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Sent: Monday, February 27, 2012 3:56 PM
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Subject: Docket No. 110087-TP

Attachments: Express Phone Obj and Response to 1st ROGS, PODs and RFA 2.27.12.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

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b. This filing is made in Docket No. 110087-TP.

c. The document is filed on behalf of EXPRESS PHONE SERVICE, INC.

d. The total pages in the document are 56 pages.

e. The attached document is EXPRESS PHONE SERVICE, INC.'S OBJECTIONS AND RESPONSES TO AT&T'S FIRST SET OF INTERROGATORIES (NOS. 1-14), FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-9), AND FIRST REQUEST FOR ADMISSIONS (NOS. 1-36).

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DOCUMENT NUMBER-DATE

01103 FEB 27 2012

FPSC-COMMISSION CLERK

2/27/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.

Docket No. 110087-TP

Filed: February 27, 2012

EXPRESS PHONE SERVICE, INC.'S OBJECTIONS AND RESPONSES TO AT&T'S FIRST SET OF INTERROGATORIES (NOS. 1-14), FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-9), AND FIRST REQUEST FOR ADMISSIONS (NOS. 1-36)

Express Phone Service, Inc. (Express Phone), pursuant to Rule 28.106-206, Florida Administrative Code and Rules 1.340, 1.350 and 1.370, Florida Rules of Civil Procedure, submits the following objections and responses to BellSouth Telecommunications, LLC d/b/a AT&T Florida's (AT&T) First Set of Interrogatories (Nos. 1-14), First Request for Production of Documents (Nos. 1-9), and First Request for Admissions (Nos. 1-36).

GENERAL OBJECTIONS

1. Express Phone objects to each and every individual discovery request, to the extent it calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. Express Phone in no way intends to waive any such privilege or protection.

2. Express Phone objects to each individual request to the extent it requires production of information that is proprietary, confidential business information without

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provisions in place to protect the confidentiality of the information. Express Phone in no way intends to waive claims of confidentiality.

3. Express Phone objects to any definitions or instructions accompanying the discovery requests to the extent that they are inconsistent with and expand the scope of discovery specified in the Florida Rules of Civil Procedure that are incorporated into the Model Rules of Procedure or the Commission's rules on discovery. If some question arises as to Express Phone's discovery obligations, Express Phone will comply with applicable rules and not with any of the definitions or instructions accompanying the discovery requests that are inconsistent with or exceed the requirements of those rules. Furthermore, Express Phone objects to any discovery request that calls for Express Phone to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

4. Express Phone objects to any definition or instruction in any discovery request that seeks interrogatory answers containing information from persons or entities who are not parties to this proceeding or that are not subject to discovery under applicable rules.

5. It is possible that not every relevant document may have been reviewed or considered in developing Express Phone's responses to the discovery requests. Rather, Express Phone will provide all the information that it obtained after a good faith, reasonable and diligent search conducted in connection with these discovery requests. To the extent that the discovery requests propose to require more, Express Phone objects to the requests individually and collectively on the grounds that compliance would impose an undue burden or expense on Express Phone.

6. Express Phone objects to each discovery request to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

7. Express Phone objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, burdensome, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests.

8. Express Phone expressly reserves and does not waive any objections it may have to the admissibility, authenticity or relevancy of the information provided in its responses to the subject discovery requests.

9. Express Phone objects to any request that requires the creation of new data, documents or studies.

10. Express Phone objects to providing information already in the public record, that is as easily accessible to AT&T as to Express Phone, or that is already in AT&T's possession.

11. Express Phone objects to every discovery request to the extent the information sought constitutes "trade secrets" which are privileged pursuant to sections 90.506 and 366.093(3)(a), Florida Statutes.

12. Express Phone objects to each discovery request that is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

13. Express Phone objects to any request that seeks to obtain "all" of particular documents, items or information to the extent that such requests are overly broad and burdensome. Any responses provided by Express Phone will be provided to, and without waiver of, the foregoing objection.

**SPECIFIC OBJECTIONS AND RESPONSES TO AT&T'S
FIRST SET OF INTERROGATORIES TO EXPRESS PHONE (NOS. 1- 9)**

1. Identify each witness from whom you intend to offer testimony (live or via pre-filed testimony) at a hearing in this docket, including but not limited to witnesses who will provide direct testimony, rebuttal testimony, and otherwise. For each such person, include a summary of his/her anticipated testimony and a description of his/her relationship to Express Phone.

RESPONSE: Express Phone intends, at this time, to offer the direct testimony of the following witnesses:

- Mr. Tom Armstrong, President of Express Phone. Mr. Armstrong will discuss Express Phone's attempts to adopt another CLEC's interconnection agreement and AT&T's refusal to recognize the adoption.
- Mr. Don J. Wood, consultant to Express Phone. Mr. Wood will discuss the adoption requirements and policy surrounding such requirements.

At this time, Express Phone has made no decision regarding the presentation of rebuttal witnesses or testimony.

2. Identify each consultant or witness who will provide expert testimony (live or via pre-filed testimony) on behalf of Express Phone in this docket, including but not limited to expert witnesses who will provide direct testimony, rebuttal testimony, and otherwise. For each such person, specify the date initially consulted, the date of formal retention (if any), and describe the terms of the financial arrangements or agreement pursuant to which that person or entity will be compensated for work and/or services provided in this case.

RESPONSE: See response to Interrogatory No. 1. Mr. Wood was initially consulted on January 31, 2012. He was formally retained on February 7, 2012. Mr. Wood is being

compensated at a flat rate for his work in this matter. Mr. Armstrong is an employee of Express Phone.

3. For each person identified in response to Interrogatory No. 2, please state the following:

a. The witness' qualifications;

RESPONSE: Mr. Wood: See curriculum vitae of Mr. Wood attached.

Mr. Armstrong: See curriculum vitae of Mr. Armstrong attached.

b. The scope of the witness' employment or retention in this docket;

RESPONSE: Mr. Wood has been retained to review and testify as to the matters at issue in this docket. Mr. Armstrong is an employee of Express Phone.

c. The witness' general litigation experience, including the percentage of work performed for regulatory bodies or public counsel;

RESPONSE: Mr. Wood: See response to Interrogatory No. 3a.

Mr. Armstrong: Mr. Armstrong has appeared as a witness in civil proceedings unrelated to telecommunications issues. Mr. Armstrong appeared as a witness in the Alabama certification of Express Phone, Docket No. 27184.

d. The general substance of the witness' mental impressions and opinions and a brief summary of the basis for them;

RESPONSE: Please see direct testimony of Mr. Wood and Mr. Armstrong which will be filed on March 1, 2012.

e. Identify all documents reviewed by the witness in connection with this docket; and

OBJECTION: See General Objection No. 13.

RESPONSE: Mr. Wood, to date, has reviewed Section 252 of the Telecommunications Act of 1996, 47 CFR §51, Order No. PSC-12-0031-PCO-TP, Order No. PSC-11-0291-PAA-TP, FCC 04-164, Resale Agreement between BellSouth Telecommunications, Inc. and Express Phone Service, Inc., the ICA between NewPhone and AT&T, Express Phone Service, Inc.'s Motion for Summary Order and the Nextel Orders. Mr. Wood is continuing to prepare for this matter and may review additional documents. In addition, Mr. Wood has over 25 years of experience in the telecommunications industry and has reviewed many documents pertinent to the Telecommunications Act of 1996.

Mr. Armstrong has been involved in this docket since its inception and has reviewed all documents received from AT&T regarding this matter, sent to AT&T regarding this matter as well as the regulatory material (or excerpts) provided in Mr. Wood's testimony. Mr. Armstrong has also reviewed the pertinent portions of the Telecommunications Act of 1996, pertinent FCC rules and orders, the Express Phone/AT&T ICA, and the NewPhone/AT&T ICA.

f. Identify with specificity the witness' appearances before regulatory or administrative bodies or courts of law, specifying which regulatory or administrative body or court, the caption or style of each proceeding or case and the date of each appearance. For purposes of this interrogatory, the term "appearance" shall include the submission of pre-filed testimony.

RESPONSE: Mr. Wood: See response to Interrogatory No. 3a.

Mr. Armstrong: See response to Interrogatory No. 3a.

4. Identify all officers and directors for Express Phone from January 1, 2006 to the present. For each such person, specify which position(s) held and the dates the position was held.

OBJECTION: Express Phone objects to Interrogatory No. 4 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Further, Express Phone objects because such information is readily accessible to AT&T via a quick online search.

RESPONSE: Subject to and without waiver of its objections, Express Phone states:

Thomas Armstrong, President, January 1, 2006 to present.

William Kloss, Director, January 1, 2006 to April 1, 2011; Vice-President, April 1, 2011 to present.

5. Describe with specificity the relationship between Express Phone and Digital Express, Inc., including whether Express Phone and Digital Express, Inc. have had any common officers and/or directors at any time from January 1, 2006 to the present, and whether Express Phone and Digital Express, Inc. have used the same business address at any time from January 1, 2006 to the present.

OBJECTION: Express Phone objects to Interrogatory No. 5 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

6. Identify with specificity the Interconnection Agreement that Express Phone sought to adopt through its October 20, 2010 letter to AT&T "Contract Management," including without limitation the docket number under which it was approved by the Florida Public Service Commission.

RESPONSE: Express Phone adopted the Florida Interconnection Agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida (AT&T Florida) and Image Access, Inc. as amended. See, Docket Nos. 060319-TP, 090176-TP.

7. Identify with specificity the Interconnection Agreement that Express Phone sought to adopt through its March 14, 2011 letter to AT&T “Contract Management,” including without limitation the docket number under which it was approved by the Florida Public Service Commission.

RESPONSE: See response to Interrogatory No. 6. Such adoption occurred on October 20, 2010.

8. Identify with specificity the Interconnection Agreement that Express Phone is seeking to adopt through this docket, including without limitation the docket number under which it was approved by the Florida Public Service Commission.

RESPONSE: See Response to Interrogatory No. 6. Such adoption occurred on October 20, 2010.

9. Describe with specificity the reasons why Express Phone sought to obtain a different Interconnection Agreement through: (a) its October 20, 2010 letter to AT&T “Contract Management”; (b) its March 14, 2011 letter to AT&T “Contract Management”; and (c) by commencing this docket.

OBJECTION: Express Phone objects to Interrogatory No. 9 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. The reasons Express Phone sought to adopt another agreement are irrelevant to the issues in this docket.

RESPONSE: Subject to and without waiver of its objections, Express Phone adopted a different agreement to prevent discrimination by AT&T and to foster a competitive market place. This is the express reason behind the federal adoption requirements. As the FCC stated:

We conclude that under an all-or-nothing rule, requesting carriers will be protected from discrimination, as intended by section

252(i). Specifically, an incumbent LEC will not be able to reach a discriminatory agreement for interconnection, services, or network elements with a particular carrier without making that agreement in its entirety available to other requesting carriers. If the agreement includes terms that materially benefit the preferred carrier, other requesting carriers will likely have an incentive to adopt that agreement to gain the benefit of the incumbent LEC's discriminatory bargain. Because these agreements will be available on the same terms and conditions to requesting carriers, the all-or-nothing rule should effectively deter incumbent LECs from engaging in such discrimination. (In the Matter of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338, FCC 04-164 (Second Report and Order) ¶19).

