



Tracy Hatch
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December 9, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 030961-TI, 030867-TL, 030868-TL, and 030869-TL

Dear Ms. Bayó:

Enclosed for filing are an original and two copies of AT&T's Notice of Serving Supplemental Responses to Staff's Second Set of Interrogatories filed on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. in the above referenced Dockets.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Sapper in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

TWH/las
Enclosure
cc: Parties of Record

DOCUMENT NUMBER - DATE

12681 DEC-9 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local) Docket No. 030867-TL
Telecommunications rates in Accordance with)
Florida Statutes, Section 364.164)

In re: Petition of Sprint-Florida, Incorporated,)
To reduce intrastate switched network) Docket No. 030868-TL
Access rates to interstate parity in)
Revenue neutral manner pursuant to)
Section 364.164(1), Florida Statutes)

In re: Petition by BellSouth)
Telecommunications, Inc.,) Docket No. 030869-TL
To Reduce Its Network Access Charges)
Applicable To Intrastate Long Distance In)
A Revenue-Neutral Manner)

In re: Flow-through of LEC Switched Access) Docket No. 030961-TI
Reductions by IXCs, Pursuant to Section)
364.163(2), Florida Statutes) Filed December 9, 2003

NOTICE OF SERVICE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S SUPPLEMENTAL RESPONSES TO STAFF SECOND SET OF INTERROGATORIES (NOS. 74-87)

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Supplemental Responses to Staff's Second Set of Interrogatories (Nos.74-87), which was legally propounded by Staff on November 25, 2003, was sent via electronic mail and hand delivery on December 9, 2003, to Beth Keating at bkeating@psc.state.fl.us and to the Staff Counsel, at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

The original and one copy of this Notice were also served on December 9, 2003 to the Director, Division of the Commission Clerk and Administrative Services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on December 9, 2003.

By: 

Tracy W. Hatch, Esq.

AT&T Communications of the Southern States, LLC

101 N. Monroe Street, Suite 700

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(850) 425-6360

Attorney for AT&T Communications of the Southern States, LLC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.	DOCKET NO. 030867-TL
In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.	DOCKET NO. 030868-TL
In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.	DOCKET NO. 030869-TL
In re: Flow-through of LEC switched access reductions by IXCs, pursuant to Section 364.163(2), Florida Statutes.	DOCKET NO. 030961-TI DECEMBER 9, 2003

AT&T'S SUPPLEMENTAL RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES TO (NOS. 74-87)

REDACTED VERSION

AT&T Communications of the Southern States, LLC ("hereinafter "AT&T"), pursuant to the Florida Public Service Commission's *Orders Establishing Procedure*, Order Nos. PSC-03-0994-PCO-TL and PSC-03-1269-PCO-TL, issued on September 4, 2003 and November 10, 2003, respectively, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, hereby provide its Supplemental Responses to Staff's Second Set of Interrogatories to AT&T Communications of the Southern States, LLC. served on November 25, 2003, as described below.

RESPONSES

74. What is your average revenue per customer in Florida for the following services:

- A. Basic local service
- B. Vertical features
- C. IntraLATA toll
- D. InterLATA toll (intrastate) toll
- E. Extended calling plans
- F. Average combined revenue (if not providing all services set forth in A-E above, please identify which are included in this number)

If you have not yet begun to offer or provide service in Florida, please provide your anticipated average revenue per customer for basic service and for total service (excluding interstate long distance).

SPECIFIC OBJECTION/RESPONSE: The information sought in this interrogatory is not relevant to any issue, not reasonably calculated to lead to the discovery of admissible evidence, and seeks highly sensitive revenue and marketing information. AT&T objects to this interrogatory to the extent that it calls for speculation as to future services. AT&T objects to this interrogatory to the extent that it seeks potential service information that is highly proprietary marketing information that is privileged as a trade secret. Notwithstanding the objection, AT&T does not have this information in the format requested. However, in an attempt to be responsive, AT&T provides the following information:

AT&T currently offers a bundled "All in One" product for business customers. The average year-to-date revenue per customer is XXX BEGIN CONFIDENTIAL . END CONFIDENTIAL XXX Revenue data for residential customers is not available at this time due to the fact that AT&T has just begun to offer its residential UNE-P product.

75. What is your average revenue per residential customer in Florida for:

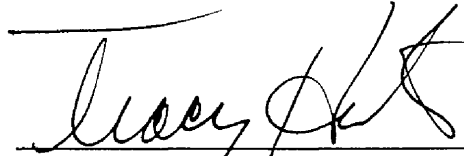
- A. Basic local service
- B. Vertical features
- C. IntraLATA toll
- D. InterLATA toll (intrastate) toll
- E. Extended Calling Plans
- F. Average combined revenue (if not providing all services set forth in A-E above, please identify which are included in this number)

If you have not yet begun to offer or provide service in Florida, please provide your anticipated average revenue per customer for basic service and for total service (excluding interstate long

distance).

SPECIFIC OBJECTION/RESPONSE: See specific objection/response to Interrogatory No. 74. Notwithstanding the objection, data is unavailable for subsections A, B, E and F. The average year-to-date revenue per customer for combined intraLATA toll and interLATA toll (Subsection C and D) is XXX BEGIN CONFIDENTIAL . END CONFIDENTIAL XXX

SUBMITTED this 9th day of December 2003.



TRACY W. HATCH, ESQ.
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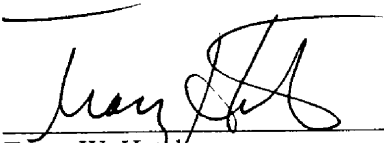
Attorney for AT&T Communications of the
Southern States, LLC

CERTIFICATE OF SERVICE
DOCKET NOS. 030961-TI, 030867-TL, 030868-TL, & 030869-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic and U.S. Mail this 9th day of December, 2003, to the following parties of record:

Beth Keating Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850	BellSouth Telecommunications, Inc. Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640
Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: mgross@fcta.com	MCI WorldCom Communications, Inc. Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: donna.mcnulty@wcom.com
Sprint – Florida Susan S. Masterton/Charles Rehwinkel 1313 Blairstone Road MC: FLTLHO0107 Tallahassee, FL 32301 Phone: (850) 847-0244 Fax: 878-0777 Email: susan.masterton@mail.sprint.com	Office of Public Counsel Charles Beck/H F. Mann c/o The Florida Legislature 111 W. Madison St., #812 Tallahassee, FL 32399-1400 Phone: 850-488-9330
John Fons Ausley & McMullen, P.A. 227 South Calhoun Street Tallahassee, FL 32302	Michael B. Twomey AARP 8903 Crawfordsville Road Tallahassee, FL 32305 Phone: (850) 421-9530 Fax: 421-8543 Email: miketwomey@talstar.com
Mark Cooper AARP 504 Highgate Terrace Silver Spring, MD 20904 Email: markcooper@aol.com	Verizon Florida Inc. Mr. Richard Chapkis 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: richard.chapkis@verizon.com

<p>Messer Law Firm Floyd Self/Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876 Phone: 850-222-0720 Fax: 224-4359</p>	<p>Knology of Florida, Inc. John Feehan 1241 O.G. Skinner Drive West Point, GA 31833-1789 Phone: (706) 634-2828 Fax: (706) 645-0148 Email: john.feehan@knology.com</p>
<p>Gray, Harris & Robinson Karen Jusevitch C. Muniz/George Meros P.O. Box 11189 Tallahassee, FL 32302-3189 Phone: 850-577-9090 Fax: 577-3311 Email: kjusevitch@grayharris.com/GMeros@grayharris.com</p>	



Tracy W. Hatch