

J. Phillip Carver
General Attorney

BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Telephone: 305 347-5558

ORIGINAL
FILED

September 25, 1996

Ms. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

Re: Docket No. 930330-TP and ~~930330-TP~~

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Deposition, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (td)
J. Phillip Carver

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
William J. Ellenberg II

DOCUMENT NUMBER DATE
10276 SEP 25 96
FPSC-RECORDS/REPORTING

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Indiantown, FL 34956

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Atmore, Alabama 36504

Daniel V. Gregory
Quincy Telephone Company
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Quincy, FL 32351

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Vice President
One Call Communications, Inc.
801 Congressional Boulevard
Carmel, Indiana 46032

Angela B. Green
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Florida Public Telecommunications
Assoc.
125 So. Gadsden St., #200
Tallahassee, FL 32302

Benjamin W. Fincher
Attorney, State Regulatory
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Atlanta, GA 30339

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Ervin, Varn, Jacobs, Odom
& Ervin
P.O. Drawer 1170
305 South Gadsden Street
Tallahassee, FL 32302
atty for Sprint

*Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, FL 32301
Attys. for FIXCA

Robin Dunson
1200 Peachtree Street, N.E.
Suite 4038
Atlanta, GA 30309
Atty. for AT&T

Mark Logan
Bryant, Miller & Olive
201 S. Monroe Street
Suite 500
Tallahassee, FL 32301
Atty. for AT&T

J. Phillip Carver (E)

CERTIFICATE OF SERVICE
Docket Nos. 930330-TP and 960658-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand
Delivery and U.S. Mail this 25th of September, 1996 to:

Charles J. Beck
Office of Public Counsel
c/o The Florida Legislature
Suite 812
111 West Madison Street
Tallahassee, FL 32399-1440

*Monica M. Barone, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Cathy Swanson
Central Telephone Company
of Florida
Post Office Box 2214
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John P. Fons
J. Jeffrey Wahlen
Macfarlane, Ausley, Ferguson
& McMullen
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Martha McMillin
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GTE Florida Incorporated
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Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

*Tracy Hatch, Esq.
AT&T
101 North Monroe St., Ste. 700
Tallahassee, FL 32301
(904) 425-6360
atty for AT&T

David B. Erwin
Young, van Assenderp, Varnadoe
& Benton, P.A.
225 South Adams St., Ste. 200
Post Office Box 1833
Tallahassee, FL 32302

Mr. John A. Carroll, Jr.
Northeast Florida Telephone Co.
Post Office Box 485
Macclenny, FL 32063-0485

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

200908
FILE COPY

In re: Complaint of Florida Interexchange Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc., against BellSouth Telecommunications, Inc.) Docket No. 960658-TP) Docket No. 930330-TP) Filed: September 25, 1996)

NOTICE OF DEPOSITION

To: Tracy Hatch
AT&T Communications
101 North Monroe St., Ste. 700
Tallahassee, FL 32301

Notice is hereby give that BellSouth Telecommunications, Inc. will take the depositions of the following named individuals:

Corporate Representative of AT&T of the Southern States, Inc.

The Corporate Representative shall be the person named by AT&T, pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure to provide testimony on behalf of AT&T as to the areas of inquiry set forth on Attachment "A" hereto.

At the following location and time:

October 2, 1996
1:30 PM
2540 Shumard Oak Blvd.
Gunter Building, Room 362
Tallahassee, FL 32399-0850

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (B2)
ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

William J. Ellenberg II (B2)
WILLIAM J. ELLENBERG II
NANCY B. WHITE
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0747

DOCUMENT NUMBER DATE

10276 SEP 25 1996

FPSC-RECORDS/REPORTING

ATTACHMENT "A"

Areas Of Inquiry Designated Pursuant To Rule 1.310, Fla. R. Civ. Proc.

BellSouth will inquire as to the following:

1. The content of the documents attached hereto, including, but not limited to, AT&T's references to "automatically" carrying the "local toll calls" of customers.
2. The process by which the attached documents were developed.
3. To whom correspondence like or similar to the attached documents has been sent; including, but not limited to, whether documents of this sort has been sent to subscribers of telephone service in Florida who are not currently customers of AT&T.
4. Whether AT&T has received complaints of slamming (or of any other impropriety relating to carrier selection) which complaint(s) relate to or involve in any manner receipt by customers of correspondence like or similar to the attached documents.
5. The marketing efforts of AT&T in the State of Florida regarding "local toll calls" including, but not limited to, the practice referred to in the attached letter, whereby AT&T is "automatically" carrying local toll calls.
6. AT&T's residential and business offerings for local toll calls in the State of Florida.