10. Is Express Phone aware of any situation from January 1, 2006 to the present where AT&T Florida has consented to a CLEC's request to adopt another CLEC's interconnection agreement when the requesting CLEC was not within the negotiation window of its then-current interconnection agreement at the time of the adoption request?

OBJECTION: Express Phone objects to Interrogatory No. 10 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Express Phone further objects to this interrogatory as such information is in AT&T's possession.

RESPONSE: Subject to and without waiver of its objection, Express Phone states that it is attempting to obtain this information from AT&T as well as independently. Not all states make ICAs available on line; other states make ICAs available only for a short period of time. Thus far, AT&T has identified one such agreement in its response to Express Phone's First Set of Interrogatories, No. 5.

11. If the answer to Interrogatory No. 10 is "yes," for each such situation, provide:
- a. The name of the requesting CLEC;

b. The date the adoption agreement was entered between AT&T Florida and the requesting CLEC; and

c. The docket number and (if applicable) order number approving the adoption.

OBJECTION AND RESPONSE: See objection and response to Interrogatory No. 10.

12. Is Express Phone aware of any situation from January 1, 2006 to the present where AT&T Florida has consented to a CLEC's request to adopt another CLEC's interconnection agreement when the requesting CLEC was in breach of its then-current interconnection agreement at the time of the adoption request?

OBJECTION: Express Phone objects to Interrogatory No. 12 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. There is nothing in statute or FCC rule of which Express Phone is aware which would permit AT&T or a state regulatory authority to invalidate an adoption based on the breach of another agreement.

RESPONSE: Subject to and without waiver of its objections, Express Phone states that this information is in AT&T's possession and Express Phone will attempt to obtain this information from AT&T.

13. If the answer to Interrogatory No. 12 is "yes," for each such situation, provide:

a. The name of the requesting CLEC;

b. The date the adoption agreement was entered between AT&T Florida and the requesting CLEC; and

c. The docket number and (if applicable) order number approving the adoption.

OBJECTION AND RESPONSE: See objection and response to Interrogatory No. 12.

14. For each Request for Admission served contemporaneously herewith that you do not unequivocally admit, specify all facts supporting your response and identify each person with knowledge of such facts.

RESPONSE: See Express Phone's objections and responses to AT&T's Requests for Admission.

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

1. For each consultant or expert witness you identified in your Answer to Interrogatory No. 2 of AT&T Florida's First Set of Interrogatories served contemporaneously herewith:

a. Produce all direct, rebuttal and/or sur-rebuttal testimony filed with any Public Utility Commission or Public Service Commission, the Federal Communications Commission, or any other state or federal regulatory body in the last five (5) years, deposition transcripts and/or any hearing transcripts for any appearances before any such regulatory authority.

OBJECTION: Express Phone objects to Request No. 1 on the grounds that it is overly broad, unduly burdensome, it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of this objection, Express Phone states that to the extent AT&T wishes to review Mr. Wood's prior testimony, it may access it from the information provided in response to Interrogatory No. 3. To the extent AT&T wishes to review Mr. Armstrong's prior testimony, it may be able to access it from the information provided in response to Interrogatory No. 3. Mr. Armstrong did not submit prefiled testimony and has no transcript of the Alabama proceeding to the extent one exists.

b. Produce all articles, texts, treatises, or other materials, published or submitted for publication by the witness in the last five (5) years.

OBJECTION: Express Phone objects to Request No. 1 on the grounds that it is overly broad, unduly burdensome, it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of this objection, Express Phone states that no such articles or other materials have been published in the last five (5) years.

c. Provide a copy of the witness' most recent *curriculum vitae*.

RESPONSE: See response to Interrogatory No. 3.

2. Produce any and all documents evidencing communications with or evaluations or analyses by any consultant and expert witness identified in response to Interrogatory No. 2.

OBJECTION: Express Phone objects to this request to the extent it requests information or documents protected by the attorney-client privilege and/or the attorney work product doctrine. Any such documents consist of emails between Mr. Armstrong and counsel discussing this case and working drafts of Mr. Wood's testimony.

3. Provide all work-papers, memoranda, documents or other communications of each consultant and expert witness identified in response to Interrogatory No. 2 related to such witness' testimony or the issues in this docket.

OBJECTION: Express Phone objects to this request to the extent it requests information or documents protected by the attorney-client privilege and/or the attorney work product doctrine. Any such documents consist of emails between Mr. Armstrong and counsel discussing this case and working drafts of Mr. Wood's testimony.

4. Produce all records of communications from January 1, 2010 through the present between anyone acting on behalf of Express Phone and anyone acting on behalf of AT&T Florida regarding Express Phone's request(s) for a new interconnection agreement with AT&T Florida.

OBJECTION: See General Objection No. 10. All such information is in AT&T's possession.

5. Provide all documents which Express Phone believes supports its claims or defenses in this docket.

OBJECTION: See General Objection No. 13.

RESPONSE: Subject to and without waiver of its previous objections, see documents referenced or produced herein. In addition, Express Phone is continuing to conduct discovery and research the issues in this case. Also see direct testimony of Mr. Wood and Mr. Armstrong which will be filed on March 1st.

6. Produce all documents Express Phone intends to use as exhibits at the hearing in this docket.

OBJECTION: Express Phone objects to this request to the extent it requests information or documents protected by the attorney-client privilege and/or the attorney work product doctrine.

RESPONSE: Subject to and without waiver of its previous objections, Express Phone states that other than those documents attached to the direct prefiled testimony of Express Phone's witnesses, which will be filed on March 1, 2012, Express Phone has not yet determined which exhibits it will use at hearing.

7. Produce all documents identified in your answers to AT&T's First Set of Interrogatories.

RESPONSE: Subject to and without waiver of its previous objections, see documents referenced or produced herein. Also see direct testimony of Mr. Wood and Mr. Armstrong which will be filed on March 1st.

8. Produce all documents you relied on in preparing your answers to AT&T's First Set of Interrogatories and First Request for Admission.

RESPONSE: Subject to and without waiver of its previous objections, see documents referenced or produced herein. Also see direct testimony of Mr. Wood and Mr. Armstrong which will be filed on March 1st.

9. For each Request for Admission served contemporaneously herewith that you do not unequivocally admit, produce all documents supporting your response.

RESPONSE: Subject to and without waiver of its previous objections, see documents referenced or produced herein. Also see direct testimony of Mr. Wood and Mr. Armstrong which will be filed on March 1st.

FIRST REQUEST FOR ADMISSIONS

1. Admit that prior to October 20, 2010, bills were sent on behalf of AT&T Florida to Express Phone for resale services provided in the State of Florida, which Express Phone did not pay in full.

OBJECTION: Express Phone objects to Request for Admission No. 1 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

2. Admit that prior to March 14, 2011, bills were sent on behalf of AT&T Florida to Express Phone for resale services provided in the State of Florida, which Express Phone did not pay in full.

OBJECTION: Express Phone objects to Request for Admission No. 2 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

3. Admit that prior to March 29, 2011, bills were sent on behalf of AT&T Florida to Express Phone for resale services provided in the State of Florida, which Express Phone did not pay in full.

OBJECTION: Express Phone objects to Request for Admission No. 3 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

4. Admit that prior to April 4, 2011, bills were sent on behalf of AT&T Florida to Express Phone for resale services provided in the State of Florida, which Express Phone did not pay in full.

OBJECTION: Express Phone objects to Request for Admission No. 4 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

5. Admit that on October 20, 2010, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 5 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

6. Admit that on November 1, 2010, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 6 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

7. Admit that on March 14, 2011, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 7 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

8. Admit that on March 25, 2011, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 8 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

9. Admit that on March 29, 2011, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 9 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

10. Admit that on April 4, 2011, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 10 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

11. Admit that on April 6, 2011, Express Phone had an outstanding past due balance on its resale Billing Account Numbers with AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 11 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

12. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket went into effect by operation of law on July 3, 2006.

RESPONSE: Subject to and without waiver of its objections and with the further objection that this information is already in AT&T's possession and could easily have been obtained on line, Express Phone admits this request.

13. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket went into effect before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on October 20, 2010.

OBJECTION: Express Phone objects to Request for Admission No. 13 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and that it contains a faulty factual premise.

RESPONSE: Subject to and without waiver of its objection, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

14. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket went into effect before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on March 14, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 14 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty factual premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

15. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket went into effect before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on March 29, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 15 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty factual premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

16. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket went into effect before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on April 4, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 16 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty factual premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

17. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket was publicly filed with the Commission in April 2006.

OBJECTION: Express Phone objects to Request for Admission No. 17 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty premise. Further, Express Phone objects because such information is readily accessible to AT&T via a quick online search.

RESPONSE: Subject to and without waiver of its objections, this request is admitted.

18. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket was publicly filed with the Commission before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on October 20, 2010.

OBJECTION: Express Phone objects to Request for Admission No. 18 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty factual premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

19. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket was publicly filed with the Commission before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on March 14, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 19 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

20. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket was publicly filed with the Commission before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on March 29, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 20 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and contains a faulty premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

21. Admit that the Interconnection Agreement that Express Phone is seeking to adopt in this docket was publicly filed with the Commission before Express Phone entered the Resale Agreement that it had with BellSouth Telecommunications, Inc. on April 4, 2011.

OBJECTION: Express Phone objects to Request for Admission No. 21 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence and is based on a faulty premise.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone states that the agreement Express Phone had with AT&T on October 20, 2010 was the agreement between AT&T and NewPhone described in Interrogatory No. 6.

22. Admit that the Interconnection Agreement that Express Phone sought to adopt through its October 20, 2010 letter was not available for adoption in Florida in October 2010.

RESPONSE: Denied.

23. Admit that the Interconnection Agreement that Express Phone sought to adopt through its October 20, 2010 letter was between “Southwestern Bell Texas” and Image Access, Inc. d/b/a New Phone, Inc.

RESPONSE: Denied.

24. Admit that the Interconnection Agreement that Express Phone sought to adopt through its October 20, 2010 letter was between Southwestern Bell Telephone Company and Image Access, Inc. d/b/a New Phone, Inc.

RESPONSE: Denied.

25. Admit that Express Phone never sought Commission intervention during the negotiations of the Resale Agreement that it entered with BellSouth Telecommunications, Inc. on October 4, 2006.

OBJECTION: Express Phone objects to Request for Admission No. 25 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone never had any negotiations with AT&T. Rather, an AT&T agreement was presented to Express Phone for execution, as a take it or leave it proposition, in order to do business with AT&T. Further, when Express Phone executed the agreement, it believed that AT&T would proceed in good faith under the agreement and promptly and reasonably deal with disputes, including those dealing with promotional credits. This has not occurred.

