

General Attorney

AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301

T: (305) 347-5561 F: (305) 577-4491 granger.gurerangatt.com

REDACTED

May 12, 2010

Ms. Ann Cole, Commission Clerk Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Docket No. 100275-TP: Complaint of BellSouth Re: Telecommunications, Inc. d/b/a AT&T Florida Against **Grande Communications Networks LLC, and**

Grande Communications Networks, Inc.

Dear Ms. Cole:

Yesterday, BellSouth Telecommunications, Inc. d/b/a AT&T Florida's filed a Complaint in the captioned docket. Exhibits A and B were inadvertently omitted from the filing. Portions of those Exhibits may be considered by Grande to be confidential and will be filed under a separate Notice of Intent today. AT&T Florida has attached a redacted version of Exhibits A and B, which we ask that you file in this docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely.

All parties of record CC: Jerry Hendrix COM ___ Gregory R. Follensbee E. Earl Edenfield, Jr. A . A ECR.

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CERTIFICATE OF SERVICE Docket No. 100275-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 12th day of May, 2010 to the following:

Adam Teitzman
General Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

Grande Communications Networks, Inc. Grande Communications Networks LLC Dale B. Schneberger 401 Carlson Circle San Marcos, TX 78666 dale.schneberger@grandecom.com

Bartlett Leber
General Counsel Atlantic Broadband
Grande Communications Networks LLC
401 Carlson Circle
San Marcos, Texas 78666
Tel. No. (617) 786-8800 x112
Fax. No. (512) 878-4010
bleber@atlanticbb.com

Manuel A. Gurdian

Exhibit A



Reginald A. Greene General Attorney T. 404.335.0761 F: 404.614.4054

General Attorney F: 404.614,4054 675 West Peachtree Street reginald.greene@att.com

Suite 4200

Atlanta, Georgia 30375

March 25, 2010

REDACTED

VIA FEDERAL EXPRESS

Grande Communications Networks, Inc. Attn: Mr. Rocky Munoz 401 Carlson Circle San Marcos, Texas 78666

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Re: Demand for Payment - Florida

Dear Mr. Munoz:

Our records indicate that the Grande Communications Networks, Inc. ("Grande") BANs in Florida as listed on the attached spreadsheet have a combined outstanding past due balance of for usage charges as of March 25, 2010.

You have previously disputed some or all of these charges on the basis that the charges are for VoIP traffic that is not subject to any charges under AT&T's Interstate Tariff, Intrastate Tariff or the interconnection agreement ("ICA") between BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") and Grande, dated as of June 29, 2003. AT&T Florida has previously denied those disputes and this letter is final denial of said disputes and a demand for immediate payment of the outstanding balance.

Grande has failed to pay charges for usage that AT&T Florida has properly billed under its Interstate Tariff, Intrastate Tariff and the ICA. Please make payment to AT&T Florida in the amount of in immediately available funds, by April 5, 2010 to avoid further collection action. If AT&T Florida does not receive payment by April 5, 2010, AT&T Florida intends to take legal action to collect these past due charges.

PLEASE REMIT PAYMENT TO:

AT&T ROC-CABS 600 North Point Parkway Alpharetta, Georgia 30005

Sincerely,

Reginald Greene

esmald A. Dres

cc: Stacy Rockett

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	GRANDE COMMUNICATIONS	BHANDE COMMONIONION				.,									

Exhibit B



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April 1, 2010

VIA ELECTRONIC AND OVERNIGHT MAIL

Reginald Greene, General Attorney 675 West Peachtree Street Suite 4200 Atlanta, GA 30375 reginald.greene@att.com

Re:

Grande Communications Networks

Demands for Payment, Georgia and Florida

Dear Mr. Greene:

I am writing on behalf of Grande Communications Networks, LLC, successor in interest to Grande Communications Networks, Inc. ("Grande"). Your letters of March 25, 2010, addressed to Rocky Munoz (copies attached) have been referred to me for response.

Please be advised that Grande denies that it has any obligation to ATT or owes any charges pursuant to ATT's interstate or intrastate access tariffs and we draw your attention to various recent court actions, including *PAETEC Communications*, *Inc. v. CommPartners LLC*, USDC - DC, Civil Action No. 08-0397, Memorandum and Order 2/18/10, and *Global NAPS Illinois*, *Inc. v. Illinois Commerce Commission*, Case No. 09-cv-3113 USDC ND-IL Memorandum Opinion and Order 2/18/10. Accordingly, Grande disputes the entire amounts of the contraction of

As you may be aware, Grande initiated a dialog with ATT last fall relative to these and other issues. John Nolan -- Executive Director AT&T Wholesale in Dallas Texas is familiar with these discussions. We remain willing to discuss this dispute with ATT. Kindly contact me should you wish to discuss this matter.

Sincerely,

GRANDE COMMUNICATIONS NETWORKS LLC

By: Bartlett Leber, General Counsel Atlantic Broadband

<u>bleber@atlanticbb.com</u> (617) 786-8800 x112

cc: R. Munoz J. Benson

M. Murphy

401 Carlson Circle • San Marcos, Texas 78666 • tel 512-878-4000 • fax 512-878-4010 • www.grandecom.com