee, Florida 32303

Kim Caswell  
GTE  
Post Office Box 110  
FLTC0007  
Tampa, Florida 33601

Richard Melson  
Post Office Box 6526  
Tallahassee, Florida 32314

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Donna McNulty  
325 John Knox Road, Suite 105  
Tallahassee, Florida 32303

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Messer Law Firm  
Post Office Box 1876  
Tallahassee, Florida 32302

Pete Dunbar/Karen Camechis  
Pennington Law Firm  
Post Office Box 10095  
Tallahassee, Florida 32301

Susan S. Masterton  
Sprint  
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MC: FLTLH00107  
Tallahassee, Florida 32316-2214

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Rutledge Law Firm  
Post Office Box 551  
Tallahassee, Florida 32302-0551

Andrew Isar  
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Gig Harbor, WA 98335

Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

Angela Green, General Counsel  
Florida Public Telecommunications Assoc  
125 S. Gadsden Street, Suite 200  
Tallahassee, Florida 32301-1525

Patrick Wiggins  
Katz, Kutter Law Firm, 12th Floor  
106 East College Avenue  
Tallahassee, Florida 32301

John Marks, III  
Knowles Law Firm  
215 S. Monroe Street, Suite 130  
Tallahassee, Florida 32301

Scheffel Wright  
Landers Law Firm  
Post Office Box 271  
Tallahassee, Florida 32302

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Suite 812  
Tallahassee, Florida 32399-1400

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Washington DC 20005-2004

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Atlanta, GA 30328-3495

John Kerkorian  
MPower  
5607 Glenridge Drive, Suite 300  
Atlanta, GA 30342

CWA (Orl)  
Kenneth Ruth  
2180 West State Road 434  
Longwood, FL 32779

ITC^ DeltaCom  
Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343

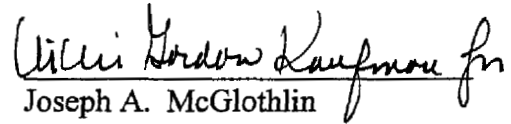
Network Access Solutions Corporation  
100 Carpenter Drive, Suite 206  
Sterling, VA 20164

Swidler & Berlin  
Richard Rindler/Michael Sloan  
3000 K. St. NW #300  
Washington, DC 20007-5116

Suzanne F. Summerlin  
IDS Telcom L.L.C.  
1311-B Paul Russell Road, Suite 201  
Tallahassee, Florida 32301



Jim Lamoureux  
AT&T Communications, Inc.  
1200 Peachtree Street, NE, Room 8068  
Atlanta, GA 30309



Joseph A. McGlothlin  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
Arnold & Steen, P.A.  
117 S. Gadsden  
Tallahassee, Florida 32301  
Telephone: (850) 222-2525  
Facsimile: (850) 222-5606  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)

Mark D. Baxter  
Stone & Baxter, LLP  
577 Mulberry Street, Suite 1111  
Macon, Georgia 31201-8256  
Telephone: (750) 750-9898  
Facsimile: (750) 750-9899  
[mbaxter@stoneandbaxter.com](mailto:mbaxter@stoneandbaxter.com)

Attorneys for ACCESS Integrated  
Networks, Inc.