26. Admit that Express Phone did not oppose the request for approval of resale agreement with Express Phone that BellSouth Telecommunications, Inc. filed with the Commission on November 2, 2006.

OBJECTION: Express Phone objects to Request for Admission No. 26 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of its objection, Express Phone admits this request.

27. Admit that on October 20, 2010, the Resale Agreement between Express Phone and AT&T Florida was an enforceable and binding contract.

OBJECTION: Express Phone objects to Request for Admission No. 27 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone had adopted the agreement between NewPhone and AT&T at that time.

28. Admit that on November 1, 2010, the Resale Agreement between Express Phone and AT&T Florida was an enforceable and binding contract.

OBJECTION: Express Phone objects to Request for Admission No. 28 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiver of its objections, this request is denied. Express Phone had adopted the agreement between NewPhone and AT&T.

29. Admit that on October 20, 2010, the negotiation window for a new contract between Express Phone and AT&T Florida was not open pursuant to the terms of the Resale Agreement between Express Phone and AT&T Florida.

OBJECTION: Express Phone objects to Request for Admission No. 29 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Further, such request is based on a faulty premise that renegotiation of an existing ICA is related to or has any bearing on adoption. Adoptions are not negotiated matters.

30. Admit that on November 1, 2010, the negotiation window for a new contract between Express Phone and AT&T Florida was not open pursuant to the terms of the Resale Agreement between Express Phone and AT&T Florida.

OBJECTION: See objection to Request for Admission No. 29.

31. Admit that one reason Express Phone is seeking to adopt the April 2006 Interconnection Agreement between AT&T Florida and Image Access, Inc. d/b/a New Phone, Inc. is because “the NewPhone ICA is more favorable as it allows the CLEC to retain its funds until a disputed item is resolved,” as Express Phone argued in its Motion for Summary Final Order in this docket.

OBJECTION: Express Phone objects to Request for Admission No. 31 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Reasons for a CLEC’s decision to adopt an ICA are not related in any way to its right to do so.

RESPONSE: Subject to and without waiver of its objections, Express Phone admits this request. Such reason is specifically contemplated by 47 U.S.C. §252(i) and 47 C.F.R. §51.809. The purpose of these laws and regulations is to prevent AT&T from discriminating among CLECs. As the FCC has said:

We conclude that under an all-or-nothing rule, requesting carriers will be protected from discrimination, as intended by section 252(i). Specifically, an incumbent LEC will not be able to reach a discriminatory agreement for interconnection, services, or network elements with a particular carrier without making that agreement in its entirety available to other requesting carriers. If the agreement includes terms that materially benefit the preferred carrier, other requesting carriers will likely have an incentive to adopt that agreement to gain the benefit of the incumbent LEC's discriminatory bargain. Because these agreements will be available on the same terms and conditions to requesting carriers, the all-or-nothing rule should effectively deter incumbent LECs from engaging in such discrimination. (In the Matter of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338, FCC 04-164 (Second Report and Order) ¶19).

32. Admit that one reason Express Phone is seeking to adopt the April 2006 Interconnection Agreement between AT&T Florida and Image Access, Inc. d/b/a New Phone, Inc. is because the “ICA between AT&T and Express Phone contains provisions which AT&T argues require Express Phone require Express Phone to pay all amounts AT&T claims are due to it, even amounts in dispute,” as Express Phone argued in its Motion for Summary Final Order in this docket.

OBJECTION: Express Phone objects to Request for Admission No. 32 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Reasons for a CLEC’s decision to adopt an ICA are not related in any way to its right to do so.

RESPONSE: Subject to and without waiver of its objections, Express Phone admits this request. Such reason is specifically contemplated by 47 U.S.C. §252(i) and 47 C.F.R. §51.809. The purpose of these laws and regulations is to prevent AT&T from discriminating among CLECs. As the FCC has said:

We conclude that under an all-or-nothing rule, requesting carriers will be protected from discrimination, as intended by section 252(i). Specifically, an incumbent LEC will not be able to reach a discriminatory agreement for interconnection, services, or network elements with a particular carrier without making that agreement in its entirety available to other requesting carriers. If the agreement includes terms that materially benefit the preferred carrier, other requesting carriers will likely have an incentive to adopt that agreement to gain the benefit of the incumbent LEC's discriminatory bargain. Because these agreements will be available on the same terms and conditions to requesting carriers, the all-or-nothing rule should effectively deter incumbent LECs from engaging in such discrimination. (In the Matter of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338, FCC 04-164 (Second Report and Order) ¶19).

33. Admit that one reason Express Phone is seeking to adopt the April 2006 Interconnection Agreement between AT&T Florida and Image Access, Inc. d/b/a New Phone, Inc. is because “the NewPhone ICA contains provisions which require the CLEC to pay *undisputed* amounts to AT&T until any disputes are resolved,” as Express Phone argued in its Motion for Summary Final Order in this docket.

OBJECTION: Express Phone objects to Request for Admission No. 32 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. The reasons a CLEC may have to adopt an ICA are not related in any way to its right to do so.

RESPONSE: Subject to and without waiver of its objections, Express Phone admits this request. Such reason is specifically contemplated by 47 U.S.C. §252(i) and 47 C.F.R. §51.809. The purpose of these laws and regulations is to prevent AT&T from discriminating among CLECs. As the FCC has said:

We conclude that under an all-or-nothing rule, requesting carriers will be protected from discrimination, as intended by section 252(i). Specifically, an incumbent LEC will not be able to reach a discriminatory agreement for interconnection, services, or network elements with a particular carrier without making that agreement in its entirety available to other requesting carriers. If the agreement includes terms that materially benefit the preferred carrier, other requesting carriers will likely have an incentive to adopt that agreement to gain the benefit of the incumbent LEC's discriminatory bargain. Because these agreements will be available on the same terms and conditions to requesting carriers, the all-or-nothing rule should effectively deter incumbent LECs from engaging in such discrimination. (In the Matter of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338, FCC 04-164 (Second Report and Order) ¶19).

34. Admit that one reason Express Phone is seeking to adopt the April 2006 Interconnection Agreement between AT&T Florida and Image Access, Inc. d/b/a New Phone,

Inc. is because the “the [billing] dispute” between AT&T Florida and Express Phone “is moot under the adoption of the NewPhone ICA,” as Express Phone argued in Footnote 5 of its April 4, 2011 letter in this docket.

OBJECTION: Express Phone objects to Request for Admission No. 34 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiving its objections, Express Phone admits that it made that statement in the letter referenced; however, Express Phone clarifies herein that the underlying billing dispute between the parties is not moot, it is the adoption of the NewPhone ICA that has been effectuated.

35. Admit that Express Phone is not aware of any situation from January 1, 2006 to the present where AT&T Florida has consented to a CLEC’s request to adopt another CLEC’s interconnection agreement when the requesting CLEC was not within the negotiation window of its then-current interconnection agreement at the time of the adoption request.

OBJECTION: Express Phone objects to Request for Admission No. 35 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Express Phone is unable to admit or deny this request and is continuing to make reasonable inquiry as to this matter. Express Phone further notes that AT&T has identified at least one such situation in its response to Express Phone’s 1st Set of Interrogatories, No. 5.

36. Admit that Express Phone is not aware of any situation from January 1, 2006 to the present where AT&T Florida has consented to a CLEC’s request to adopt another CLEC’s

interconnection agreement when the requesting CLEC was in breach of its then-current interconnection agreement at the time of the adoption request.

OBJECTION: Express Phone objects to Request for Admission No. 36 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Express Phone is unable to admit or deny this request and is continuing to make reasonable inquiry as to this matter.

s/ Vicki Gordon Kaufman _____

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Attorneys for Express Phone Service, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Express Phone Service, Inc.'s Objections And Responses To AT&T's First Set Of Interrogatories (Nos. 1-14), First Request For Production Of Documents (Nos. 1-9), and First Request For Admissions (Nos. 1-36) has been furnished by Electronic Mail and U.S. Mail this 27th day of February, 2012, to the following:

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Florida Public Service Commission
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Tallahassee, FL 32399
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AT&T
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Thatch@att.com

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman

Express Phone Service, Inc.
Docket No. 110087-TP
AT&T's 1st Set of Interrogatories
Response to Interrogatory No. 3a

Curriculum Vitae of Don J. Wood

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CURRENT EMPLOYMENT

Don J. Wood is a principal in the firm of Wood & Wood. He provides economic, financial, and regulatory analysis services in technology-driven industries, specializing in economic policy related to the development of competitive markets, cost of service issues, and the calculation of financial damages. In addition, Mr. Wood advises industry associations on regulatory and economic policy and assists investors in their evaluation of investment opportunities.

In the area of administrative law, Mr. Wood has presented testimony before the regulatory bodies of forty-three states, the District of Columbia, and Puerto Rico, and has prepared comments and testimony for filing with the Federal Communications Commission. The subject matter of his testimony has ranged from broad policy issues to detailed cost and rate analysis.

Mr. Wood has also presented testimony in state, federal, and overseas courts regarding business plans and strategies, competition policy, intercarrier compensation disputes, and cost of service issues. He has presented studies of the damages incurred by plaintiffs and has provided rebuttal testimony to damage calculations performed by others. Mr. Wood has also testified in alternative dispute resolution proceedings conducted pursuant to both AAA and CPR rules.

Mr. Wood is an experienced commercial mediator and is registered as a neutral with the Georgia Office of Dispute Resolution.

PREVIOUS EMPLOYMENT

Klick, Kent & Allen/FTI Consulting, Inc.

Regional Director.

GDS Associates, Inc.

Senior Project Manager.

MCI Telecommunications Corporation

Manager of Regulatory Analysis, Southeast Division.

Manager, Corporate Economic Analysis and Regulatory Affairs.

BellSouth Services, Inc.

Staff Manager.

Georgia Power Company/Southern Company Services, Inc.

Generating Plant Construction cost analyst and scheduler.

EDUCATION

Emory University, Atlanta, Ga.

BBA in Finance, with Distinction (1985).

College of William and Mary, Williamsburg, Va.

MBA, with concentrations in Finance and Microeconomics (1987).

TESTIMONY - STATE REGULATORY COMMISSIONS:

Alabama Public Service Commission

Docket No. 19356, Phase III: Alabama Public Service Commission vs. All Telephone Companies Operating in Alabama, and Docket 21455: AT&T Communications of the South Central States, Inc., Applicant, Application for a Certificate of Public Convenience and Necessity to Provide Limited IntraLATA Telecommunications Service in the State of Alabama.

Docket No. 20895: In Re: Petition for Approval to Introduce Business Line Termination for MCI's 800 Service.

Docket No. 21071: In Re: Petition by South Central Bell for Introduction of Bidirectional Measured Service.

