

REDACTED

BullsEye Interrogatory No. 16

With regard to the settlement of the QCC v. AT&T Lawsuit, identify whether QCC attributed any amount to the State of Florida, on a jurisdictional, tax, accounting, or other basis, and if so identify such amount and the justification therefor.

RESPONSE: QCC objects to this request on the basis that it seeks information protected by attorney client privilege and the work product doctrine. QCC further objects on the basis that the request is not reasonably calculated to lead to the discovery of admissible evidence. The question before the Commission in this docket is whether BullsEye unlawfully discriminated against QCC in its provision of intrastate switched access in Florida. The attribution or allocation of settlement amounts in connection with the AT&T litigation bears no connection to the subject matter of this case. Without waiver of its objects, QCC responds as follows.

[BEGIN CONFIDENTIAL]

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[END CONFIDENTIAL]

Respondent: QCC Legal

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FPSC-COMMISSION CLERK

QCC Responses to BullsEye ROG#19

Records Retention Policies

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QCC Response to BullsEye POD#18

TEOCO Statement of Work

QCC Bates Stamp#003004-#003040

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