

Eric Fryson

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Tuesday, February 14, 2012 4:28 PM
To: Filings@psc.state.fl.us
Subject: 110087-TP AT&T Florida's Privilege Log

Importance: High

Attachments: Document.pdf



Document.pdf
(960 KB)

A. Vickie Woods
BellSouth Telecommunications, LLC d/b/a AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5560
vf1979@att.com<mailto:vf1979@att.com>

B. Docket No.: 110087-TP: 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.

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida
on behalf of Suzanne L. Montgomery

D. 4 pages total (includes letter, pleading and certificate of service)

E. BellSouth Telecommunications, LLC d/b/a AT&T Florida's Privilege Log

.pdf

RECEIVED

DOCUMENT NUMBER DATE

00860 FEB 14 2012

FPSC-COMMISSION CLERK



Suzanne L. Montgomery
General Attorney - Florida

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February 14, 2012

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

Re: Docket No. 110087-TP: 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.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Privilege Log, which we ask that you file in the captioned docket.

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

Sincerely,


Suzanne L. Montgomery

cc: All Parties of Record
Gregory R. Follensbee

1020538

DOCUMENT NUMBER-DATE
00860 FEB 14 2012
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CERTIFICATE OF SERVICE
Docket No. 110087-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (*)Federal Express and First Class U.S. Mail this 14th day of February, 2012 to the following:

Lee Eng Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Express Phone Service
Mr. Tom Armstrong
1803 West Fairfield Drive, Unit 1
Pensacola, FL 32501-1040
Tel. No.: (850) 291-6415
Fax No.: (850) 308-1151
tom@dei.gccoxmail.com

Keefe Law Firm
Vicki Gordon Kaufman (+) (*)
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Tel. No.: 850-681-3828
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vkaufman@kaqmlaw.com
Atty. for Express Phone

Mark Foster
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Austin, Texas 78701
Tel. No.: (512) 708-8700
Fax. No.:(512) 697-0058
mark@mfoosterlaw.com
Atty. for Express Phone


Suzanne L. Montgomery

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Notice of the Adoption of existing) Docket No. 110087-TP
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.)
_____) Filed: February 14, 2012

AT&T FLORIDA'S PRIVILEGE LOG

BellSouth Telecommunications, LLC d/b/a AT&T Florida hereby files its Privilege Log in response to Express Phone Service Inc.'s ("Express Phone") First Request for Production Nos. 2, 3, 7 and 8. AT&T Florida objects to the production of the following documents on the basis of the attorney-client privilege.

1. October 18, 2011 email and attachment from Kristen Shore to Cynthia Malone, Esq., Thomas Pajda, Esq., Lashana Evans, William Greenlaw and Gay Dilz (all AT&T employees) regarding proposed changes to adoption request form.
2. October 18, 2011 email and attachment from Cynthia Malone, Esq. to Thomas Pajda, Esq., Lashana Evans, Kristen Shore, Gay Dilz and William Greenlaw (all AT&T employees) regarding draft Section 252(i) Adoption Request form.
3. October 19, 2011 email and attachment from Lashana Evans to Cynthia Malone, Esq., Thomas Padja, Esq., Kristen Shore, Gay Dilz, and William Greenlaw (all AT&T employees) regarding proposed changes to adoption request form.
4. Draft Section 252(i) Adoption Request form containing comments and review of Cynthia Malone, Esq.
5. Portions of email discussion dated April 14, 2011 and April 18, 2011 between Cynthia Malone, Esq., and Kristen Shore, William Greenlaw, Tricia Pellerin, Gay Dilz, and Tonya Burgess (all AT&T employees) regarding MFN policy.
6. December 6, 2002 memorandum from Amy Wagner, Esq. regarding "Most-Favored Nation ("MFN")" (this was attached to redacted email discussion referenced above).
7. February 24, 2011 legal memorandum regarding reasonable period of time for MFN adoptions.

DOCUMENT NUMBER-DATE
00860 FEB 14 2012
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Respectfully submitted this 14th day of February, 2012.

AT&T FLORIDA



Suzanne L. Montgomery

Authorized House Counsel No. 94116

Tracy W. Hatch

c/o Gregory R. Follensbee

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