Docket No. 21067: In Re: Petition by South Central Bell to Offer Dial Back-Up Service and 2400 BPS Central Office Data Set for Use with PulseLink Public Packet Switching Network Service.

Docket No. 21378: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. 21865: In Re: Petition by South Central Bell for Approval of Tariff Revisions to Introduce Network Services to be Offered as a Part of Open Network Architecture.

Docket No. 25703: In Re: In the Matter of the Interconnection Agreement Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 25704: In Re: Petition by AT&T Communications of the South Central States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE South Incorporated and CONTEL of the South, Inc. Concerning Interconnection and Resale under the Telecommunications Act of 1996.

Docket No. 25835: In Re: Petition for Approval of a Statement of Generally Available Terms and Conditions Pursuant to §252(f) of the Telecommunications Act of 1996 and Notification of Intention to File a §271 Petition for In-Region InterLATA Authority with the Federal Communications Commission Pursuant to the Telecommunications Act of 1996.

Docket No. 26029: In Re: Generic Proceeding - Consideration of TELRIC Studies.

Docket No. 25980: Implementation of the Universal Support Requirements of Section 254 of the Telecommunications Act of 1996.

Docket No. 27091: Petition for Arbitration by ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. 27821: Generic Proceeding to Establish Prices for Interconnection Services and Unbundled Network Elements.

Docket Nos. 27989 and 15957: BellSouth "Full Circle" Promotion and Generic Proceeding Considering the Promulgation of Telephone Rules Governing Promotions.

Docket No. 28841: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. 29075: Petition of CenturyTel to Establish Wholesale Avoidable Cost Discount Rates for Resale of Local Exchange Service.

Docket No. 29054: IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II – Local Switching for Mass Market Customers).

Docket No. 29172: Southern Public Communication Association, Complainant, and BellSouth Telecommunications, Inc., Defendant.

Docket No. 31176: Deltacom, Inc. v. KMC Data, LLC, Hypercube, LLC, and Hypercube Telecom LLC.

The Regulatory Commission of Alaska

Case No. U-02-039: In the Matter of Request by Alaska Digitel, LLC for Designation as a Carrier Eligible To Receive Federal Universal Service Support Under the Telecommunications Act of 1996.

Case No. U-04-62: In the Matter of the Request by Alaska Wireless Communications, LLC For Designation as a Carrier Eligible to Receive Federal Universal Service Support Under the Telecommunications Act of 1996.

Arkansas Public Service Commission

Docket No. 92-337-R: In the Matter of the Application for a Rule Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

Public Utilities Commission of the State of California

Rulemaking 00-02-005: Order Instituting Rulemaking on the Commission's Own Motion into Reciprocal Compensation for Telephone Traffic Transmitted to Internet Service Provider Modems.

Application Nos. 01-02-024, 01-02-035, 02-02-031, 02-02-032, 02-02-034, 02-03-002: Applications for the Commission to Reexamine the Recurring Costs and Prices of Unbundled Network Element Costs Pursuant to Ordering Paragraph 11 of D.99-11-050.

Application No. 05-02-027: In the Matter of the Joint Application of SBC Communications Inc. ("SBC") and AT&T Corp. ("AT&T") for Authorization to Transfer Control of AT&T Communications of California (U-5002), TCG Los Angeles, Inc. (U-5462), TCG San Diego (U-5389), and TCG San Francisco (U-5454) to SBC, Which Will Occur Indirectly as a Result of AT&T's Merger With a Wholly-Owned Subsidiary of SBC, Tau Merger Sub Corporation.

Application No. 05-04-020: In the Matter of the Joint Application of Verizon Communications Inc. ("Verizon") and MCI, Inc. ("MCI") to Transfer Control of MCI's California Utility Subsidiaries to Verizon, Which Will Occur Indirectly as a Result of Verizon's Acquisition of MCI.

Public Utilities Commission of the State of Colorado

Docket No. 96A-345T: In the Matter of the Interconnection Contract Negotiations Between AT&T Communications of the Mountain States, Inc., and US West Communications, Inc., Pursuant to 47 U.S.C. Section 252. Docket No. 96A-366T: In the Matter of the Petition of MCIMetro Access Transmission Services, Inc., for Arbitration Pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with US West Communications, Inc. (consolidated).

Docket No. 96S-257T: In Re: The Investigation and Suspension of Tariff Sheets Filed by US West Communications, Inc., with Advice Letter No. 2608 Regarding Proposed Rate Changes.

Docket No. 98F-146T: Colorado Payphone Association, Complainant, v. US West Communications, Inc., Respondent.

Docket No. 02A-276T: In the Matter of the Application of Wiggins Telephone Association for Approval of its Disaggregation Plan

Docket No. 02A-444T: In the Matter of NECC's Application to Redefine the Service Area of Eastern Slope Rural Telephone Association, Inc., Great Plains Communications, Inc., Plains Coop Telephone Association, Inc., and Sunflower Telephone Co., Inc.

Docket No. 07A-153T: In the Matter of the Combined Application of N.E. Colorado Cellular, Inc. for Designation as an Eligible Telecommunications Carrier and Eligible Provider in Additional Areas of Colorado.

Docket No. 09a-107t: In the Matter of the Application of N.E. Colorado Cellular, Inc. D/B/A Viaero Wireless for Initial Receipt of Support From Colorado High Cost Support Mechanism for New Territories.

Docket No. 10R-191T: In the Matter of Proposed Rules Relating to the Colorado High Cost Support Mechanism Regulations 723-2.

State of Connecticut, Department of Utility Control

Docket 91-12-19: DPUC Review of Intrastate Telecommunications Services Open to Competition (Comments).

Docket No. 94-07-02: Development of the Assumptions, Tests, Analysis, and Review to Govern Telecommunications Service Reclassifications in Light of the Eight Criteria Set Forth in Section 6 of Public Act 94-83 (Comments).

Docket No. 03-11-16: Petition of Tel Comm Technologies, et. al., for Review and Amendment of Southern New England Telephone Company's Charges for Pay Telephone Access Services.

Delaware Public Service Commission

Docket No. 93-31T: In the Matter of the Application of The Diamond State Telephone Company for Establishment of Rules and Rates for the Provision of IntelliLinQ-PRI and IntelliLinQ-BRI.

Docket No. 41: In the Matter of the Development of Regulations for the Implementation of the Telecommunications Technology Investment Act.

Docket No. 96-324: In the Matter of the Application of Bell Atlantic-Delaware, Inc. for Approval of its Statement of Terms and Conditions Under Section 252(f) of the Telecommunications Act of 1996 (Phase II).

Docket No. 02-001: In the Matter of the Inquiry into Verizon Delaware Inc.'s Compliance with the Conditions Set Forth in 47 U.S.C. § 271(c).

Florida Public Service Commission

Docket No. 881257-TL: In Re: Proposed Tariff by Southern Bell to Introduce New Features for Digital ESSX Service, and to Provide Structural Changes for both ESSX Service and Digital ESSX Service.

Docket No. 880812-TP: In Re: Investigation into Equal Access Exchange Areas (EAEAs), Toll Monopoly Areas (TMAs), 1+ Restriction to the Local Exchange Companies (LECs), and Elimination of the Access Discount.

Docket No. 890183-TL: In Re: Generic Investigation into the Operations of Alternate Access Vendors.

Docket No. 870347-TI: In Re: Petition of AT&T Communications of the Southern States for Commission Forbearance from Earnings Regulation and Waiver of Rule 25-4.495(1) and 25-24.480 (1) (b), F.A.C., for a trial period.

Docket No. 900708-TL: In Re: Investigation of Methodology to Account for Access Charges in Local Exchange Company (LEC) Toll Pricing.

Docket No. 900633-TL: In Re: Development of Local Exchange Company Cost of Service Study Methodology.

Docket No. 910757-TP: In Re: Investigation into the Regulatory Safeguards Required to Prevent Cross-Subsidization by Telephone Companies.

Docket No. 920260-TL: In Re: Petition of Southern Bell Telephone and Telegraph Company for Rate Stabilization, Implementation Orders, and Other Relief.

Docket No. 950985-TP: In Re: Resolution of Petitions to establish 1995 rates, terms, and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes.

Docket No. 960846-TP: In Re: Petition by MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. for Arbitration of Certain Terms and Conditions of a proposed agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 and Docket No. 960833-TP: In Re: Petition by AT&T Communications of the Southern States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 960847-TP and 960980-TP: In Re: Petition by AT&T Communications of the Southern States, Inc., MCI Telecommunications Corporation, MCI Metro Access Transmission Service, Inc., for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE Florida Incorporated Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 961230-TP: In Re: Petition by MCI Telecommunications Corporation for Arbitration with United Telephone Company of Florida and Central Telephone Company of Florida Concerning Interconnection Rates, Terms, and Conditions, Pursuant to the Federal Telecommunications Act of 1996.

Docket No. 960786-TL: In Re: Consideration of BellSouth Telecommunications, Inc.'s Entry Into InterLATA Services Pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket Nos. 960833-TP, 960846-TP, 960757-TP, and 971140-TP: Investigation to develop permanent rates for certain unbundled network elements.

Docket No. 980696-TP: In Re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025 Florida Statutes.

Docket No. 990750-TP: Petition by ITC^DeltaCom Communications, Inc., d/b/a/ ITC^DeltaCom, for arbitration of certain unresolved issues in interconnection negotiations between ITC^DeltaCom and BellSouth Telecommunications, Inc.

Docket No. 991605-TP: Petition of BellSouth Telecommunications, Inc. for Arbitration of the Interconnection Agreement Between Time Warner Telecom of Florida, L.P., pursuant to Section 252 (b) of the Telecommunications Act of 1996.

Docket No. 030137-TP: In re: Petition for Arbitration of Unresolved Issues in Negotiation of Interconnection Agreement with BellSouth Telecommunications, Inc. by ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom.

Docket No. 030300-TP: In re: Petition for expedited review of BellSouth Telecommunications, Inc.'s intrastate tariffs for pay telephone access services (PTAS) rate with respect to rates for payphone line access, usage, and features, by Florida Public Telecommunications Association.

Docket No. 030851-TP: In Re: Implementation of Requirements Arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers.

Docket No. 040353-TP: In Re: Petition of Supra Telecommunications and Information Systems, Inc. to Review and Cancel BellSouth's Promotional Offering Tariffs Offered In Conjunction with its New Flat Rate Service Known as PreferredPack.

Docket No. 040604-TL: In Re: Adoption of the National School Lunch Program and an Income-based Criterion at or Below 135% of the Federal Poverty Guidelines as Eligibility Criteria for the Lifeline and Linkup Programs.

Docket No. 050119-TP: Joint Petition of TDS Telecom d/b/a TDS Telecom/Quincy Telephone, ALLTEL Florida, Inc., Northeast Florida Telephone Company d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom, ITS Telecommunications Systems, Inc., and Frontier Communications of the South, LLC ("Joint Petitioners") objecting to and requesting suspension of Proposed Transit Traffic Service Tariff filed by BellSouth Telecommunications, Inc. and Docket No. 050125-TP: Petition and complaint for suspension and cancellation of Transit Tariff Service No. FL 2004-284 filed by BellSouth Telecommunications, Inc. by AT&T Communications of the Southern States, LLC (consolidated).

