

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency petition of AT&T)
Communications of the Southern States,)
LLC d/b/a AT&T d/b/a Lucky Dog Phone)
Co., d/b/a ACC Business d/b/a SmarTalk)
d/b/a Unispeaksm Service d/b/a AT&T)
for cease and desist order and other)
sanctions against Supra)
Telecommunications and Information)
Systems, Inc.)
_____)

Docket No. 030200-TP

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
RESPONSES TO FPSC STAFF'S FIRST SET OF INTERROGATORIES**

AT&T Communications of the Southern States, LLC ("AT&T"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby submit the following Responses to FPSC Staff's First Set of Interrogatories to AT&T.

INTERROGATORY NO. 1: Please provide a list of customers, including phone number and address, that AT&T believes were possible inappropriately converted from AT&T's toll or local toll service to Supra's toll or local toll service.

RESPONSE: The enclosed diskette contains the names, addresses and the telephone numbers of approximately 7700 persons that were AT&T long distance customers as of January 31, 2003, and which also had Supra as a local carrier. Each of these customers had their Primary Interexchange Carrier (PIC) changed from AT&T (out PIC'ed) during the time period from February 1, 2003 to March 10, 2003. This is the same time period during which Supra had sent the Disconnect notice letter (see, Attachment 1 to AT&T's Emergency Petition) to AT&T's customers instructing AT&T's customers that their long distance service would be disconnected and to find another long distance carrier or to switch to Supra and during the same time period when Supra's customer service representatives were given similar instructions on how to deal with customer inquiries (see,

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Attachment 3 to AT&T's Emergency Petition).

AT&T does not believe that the 7700 customers on the list represents the entirety of AT&T's customer base that have been impacted by Supra's extraordinary unlawful actions but only those AT&T customers that AT&T is aware of. Since Supra does not provide timely or consistent CARE (Customer Account Record Exchange) data which would confirm the "outPIC" activity, AT&T does not know the full impact of Supra's actions on AT&T's customers.

Further, AT&T does not know how much of this "outPIC" activity represents Supra placing AT&T's customers in a "noPIC" status nor how much of this activity represents "slamming" by Supra of AT&T's customers without their consent to Supra Long Distance services or other Interexchange carriers. To the extent Supra claims and has documentation of the customer's alleged "consent" during this time period, such consent would have been based on the misrepresentation and coercion evidenced by the mass mailing of the Disconnect Notice letter and the handling of AT&T customer calls by Supra customer service representatives.

As additional information becomes available, AT&T will supplement this discovery request.

NOTE: The files on the attached diskette contain the names, addresses and phone numbers of AT&T customers and former customer and are Proprietary and Confidential.

INTERROGATORY NO. 2: Please provide a list of customers, including phone number and address, that AT&T believes were possibly inappropriately converted from AT&T's toll or local toll service to a third party's toll or local toll service.

RESPONSE: See Response to Interrogatory 1.

INTERROGATORY NO. 3: Please provide a list of customers, including phone number and address, that AT&T believes were possibly inappropriately converted to a NO PIC.

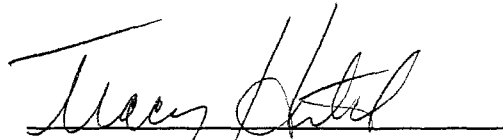
RESPONSE: See Response to Interrogatory 1.

INTERROGATORY NO. 4: Please provide a list of customers, including phone number and address, that contacted AT&T to complain or report that Supra allegedly denied the customer access to AT&T for toll and local toll services when the customer contacted Supra to obtain such service and wanted AT&T as the provider for said service.

RESPONSE: See the Attached documents.

NOTE: The attached documents responsive to Interrogatory No. contain the names, addresses and phone numbers of AT&T customers and former customer and are Proprietary and Confidential.

DATED this 19th day of March, 2003.



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