

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:) **DOCKET NO. 050863-TP**
)
dPi Teleconnect, L.L.C. v.)
BellSouth Telecommunications, Inc.)

CROSS NOTICE OF DEPOSITION

To the parties who have appeared in the above cause of action, and their attorneys of record:

YOU ARE NOTIFIED that on Tuesday, September 18, 2007, at 9:30 a.m. or immediately following the deposition of Brian Bolinger, Plaintiff dPi Teleconnect, LLC, will take the oral deposition of Pam Tipton, designated representative of Defendant BellSouth Telecommunications, Inc., at Betty Easley Conference Center, 4075 Esplanade Way, Tallahassee, Florida. The deposition will continue from day to day until completed.

dPi Teleconnect, LLC, intends to examine deponent about the following matters at deposition:

- Pam Tipton's background and qualification;
- Pam Tipton's testimony in previous cases;
- Promotions offered BellSouth/AT&T Florida's end users since January 1, 2002;
- Promotions and promotional credits sought by dPi Teleconnect, LLC, whether denied or not since January 1, 2002, including reasons for denial;
- Promotions and promotional credits sought by CLECs other than dPi Teleconnect, LLC, since January 1, 2002;
- Qualifying criteria for promotions;
- Pre-filed testimony and rebuttal testimony of Pam Tipton in the above styled cause, including attached exhibits;
- Pricing and billing of BellSouth/AT&T Florida's end users, including amounts billed end users for basic service plus two blocks (repeat dialing block, call tracing block, and call return block);
- All legal and factual theories of BellSouth/AT&T Florida in this cause; and
- Internal training, billing dispute and crediting policies of BellSouth/AT&T Florida since January 1, 2002.

The Proof of Service attached to this notice contains a list of the parties and attorneys on whom this notice has been served.

Respectfully Submitted,

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/s/ Chris Malish

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CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing document has been served upon Defendant BellSouth through its below-listed attorneys on this 17th day of September, 2007.

/s/ Chris Malish
Christopher Malish

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