Docket No. 060598-TL: In Re: Petition by BellSouth Telecommunications, Inc., Pursuant to Florida Statutes §364.051(4) to Recover 2005 Tropical System Related Costs and Expenses.

Docket No. 060644-TL: Petition by Embarq Florida, Inc., Pursuant to Florida Statutes §364.051(4) to Recover 2005 Tropical System Related Costs and Expenses.

Docket No. 060763-TL: In Re: Petition for waiver of carrier of last resort obligations for multitenant property in Collier County known as Treviso Bay, by Embarq Florida, Inc.

Docket No. 090327-TP: In re: Petition of DeltaCom, Inc. for order determining DeltaCom, Inc. not liable for access charges of KMC Data LLC and Hypercube Telecom, LLC.

Georgia Public Service Commission

Docket No. 3882-U: In Re: Investigation into Incentive Telephone Regulation in Georgia.

Docket No. 3883-U: In Re: Investigation into the Level and Structure of Intrastate Access Charges.

Docket No. 3921-U: In Re: Compliance and Implementation of Senate Bill 524.

Docket No. 3905-U: In Re: Southern Bell Rule Nisi.

Docket No. 3995-U: In Re: IntraLATA Toll Competition.

Docket No. 4018-U: In Re: Review of Open Network Architecture (ONA) (Comments).

Docket No. 5258-U: In Re: Petition of BellSouth Telecommunications for Consideration and Approval of its "Georgians FIRST" (Price Caps) Proposal.

Docket No. 5825-U: In Re: The Creation of a Universal Access Fund as Required by the Telecommunications Competition and Development Act of 1995.

Docket No. 6801-U: In Re: Interconnection Negotiations Between BellSouth Telecommunications, Inc. and AT&T Communications of the Southern States, Inc., Pursuant to Sections 251-252 and 271 of the Telecommunications Act of 1996.

Docket No. 6865-U: In Re: Petition by MCI for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Docket No. 7253-U: In Re: BellSouth Telecommunications, Inc.'s Statement of Generally Available Terms and Conditions Under Section 252 (f) of the Telecommunications Act of 1996.

Docket No. 7061-U: In Re: Review of Cost Studies and Methodologies for Interconnection and Unbundling of BellSouth Telecommunications Services.

Docket No. 10692-U: In Re: Generic Proceeding to Establish Long-Term Pricing Policies for Unbundled Network Elements.

Docket No. 10854-U: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. 16583-U: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. 17749-U: In Re: FCC's Triennial Review Order Regarding the Impairment of Local Switching for Mass Market Customers.

Docket No. 22682-U: In Re: Notice of Merger of AT&T, Inc. and BellSouth Corporation together with its Certificated Georgia Subsidiaries.

Public Utilities Commission of Hawaii

Docket No. 7702: In the Matter of Instituting a Proceeding on Communications, Including an Investigation of the Communications Infrastructure of the State of Hawaii.

Idaho Public Utilities Commission

Case No. GNR-T-03-08: In the Matter of the Petition of IAT Communications, Inc., d/b/a NTCDIdaho, Inc., or ClearTalk, for Designation as an Eligible Telecommunications Carrier, and Case No. GNR-T-03-16: In the Matter of the Application of NCPR, Inc., d/b/a Nextel Partners, seeking designation as an Eligible Telecommunications Carrier.

Illinois Commerce Commission

Docket No. 04-0653: USCOC of Illinois RSA #1, LLC., USCOC of Illinois RSA #4 LLC., USCOC of Illinois Rockford, LLC., and USCOC of Central Illinois, LLC. Petition for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C. Section 214(e)(2).

Docket Nos. 05-0644, 05-0649, and 05-0657: Petition of Hamilton County Telephone Co-Op et. al. for Arbitration under the Telecommunications Act to Establish Terms and Conditions for Reciprocal Compensation with Verizon Wireless and its Constituent Companies.

Indiana Utility Regulatory Commission

Cause No. 42303: In the Matter of the Complaint of the Indiana Payphone Association for a Commission Determination of Just and Reasonable Rates and Charges and Compliance with Federal Regulations.

Cause No. 41052-ETC-43: In the Matter of the Designation of Eligible Telecommunications Carriers by the Indiana Utility Regulatory Commission Pursuant to the Telecommunications Act of 1996 and Related FCC Orders. In Particular, the Application of NPCR, Inc. d/b/a Nextel Partners to be Designated.

Cause No. 42530: In the Matter of the Indiana Utility Regulatory Commission's Investigation of Matters Related to Competition in the State of Indiana Pursuant to Ind. Code 8-1-2 *et seq.*

Iowa Utilities Board

Docket No. RPU-95-10.

Docket No. RPU-95-11.

State Corporation Commission of the State of Kansas

Docket No. 00-GIMT-1054-GIT: In the Matter of a General Investigation to Determine Whether Reciprocal Compensation Should Be Paid for Traffic to an Internet Service Provider.

Docket No. 04-RCCT-338-ETC: In the Matter of Petition of RCC Minnesota, Inc. for Designation as an Eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2).

Docket No. 07-GIMT-498-GIT: In the Matter of a Review of the Commission's Federal USF Certification Requirements to Remove All Expenses and Investments by Competitive Eligible Telecommunications Carriers in a Southwestern Bell Telephone, L.P., Study Area from the Competitive Eligible Telecommunications Carrier's Justification of Use of High Cost Federal USF Support.

Docket No. 06-GIMT-187-GIT: IN the Matter of the General Investigation into the Commission's Telecommunications Billing Practices Standards.

Docket No. 11-CELZ-176-ETC: In the Matter of the Application of Cellco Partnership and Affiliates to Amend Eligible Telecommunications Carrier Designation Docket No. 11-CELZ-176-ETC in the State of Kansas.

Kentucky Public Service Commission

Administrative Case No. 10321: In the Matter of the Tariff Filing of South Central Bell Telephone Company to Establish and Offer Pulselink Service.

Administrative Case No. 323: In the Matter of An Inquiry into IntraLATA Toll Competition, An Appropriate Compensation Scheme for Completion of IntraLATA Calls by Interexchange Carriers, and WATS Jurisdictionality.

- Phase IA: Determination of whether intraLATA toll competition is in the public interest.

- Phase IB: Determination of a method of implementing intraLATA competition.

- Rehearing on issue of Imputation.

Administrative Case No. 90-256, Phase II: In the Matter of A Review of the Rates and Charges and Incentive Regulation Plan of South Central Bell Telephone Company.

Administrative Case No. 336: In the Matter of an Investigation into the Elimination of Switched Access Service Discounts and Adoption of Time of Day Switch Access Service Rates.

Administrative Case No. 91-250: In the Matter of South Central Bell Telephone Company's Proposed Area Calling Service Tariff.

Administrative Case No. 96-431: In Re: Petition by MCI for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Administrative Case No. 96-478: In Re: The Petition by AT&T Communications of the South Central States, Inc. for Arbitration of Certain Terms and Conditions of a Proposed Agreement with GTE South Incorporated Concerning Interconnection and Resale Under the Telecommunications Act of 1996.

Administrative Case No. 96-482: In Re: The Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Administrative Case No. 360: In the Matter of: An Inquiry into Universal Service and Funding Issues.

Administrative Case No. 96-608: In the Matter of: Investigation Concerning the Provision of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Administrative Case No. 382: An Inquiry into the Development of Deaveraged Rates for Unbundled Network Elements.

Case No. 2003-00143: In the Matter of: Petition of NCPR, Inc., d/b/a Nextel Partners for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky.

Case No. 2003-00397: Review of Federal Communications Commission's Triennial Review Order Regarding Unbundling Requirements for Individual Network Elements.

Case Nos. 2006-00215: Petition of Ballard Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, and consolidated Case Nos. 2006-00217, 2006-00218, 2006-00220, 2006-00252, 2006-00255, 2006-00288, 2006-00292, 2006-00294, 2006-00296, 2006-00298, and 2006-00300.

Case No. 2008-00135: In the Matter of Complaint of Sprint Communications Company L.P. Against Brandenburg Telephone Company for the Unlawful Imposition of Access Charges.

Louisiana Public Service Commission

Docket No. 17970: In Re: Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of AT&T Communications of the South Central States, Inc., in its Louisiana Operations.

Docket No. U-17949: In the Matter of an Investigation of the Revenue Requirements, Rate Structures, Charges, Services, Rate of Return, and Construction Program of South Central Bell Telephone Company, Its Louisiana Intrastate Operations, The Appropriate Level of Access Charges, and All Matters Relevant to the Rates and Service Rendered by the Company.

- Subdocket A (SCB Earnings Phase)
- Subdocket B (Generic Competition Phase)

Docket No. 18913-U: In Re: South Central Bell's Request for Approval of Tariff Revisions to Restructure ESSX and Digital ESSX Service.

Docket No. U-18851: In Re: Petition for Elimination of Disparity in Access Tariff Rates.

Docket No. U-22022: In Re: Review and Consideration of BellSouth Telecommunications, Inc.'s TSLRIC and LRIC Cost Studies Submitted Pursuant to Sections 901(C) and 1001(E) of the Regulations for Competition in the Local Telecommunications Market as Adopted by General Order Dated March 15, 1996 in Order to Determine the Cost of Interconnection Services and Unbundled Network Components to Establish Reasonable, Non-Discriminatory, Cost Based Tariffed Rates and Docket No. U-22093: In Re: Review and Consideration of BellSouth Telecommunications, Inc.'s Tariff Filing of April 1, 1996, Filed Pursuant to Section 901 and 1001 of the Regulations for Competition in the Local Telecommunications Market Which Tariff Introduces Interconnection and Unbundled Services and Establishes the Rates, Terms and Conditions for Such Service Offerings (consolidated).

Docket No. U-22145: In the Matter of Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. U-22252: In Re: Consideration and Review of BST's Preapplication Compliance with Section 271 of the Telecommunications Act of 1996, including but not limited to the fourteen requirements set forth in Section 271 (c) (2) (b) in order to verify compliance with section 271 and provide a recommendation to the FCC regarding BST's application to provide interLATA services originating in-region.

Docket No. U-20883 Subdocket A: In Re: Submission of the Louisiana Public Service Commission's Forward Looking Cost Study to the FCC for Purposes of Calculating Federal Universal Service Support.

Docket No. U-24206: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. U-22632: In Re: BellSouth Telecommunications, Inc. Filing of New Cost Studies for Providing Access Line Service for Customer Provided Public Telephones and Smartline Service for Public Telephone Access.

Docket No. Docket No. U-24714-A: In Re: Final Deaveraging of BellSouth Telecommunications, Inc. UNE Rates Pursuant to FCC 96-45 Ninth Report and Order and Order on Eighteenth Order on Reconsideration Released November 2, 1999.