July 16, 1996

[Redacted]

Dear [Redacted]

Thank you for selecting AT&T for your Local Toll calls. We're delighted that you've chosen to expand your AT&T service.

Effective 08/04/96, AT&T Local Toll service is scheduled to be available in your area. Soon you'll automatically get the same unsurpassed quality, reliability, and service on your Local Toll calls that you've come to expect from AT&T.

Once again, thanks for choosing AT&T Local Toll service. And, of course, if you have any questions, please don't hesitate to call us anytime at 1 800 332-9997.

Sincerely,

Mary Ellen Burton

Mary Ellen Burton
Marketing Manager
AT&T In-State Service

State of Florida Department of Transportation

* Savings are off AT&T base residential rates. Qualifying calls and calls eligible for a discount do not include residential calls, 800 and 900 numbers and AT&T Calling Card calls that are not billed to the customer's Main Bill of Account. 800 numbers, calls billed to a local exchange emergency calling card, number calls, 611, 411 and 511 calls, and some AT&T local residential rates apply in any month in which you spend less than \$70 on qualifying AT&T calls. Certain restrictions apply. Subject to billing availability. You must be a residential long distance subscriber to AT&T to receive these discounts.

† Your first selection for your local toll number is free. If you switch again, your local phone company may charge you a fee to do so.

AT&T Service Agreement

Your signature on this form authorizes AT&T to process your order and verify your local phone company of your decision to switch to AT&T for your local toll calling service. Your local telephone company may charge you a fee to switch your local toll service. If so, it will appear on a future telephone bill and AT&T will send you an AT&T Long Distance Certificate to cover the charge in full.

Only one carrier may be designated for your local toll calls.

Your selection of AT&T will apply only to the telephone number(s) listed on the front of this card.

09-06-96 09:46AM

FROM C&EA STATE STAFF

305 577 3827

TO NANCY SIMS

P002/002



P.O. Box 628227
Orlando, FL 32862-8227

**Get big advantages
over BellSouth.
Choose AT&T to carry your
local toll calls today.**

Dear Valued AT&T Customer:

Recently, the Public Utilities Commission of Florida approved legislation for you to choose who carries your local toll calls—calls outside your local calling area but still not long distance. Until now, these calls were automatically handled by BellSouth.

Now when you choose AT&T, you can get the same great quality and savings on your local toll calls that you already receive on your long distance. Plus, some great advantages over BellSouth. And AT&T can carry these calls automatically—just like we do your long distance.

The billing advantage.

AT&T bills in precise 1-second increments after the first 30 seconds, so you only pay for the time you spend talking or faxing. (With BellSouth, you're billed in 6-second increments.)

Plus, you can save even more, because AT&T Business Service gives you a 10% discount when you spend just \$25 a month on AT&T calls.

The no-fee advantage.

Another advantage of AT&T is that we cover your fees. As you know, we credit you the nominal AT&T Business Service \$5 monthly fee whenever you spend just \$25 a month. (With BellSouth's MINIMUM MONTHLY SETTLEMENT, you're automatically charged for two hours worth of calls. That's \$18.60 a month—no matter how few calls you make—even when you don't make any calls at all.)* Plus, we also credit you the BellSouth charge to switch your local toll service to AT&T.

Why wait? Give your business the AT&T local toll call advantage. Call 1 800 222-0400 today (press 1, then 3), or simply fill out the reply card and mail it back to us.

Sincerely,

Bill Bright

Bill Bright
Florida Marketing Manager, AT&T In-State Services



This map is divided into 10 calling areas. When making local toll calls within your area, you can now use AT&T automatically.

*Based on average business call length and typical business call mileage distribution and BellSouth Wackover Option 1 rates in effect 5-1-96.
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FL8350 1

YES. Add local toll calls to my AT&T service.

I authorize AT&T to act as my agent to switch my local toll service to AT&T and to notify BellSouth of my decision to change to AT&T local toll service. My selection of AT&T will apply only to the Billed Telephone Numbers (BTNs) listed and written on this card and all

[Redacted BTNs]

Rivleah, FL [Redacted]



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FL8350 1

Working Telephone Numbers (WTNs) assigned to the BTNs. I also understand that BellSouth may charge me a fee to switch my local toll service to AT&T.

Thank you for choosing AT&T.

Please make any corrections to your name, address, and phone number below.



Name _____

Address _____

City _____ State _____ ZIP _____

Phone Number _____

Signature _____ Date _____