Docket No. U-27571: In Re: Louisiana Public Service Commission Implementation of the Requirements Arising from The Federal Communications Commission's Triennial Review Order, Order 03-36: Unbundled Local Circuit Switching for Mass Market Customers and Establishment of a Batch Cut Migration Process.

Public Service Commission of Maryland

Case 8584, Phase II: In the Matter of the Application of MFS Intelenet of Maryland, Inc. for Authority to Provide and Resell Local Exchange and Intrastate Telecommunications Services in Areas Served by C&P Telephone Company of Maryland.

Case 8715: In the Matter of the Inquiry into Alternative Forms of Regulating Telephone Companies.

Case 8731: In the Matter of the Petitions for Approval of Agreements and Arbitration of Unresolved Issues Arising Under Section 252 of the Telecommunications Act of 1996.

Massachusetts Department of Telecommunications and Energy

D.P.U./D.T.E. 97088/97-18 (Phase II): Investigation by the Department of Telecommunications & Energy on its own motion regarding (1) implementation of section 276 of the Telecommunications Act of 1996 relative to public interest payphones, (2) Entry and Exit Barriers for the Payphone Marketplace, (3) New England Telephone and Telegraph Company d/b/a NYNEX's Public Access Smart-Pay Service, and (4) the rate policy for operator service providers.

Michigan Public Service Commission

Case No. U-14781: In the matter on the Commission's Own Motion to examine the total service long run incremental costs of the Michigan Exchange Carriers Association Companies, including Ace Telephone Company, Barry County Telephone Company, Deerfield Farmers' Telephone Company, Kaleva Telephone Company, Lennon telephone Company, Ogden telephone Company, Pigeon Telephone Company, Upper Peninsula Telephone Company, and Waldron Telephone Company.

Minnesota Public Utilities Commission

PUC Docket No. PT6153/AM-02-686, OAH Docket No. 3-2500-14980-2: In the Matter of Petition of Midwest Wireless Communications, LLC for Designation as an Eligible Communications carrier under 47 U.S.C. § 214(e)(2).

PUC Docket No. PT-6182, 6181/M-02-1503: In the Matter of RCC Minnesota, Inc. and Wireless Alliance, LLC for Designation as an Eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2).

Mississippi Public Service Commission

Docket No. U-5086: In Re: MCI Telecommunications Corporation's Metered Use Service Option D (Prism I) and Option E (Prism II).

Docket No. U-5112: In Re: MCI Telecommunications Corporation's Metered Use Option H (800 Service).

Docket No. U-5318: In Re: Petition of MCI for Approval of MCI's Provision of Service to a Specific Commercial Banking Customers for Intrastate Interexchange Telecommunications Service.

Docket 89-UN-5453: In Re: Notice and Application of South Central Bell Telephone Company for Adoption and Implementation of a Rate Stabilization Plan for its Mississippi Operations.

Docket No. 90-UA-0280: In Re: Order of the Mississippi Public Service Commission Initiating Hearings Concerning (1) IntraLATA Competition in the Telecommunications Industry and (2) Payment of Compensation by Interexchange Carriers and Resellers to Local Exchange Companies in Addition to Access Charges.

Docket No. 92-UA-0227: In Re: Order Implementing IntraLATA Competition.

Docket No. 96-AD-0559: In Re: In the Matter of the Interconnection Agreement Negotiations Between AT&T Communications of the South Central States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 98-AD-035: Universal Service.

Docket No. 97-AD-544: In Re: Generic Proceeding to Establish Permanent Prices for BellSouth Interconnection and Unbundled Network Elements.

Docket No. 2003-AD-714: Generic Proceeding to Review the Federal Communications Commission's Triennial Review Order.

Public Service Commission of the State of Missouri

Case No. TO-2004-0527: In the Matter of the Application of WWC License, LLC, d/b/a CellularOne, for Designation as an Eligible Telecommunications Carrier, and Petition for Redefinition of Rural Telephone Company Areas.

Case No. to-2005-0384: Application of USCOC of Greater Missouri, LLC For Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996.

Public Service Commission of the State of Montana

Docket No. D2000.8.124: In the Matter of Touch America, Inc.'s Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 of the Terms and Conditions of Interconnection with Qwest Corporation, f/k/a US West Communications, Inc.

Docket No. D2000.6.89: In the Matter of Qwest Corporation's Application to Establish Rates for Interconnection, Unbundled Network Elements, Transport and Termination, and Resale Services.

Docket No. D2003.1.14: In the Matter of WWC Holding Co. Application for Designation as an Eligible Telecommunications Carrier in Montana Areas Served by Qwest Corporation.

Docket No. D2007.7.86: In the Matter of the Filing of a Notice of the Making of a Bona Fide Request for Interconnection with Ronan Telephone Company by Gold Creek Cellular of Montana Limited Partnership and Verizon Wireless LLC Both d/b/a Verizon Wireless Pursuant to 47 U.S.C. §§251 and 252 and §69-3-834, MCA; and Docket No. D.2007.7.87: In the Matter of the Filing of a Notice of the Making of a Bona Fide Request for Interconnection with Hot Springs Telephone Company by Gold Creek Cellular of Montana Limited Partnership and Verizon Wireless LLC Both d/b/a Verizon Wireless Pursuant to 47 U.S.C. §§251 and 252 and §69-3-834, MCA (consolidated).

Nebraska Public Service Commission

Docket No. C-1385: In the Matter of a Petition for Arbitration of an Interconnection Agreement Between AT&T Communications of the Midwest, Inc., and US West Communications, Inc.

Application No. C-3324: In the Matter of the Petition of N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless for designation as an Eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2).

Docket No. 3725: In the Matter of Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier Pursuant To Section 214(e)(2) of the Communications Act of 1934.

Application No. C-4302: In the Matter of the Application of Celco Partnership and its Subsidiaries and Affiliates to Amend Eligible Telecommunications Carrier Designation in the State of Nebraska.

Public Utilities Commission of Nevada

Docket No. 04-3030: In re: Application of WWD License LLC, d/b/a CellularOne, for redefinition of its service area as a designated Eligible Telecommunications Carrier.

Docket No. 08-12017: In the Matter of Commnet of Nevada, LLC, Application for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Federal Universal Service Support.

Docket No. 10-09007: Application of Cellco Partnership and its Subsidiaries and Affiliates to Amend Eligible Telecommunications Carrier Designation in the State of Nevada.

New Jersey Board of Public Utilities

Docket No. TM0530189: In the Matter of the Joint Petition of Verizon Communications Inc., and MCI, Inc. for Approval of Merger.

New Mexico Public Regulation Commission

Case No. 10-00315-UT: In the Matter of the Application of Sacred Wind Communications, Inc., for Approval of Initial Rates, Terms and Conditions of Service for Support from the New Mexico Rural Universal Service Fund and Petition for Variance from Commission Rules.

New York Public Service Commission

Case No. 28425: Proceeding on Motion of the Commission as to the Impact of the Modification of Final Judgement and the Federal Communications Commission's Docket 78-72 on the Provision of Toll Service in New York State.

North Carolina Public Utilities Commission

Docket No. P-100, Sub 72: In the Matter of the Petition of AT&T to Amend Commission Rules Governing Regulation of Interexchange Carriers (Comments).

Docket No. P-141, Sub 19: In the Matter of the Application of MCI Telecommunications Corporation to Provide InterLATA Facilities-Based Telecommunications Services (Comments).

Docket No. P-55, Sub 1013: In the Matter of Application of BellSouth Telecommunications, Inc. for, and Election of, Price Regulation.

Docket Nos. P-7, Sub 825 and P-10, Sub 479: In the Matter of Petition of Carolina Telephone and Telegraph and Central Telephone Company for Approval of a Price Regulation Plan Pursuant to G.S. 62-133.5.

Docket No. P-19, Sub 277: In the Matter of Application of GTE South Incorporated for and Election of, Price Regulation.

Docket No. P-141, Sub 29: In the Matter of: Petition of MCI Telecommunications Corporation for Arbitration of Interconnection with BellSouth Telecommunications, Inc., Petition of AT&T Communications of the Southern States, Inc. for Arbitration of Interconnection with BellSouth Telecommunications, Inc. (consolidated).

Docket No. P-141, Sub 30: In the Matter of: Petition of MCI Telecommunications Corporation for Arbitration of Interconnection with General Telephone Company of North Carolina, Inc., Petition of AT&T

Communications of the Southern States, Inc. for Arbitration of Interconnection with General Telephone Company of North Carolina, Inc. (consolidated).

Docket No. P-100, Sub 133b: Re: In the Matter of Establishment of Universal Support Mechanisms Pursuant to Section 254 of the Telecommunications Act of 1996.

Docket No. P-100, Sub 133d: Re: Proceeding to Determine Permanent Pricing for Unbundled Network Elements.

Docket No. P-100, Sub 84b: Re: In the Matter of Petition of North Carolina Payphone Association for Review of Local Exchange Company Tariffs for Basic Payphone Services (Comments).

Docket No. P-561, Sub 10: BellSouth Telecommunications, Inc., Complainant, v. US LEC of North Carolina, LLC, and Metacomm, LLC, Respondents.

Docket No. P-472, Sub 15: In the Matter of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Time Warner Telecom of North Carolina, L.P. Pursuant to Section 252(b) of the Telecommunications Act of 1996.

Docket Nos. P-7, Sub 995; P-10, Sub 633: ALEC., Inc. v. Carolina Telephone and Telegraph Company and Central Telephone Company.

Docket No. P-500, Sub 18: In the Matter of: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. P-118, Sub 30: In the matter of: Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration Pursuant to Section 252 of the Telecommunications Act of 1996.

Docket No. P-100, Sub 133q: In Re: Implementation of Requirements Arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers.

Public Utilities Commission of Ohio

Case No. 93-487-TP-ALT: In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation.

Case No. 05-0269-TP-ACO: In the matter of the Joint Application of SBC Communications, Inc. and AT&T Corp. for Consent and Approval of a Change of Control.

Oklahoma Corporation Commission

Cause No. PUD 01448: In the Matter of the Application for an Order Limiting Collocation for Special Access to Virtual or Physical Collocation at the Option of the Local Exchange Carrier.

Cause No. PUD 200300195: Application of United States Cellular Corporation for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996.

Cause No. PUD 200300239: Application of Dobson Cellular Systems, Inc. for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996.

Cause No. PUD 200500122: In the matter of Dobson Cellular Systems, Inc., and American Cellular Corporation application for designation as a competitive eligible telecommunications carrier and redefinition of the service area requirement pursuant to Section 214(e) of the Telecommunications Act of 1996.

Public Utility Commission of Oregon

Docket No. UT 119: In the Matter of an Investigation into Tariffs Filed by US West Communications, Inc., United Telephone of the Northwest, Pacific Telecom, Inc., and GTE Northwest, Inc. in Accordance with ORS 759.185(4).

Docket No. ARB 3: In the Matter of the Petition of AT&T Communications of the Pacific Northwest, Inc., for Arbitration of Interconnection Rates, Terms, and Conditions Pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of 1996. Docket No. ARB 6: In the Matter of the Petition of MCIMetro Access Transmission Services, Inc. for Arbitration of Interconnection Rates, Terms, and Conditions Pursuant to 47 U.S.C. § 252(b) of the Telecommunications Act of 1996 (consolidated).

Docket No. ARB 9: In the Matter of the Petition of an Interconnection Agreement Between MCIMetro Access Transportation Services, Inc. and GTE Northwest Incorporated, Pursuant to 47 U.S.C. Section 252.

Docket No. UT-125: In the Matter of the Application of US West Communications, Inc. for an Increase in Revenues.

Docket No. UM 1083: RCC Minnesota, Inc. Application for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996.

Docket No. UM 1084: United States Cellular Corporation Application for Designation as an Eligible Telecommunications Carrier, Pursuant to the Telecommunications Act of 1996.

Docket No. UM 1217: Staff Investigation to Establish Requirements for Initial Designation and Recertification of Telecommunications Carriers Eligible to Receive Federal Universal Service Support.

Pennsylvania Public Utilities Commission

Docket No. I-00910010: In Re: Generic Investigation into the Current Provision of InterLATA Toll Service.

Docket No. P-00930715: In Re: The Bell Telephone Company of Pennsylvania's Petition and Plan for Alternative Form of Regulation under Chapter 30.

Docket No. R-00943008: In Re: Pennsylvania Public Utility Commission v. Bell Atlantic-Pennsylvania, Inc. (Investigation of Proposed Promotional Offerings Tariff).

Docket No. M-00940587: In Re: Investigation pursuant to Section 3005 of the Public Utility Code, 66 Pa. C. S. §3005, and the Commission's Opinion and Order at Docket No. P-930715, to establish standards and safeguards for competitive services, with particular emphasis in the areas of cost allocations, cost studies, unbundling, and imputation, and to consider generic issues for future rulemaking.

Docket No. A-310489F7004: Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration Pursuant to Section 252 of the Telecommunications Act of 1996.

Docket Nos. A-310580F9, A-310401F6, A-310407F3, A-312025F5, A-310752F6, A-310364F3: Joint Application of Verizon Communications Inc. and MCI, Inc. for Approval of Agreement and Plan of Merger.

South Carolina Public Service Commission

Docket No. 90-626-C: In Re: Generic Proceeding to Consider Intrastate Incentive Regulation.

Docket No. 90-321-C: In Re: Petition of Southern Bell Telephone and Telegraph Company for Revisions to its Access Service Tariff Nos. E2 and E16.

Docket No. 88-472-C: In Re: Petition of AT&T of the Southern States, Inc., Requesting the Commission to Initiate an Investigation Concerning the Level and Structure of Intrastate Carrier Common Line (CCL) Access Charges.

Docket No. 92-163-C: In Re: Position of Certain Participating South Carolina Local Exchange Companies for Approval of an Expanded Area Calling (EAC) Plan.

Docket No. 92-182-C: In Re: Application of MCI Telecommunications Corporation, AT&T Communications of the Southern States, Inc., and Sprint Communications Company, L.P., to Provide IntraLATA Telecommunications Services.

Docket No. 95-720-C: In Re: Application of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company for Approval of an Alternative Regulation Plan.

Docket No. 96-358-C: In Re: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc. and BellSouth Telecommunications, Inc., Pursuant to 47 U.S.C. § 252.

Docket No. 96-375-C: In Re: Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc. and GTE South Incorporated Pursuant to 47 U.S.C. § 252.

Docket No. 97-101-C: In Re: Entry of BellSouth Telecommunications, Inc. into the InterLATA Toll Market.

Docket No. 97-374-C: In Re: Proceeding to Review BellSouth Telecommunications, Inc. Cost for Unbundled Network Elements.

Docket No. 97-239-C: Intrastate Universal Service Fund.

Docket No. 97-124-C: BellSouth Telecommunications, Inc. Revisions to its General Subscriber Services Tariff and Access Service Tariff to Comply with the FCC's Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996.

Docket No. 1999-268-C: Petition of Myrtle Beach Telephone, LLC, for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Horry Telephone Cooperative, Inc.

Docket No. 1999-259-C: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996.

Docket No. 2001-65-C: Generic Proceeding to Establish Prices for BellSouth's Interconnection Services, Unbundled Network Elements and Other Related Elements and Services.

Docket No. 2003-326-C: In Re: Implementation of Requirements Arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers.

Docket No. 2003-227-C: Application of Hargray Wireless, LLC for Designation as an Eligible Telecommunications Carrier under 47 U.S.C. 214(e)(2).

South Dakota Public Utilities Commission

Docket No. TC03-191: In the Matter of the Filing by WWC License, LLC d/b/a CellularOne for Designation as an Eligible Telecommunications Carrier in Other Rural Areas.

Docket No. TC03-193: In the Matter of the Petition of RCC Minnesota, Inc., and Wireless Alliance, L.L.C., for Designation as an Eligible Telecommunications Carrier under 47 U.S.C. §214(e)(2).

Docket No. TC10-090: In the Matter of the Petition of Celco Partnership and Its Subsidiaries and Affiliates to Amend and Consolidate Eligible Telecommunications Carrier Designations in the State of South Dakota and to Partially Relinquish ETC Designation.

Tennessee Public Service Commission

Docket No. 90-05953: In Re: Earnings Investigation of South Central Bell Telephone Company.

Docket Nos. 89-11065, 89-11735, 89-12677: AT&T Communications of the South Central States, MCI Telecommunications Corporation, US Sprint Communications Company -- Application for Limited IntraLATA Telecommunications Certificate of Public Convenience and Necessity.

Docket No. 91-07501: South Central Bell Telephone Company's Application to Reflect Changes in its Switched Access Service Tariff to Limit Use of the 700 Access Code.

Tennessee Regulatory Authority

Docket No. 96-01152: In Re: Petition by AT&T Communications of the South Central States, Inc. for Arbitration under the Telecommunications Act of 1996 and Docket No. 96-01271: In Re: Petition by MCI Telecommunications Corporation for Arbitration of Certain Terms and Conditions of a Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996 (consolidated).

Docket No. 96-01262: In Re: Interconnection Agreement Negotiations Between AT&T of the South Central States, Inc. and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252.

Docket No. 97-01262: Proceeding to Establish Permanent Prices for Interconnection and Unbundled Network Elements.

Docket No. 97-00888: Universal Service Generic Contested Case.

Docket No. 99-00430: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996.

Docket No. 97-00409: In Re: All Telephone Companies Tariff Filings Regarding Reclassification of Pay Telephone Service as Required by Federal Communications Commission Docket No. 96-128.

Docket No. 03-00119: In Re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc.

Docket No. 03-00491: In Re: Implementation of Requirements Arising from Federal Communications Commission Triennial UNE Review: Local Circuit Switching for Mass Market Customers.

Docket No. 06-00093: In Re: Joint Filing of AT&T, Inc., BellSouth Corporation, and BellSouth's Certified Tennessee Subsidiaries Regarding Change of Control.

Public Utility Commission of Texas

Docket No. 12879: Application of Southwestern Bell Telephone Company for Expanded Interconnection for Special Access Services and Switched Transport Services and Unbundling of Special Access DS1 and DS3 Services Pursuant to P. U. C. Subst. R. 23.26.

Docket No. 18082: Complaint of Time Warner Communications against Southwestern Bell Telephone Company.

Docket No. 21982: Proceeding to Examine Reciprocal Compensation Pursuant to Section 252 of the Federal Telecommunications Act of 1996.

Docket No. 23396: Joint Petition of CoServ, LLC d/b/a CoServ Communications and Multitechnology Services, LP d/b/a CoServ Broadband Services for Arbitration of Interconnection Rates, Terms, Conditions, and Related Arrangements with Southwestern Bell Telephone Company.

Docket No. 24015: Consolidated Complaints and Requests of Post-Interconnection Dispute Resolution Regarding Inter-Carrier Compensation for FX-Type Traffic Against Southwestern Bell Telephone Company.

PUC Docket No. 27709: Application of NPCR, Inc., dba Nextel Partners for Eligible Telecommunications Carrier Designation (ETC).

PUC Docket No. 28744: Impairment Analysis for Dedicated Transport.

PUC Docket No. 28745: Impairment Analysis for Enterprise Loops.

PUC Docket No. 29144: Application of Dobson Cellular Systems, Inc., for Designation as an Eligible Telecommunications Carrier (ETC) pursuant to 47 U.S.C. 241 (e) and P.U. C. Subst. Rule 26.418.

State of Vermont Public Service Board

Docket No. 6533: Application of Verizon New England Inc. d/b/a Verizon Vermont for a Favorable Recommendation to Offer InterLATA Services Under 47 U.S.C. 271.

Docket No. 6882: Investigation into Public Access Line Rates of Verizon New England, Inc., d/b/a Verizon Vermont.

Docket No. 6934: Petition of RCC Atlantic Inc. for designation as an Eligible Telecommunications Carrier in areas served by rural telephone companies under the Telecommunications Act of 1996.

Virginia State Corporation Commission

Case No. PUC920043: Application of Virginia Metrotel, Inc. for a Certificate of Public Convenience and Necessity to Provide InterLATA Interexchange Telecommunications Services.

Case No. PUC920029: Ex Parte: In the Matter of Evaluating the Experimental Plan for Alternative Regulation of Virginia Telephone Companies.

Case No. PUC930035: Application of Contel of Virginia, Inc. d/b/a GTE Virginia to implement community calling plans in various GTE Virginia exchanges within the Richmond and Lynchburg LATAs.

Case No. PUC930036: Ex Parte: In the Matter of Investigating Telephone Regulatory Methods Pursuant to Virginia Code § 56-235.5, & Etc.

Case No. PUC-200540051: Application of Verizon Communications Inc. and MCI, Inc. for approval of Agreement and Plan of Merger resulting in the indirect transfer of control of MCImetro Access Transmission Services of Virginia, Inc., to Verizon Communications Inc.

Washington Utilities and Transportation Commission

Docket Nos. UT-941464, UT-941465, UT-950146, and UT-950265 (Consolidated): Washington Utilities and Transportation Commission, Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle and Digital Direct of Seattle, Inc., Complainant, vs. US West Communications, Inc., Respondent; TCG Seattle, Complainant, vs. GTE Northwest Inc., Respondent; Electric Lightwave, Inc., vs. GTE Northwest, Inc., Respondent.

Docket No. UT-950200: In the Matter of the Request of US West Communications, Inc. for an Increase in its Rates and Charges.

Docket No. UT-000883: In the Matter of the Petition of U S West Communications, Inc. for Competitive Classification.

Docket No. UT-050814: In the Matter of the Joint Petition of Verizon Communications Inc., and MCI, Inc. for a Declaratory Order Disclaiming Jurisdiction Over or, in the Alternative a Joint Application for Approval of, Agreement and Plan of Merger.

Public Service Commission of West Virginia

Case No. 02-1453-T-PC: Highland Cellular, Inc. Petition for consent and approval to be designated as an eligible telecommunications carrier in the areas served by Citizens Telecommunications Company of West Virginia.

Case No. 03-0935-T-PC: Easterbrooke Cellular Corporation Petition for consent and approval to be designated as an eligible telecommunications carrier in the area served by Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia.

Public Service Commission of Wyoming

Docket No. 70000-TR-95-238: In the Matter of the General Rate/Price Case Application of US West Communications, Inc. (Phase I).

Docket No. PSC-96-32: In the Matter of Proposed Rule Regarding Total Service Long Run Incremental Cost (TSLRIC) Studies.

Docket No. 70000-TR-98-420: In the Matter of the Application of US West Communications, Inc. for authority to implement price ceilings in conjunction with its proposed Wyoming Price Regulation Plan for essential and noncompetitive telecommunications services (Phase III).

Docket No. 70000-TR-99-480: In the Matter of the Application of US West Communications, Inc. for authority to implement price ceilings in conjunction with its proposed Wyoming Price Regulation Plan for essential and noncompetitive telecommunications services (Phase IV).

Docket No. 70000-TR-00-556: In the Matter of the Filing by US West Communications, Inc. for Authority to File its TSLRIC 2000 Annual Input Filing and Docket No. 70000-TR-00-570: In the Matter of the Application of US West Communications, Inc. for Authority to File its 2000 Annual TSLRIC Study Filing.

Docket No. 70042-AT-04-4: In the Matter of the Petition of WWC Holding Co., Inc., d/b/a CellularOne for Designation as an Eligible Telecommunications Carrier in Areas Served by Qwest Corporation, and Docket No. 70042-AT-04-5: In the Matter of the Petition of WWC Holding Co., Inc., d/b/a CellularOne for

Designation as an Eligible Telecommunications Carrier in Clark, Basin, Frannie, Greybull, Lovell, Meeteetse, Burlington, Hyattville, and Tensleep (consolidated).

Public Service Commission of the District of Columbia

Formal Case No. 814, Phase IV: In the Matter of the Investigation into the Impact of the AT&T Divestiture and Decisions of the Federal Communications Commission on Bell Atlantic - Washington, D. C. Inc.'s Jurisdictional Rates.

Puerto Rico Telecommunications Regulatory Board

Case No. 98-Q-0001: In Re: Payphone Tariffs.

Case No. JRT-2001-AR-0002: In the Matter of Interconnection Rates, Terms and Conditions between WorldNet Telecommunications, Inc. and Puerto Rico Telephone Company.

Case No. JRT-2003-AR-0001: Re: Petition for Arbitration pursuant to Section 252(b) of the Federal Communications Act, and Section 5(b), Chapter II of the Puerto Rico Telecommunications Act, regarding interconnection rates, terms, and conditions.

Case No. JRT-2004-Q-0068: Telefónica Larga Distancia de Puerto Rico, Inc., Complainant, v. Puerto Rico Telephone Company, Defendant.

Case Nos. JRT-2005-Q-0121 and JRT-2005-Q-0218: Telefónica Larga Distancia de Puerto Rico, Inc., and WorldNet Telecommunications, Inc., Plaintiffs, v. Puerto Rico Telephone Company, Inc., Defendant.

Case No. JRT-2010-AR-0001: In the Matter of WorldNet Telecommunications, Inc., Petition for arbitration pursuant to Section 47 U.S.C. 252(b) of the Federal Communications Act and Section 5(b), Chapter III, of the Puerto Rico Telecommunications Act, regarding interconnection rates, terms, and conditions with Puerto Rico Telephone Company.

COMMENTS/DECLARATIONS - FEDERAL COMMUNICATIONS COMMISSION

CC Docket No. 92-91: In the Matter of Open Network Architecture Tariffs of Bell Operating Companies.

CC Docket No. 93-162: Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access.

CC Docket No. 91-141: Common Carrier Bureau Inquiry into Local Exchange Company Term and Volume Discount Plans for Special Access.

CC Docket No. 94-97: Review of Virtual Expanded Interconnection Service Tariffs.

CC Docket No. 94-128: Open Network Architecture Tariffs of US West Communications, Inc.

CC Docket No. 94-97, Phase II: Investigation of Cost Issues, Virtual Expanded Interconnection Service Tariffs.

CC Docket No. 96-98: In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996.

CC Docket No. 97-231: Application by BellSouth to Provide In-Region InterLATA Services.

CC Docket No. 98-121: Application by BellSouth to Provide In-Region InterLATA Services.

CCB/CPD No. 99-27: In the Matter of Petition of North Carolina Payphone Association for Expedited Review of, and/or Declaratory Ruling Concerning, Local Exchange Company Tariffs for Basic Payphone Services.

CC Docket No. 96-128: In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CCB/CPD No. 99-31: Oklahoma Independent Telephone Companies Petition for Declaratory Ruling (consolidated).

CCB/CPD No. 00-1: In the Matter of the Wisconsin Public Service Commission Order Directing Filings.

CC Docket No. 99-68: In the Matter of Inter-Carrier Compensation for ISP-Bound Traffic.

File No. EB-01-MD-020: In the Matter of Sprint Communications Company, L.P., Complainant v. Time Warner Telecom, Inc. Defendant.

WC Docket No. 03-225: Request by the American Public Communications Council that the Commission Issue a Notice of Proposed Rulemaking to Update the Dial-Around Compensation Rate.

File Nos. EB-02-MD-018-030: In the Matter of Communications Vending Corp. of Arizona, et. al., Complainants, v. Citizens Communications Co. f/k/a Citizens Utilities Co. and Citizens Telecommunications Co., et. al., Defendants.

CC Docket No. 96-45: In the Matter of Federal-State Joint Board on Universal Service, Cellular South License, Inc., RCC Holdings, Inc., Petitions for designation as an Eligible Telecommunications Carrier in the State of Alabama.

CC Docket No. 96-45: In the Matter of Federal-State Joint Board on Universal Service, Declaration in Support of the Comments to the Federal-State Joint Board of the Rural Cellular Association and the Alliance of Rural CMRS Carriers.

WC Docket No. 07-245/GN Docket No. 09-51: In the Matter of Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments.

REPRESENTATIVE TESTIMONY – STATE, FEDERAL, AND OVERSEAS COURTS

Court of Common Pleas, Philadelphia County, Pennsylvania

Shared Communications Services of 1800-80 JFK Boulevard, Inc., Plaintiff, v. Bell Atlantic Properties, Inc., Defendant.

Texas State Office of Administrative Hearings

SOAH Docket No. 473-00-0731: Office of Customer Protection (OCP) Investigation of Axces, Inc. for Continuing Violations of PUC Substantive Rule §26.130, Selection of Telecommunications Utilities, Pursuant to Procedural Rules 22.246 Administrative Penalties.

SOAH Docket No. 473-03-3673: Application of NPCR, Inc., dba Nextel Partners for Eligible Telecommunications Carrier Designation (ETC).

SOAH Docket No. 473-04-4450: Application of Dobson Cellular Systems, Inc., for Designation as an Eligible Telecommunications Carrier (ETC) pursuant to 47 U.S.C. 241 (e) and P.U. C. Subst. Rule 26.418.

Superior Court for the State of Alaska, First Judicial District

Richard R. Watson, David K. Brown and Ketchikan Internet Services, a partnership of Richard R. Watson and David K. Brown, Plaintiffs, v. Karl Amylon and the City of Ketchikan, Defendants.

Superior Court for the State of Alaska, Third Judicial District

Dobson Cellular Systems, Inc., Plaintiff, v. Frontline Hospital, LLC, Defendant.

United States District Court for the Southern District of Iowa, Central Division

Iowa Network Services, Inc., Plaintiff, v. Sprint Communications Company, L.P., Defendant.

United States District Court for the District of Oregon

Time Warner Telecom of Oregon, LLC, and Qwest Communications Corporation, Plaintiffs, v. The City of Portland, Defendant.

United States District Court for the District of South Carolina, Columbia Division

Brian Wesley Jeffcoat, on behalf of himself and others similarly situated, Plaintiffs, v. Time Warner Entertainment - Advance/Newhouse Partnership, Defendant.

United States District Court for the Northern District of Texas, Fort Worth Division

Multitechnology Services, L. P. d/b/a CoServ Broadband Services, Plaintiffs, v. Southwestern Bell Telephone Company, Defendant.

Multitechnology Services, L. P. d/b/a CoServ Broadband Services, Plaintiffs, v. Verizon Southwest f/k/a GTE Southwest Incorporated, Defendant.

High Court of the Hong Kong Special Administrative Region, Court of First Instance

Commercial List No. 229 of 1999: Cable and Wireless HKT International Limited, Plaintiff v. New World Telephone Limited, Defendant.

REPRESENTATIVE TESTIMONY – PRIVATE COMMERCIAL ARBITRATION TRIBUNALS

American Arbitration Association

Southwestern Bell Telephone Company, Claimant vs. Time Warner Telecom, Respondent.

New Access Communications LLC, Choicetel LLC and Emergent Communications LLC, Claimants vs. Qwest Corporation, Respondent (Case No. 77 Y 1818 0031603).

CPR Institute for Dispute Resolution

Supra Telecommunications and Information Systems, Inc., Claimant vs. BellSouth Telecommunications, Inc., Respondent.

RECENT WHITE PAPERS

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Tom Armstrong

EXPERIENCE

4/06 – Present

NATIONAL ALEC ASSOCIATION (NALA)

- Board member - 2007 – present
- Chairman - 2009 – present

5/99 – Present

EXPRESS PHONE SERVICE, INC.

Pensacola, FL

President

- Implemented control processes for accounts receivables and payables
- Created provisioning and billing procedures for 5000+ customers
- Legal and regulatory point of contact for company matters
- Managed transition of company from pre-paid CLEC to Lifeline/Linkup based CLEC

9/78 – 9/98

UNITED STATES MARINE CORPS

Staff Sergeant

United States of America, Japan, Philippines, Panama, Korea

- Honorable Discharge / Military Retirement after 20 years of service
- Awards include Good Conduct, Navy Achievement Medal (Gold Star), Expert Pistol/Rifle qualification
- Designated as Master Training Specialist by United States Navy
- Coordinated Base Realignment and Closure transition of Instructor Training Course from NAS Memphis to NAS Pensacola

EDUCATION

St. Augustine High School

1974 – 1978 Diploma

United States Marine Corps

1979

Basic Electricity & Electronics

Aviation Avionics

Advanced First Term Avionics

1986

Instructor Training Course

1992

Advanced Electronics/Avionics

State Technical Institute of Memphis

1992

Associate of Arts - summa cum laude

Electronic Technology