

QGC Response to DeltaCom Interrogatory #1

Overcharge Analysis Summary

****REDACTED****

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COM _____
APA _____
ECR _____
GCD | _____
HAD _____
SRC _____
ADM _____
OPC _____
CLK _____

RECEIVED BY MAIL ROOM DATE

03532 MAY 31 20

FPSC-COMMISSION CLERK

REDACTED

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

DeltaCom Request for Production No. 1

Provide all monthly billing disputes for Florida intrastate switched access services based on QCC's claims in this proceeding which QCC filed with DeltaCom.

RESPONSE: QCC objects on the basis that this Request is overly broad, unduly burdensome, vague, ambiguous and seeks information already in DeltaCom's possession or custody. QCC further objects on the basis that the Request is not reasonably calculated to lead to the discovery of admissible evidence. As the provider subject to a statutory non-discrimination obligation, DeltaCom had the obligation to provide identical rate treatment to QCC for the identical service given that QCC is similarly situated to AT&T and Sprint in the context of this service. As an IXC, QCC is provided switched access by over 700 CLECs nationwide. Even setting aside that DeltaCom kept its switched access discount agreement secret, it was not QCC's responsibility to police the conduct of 700+ different CLECs or to lodge billing disputes in order to obtain non-discriminatory treatment.

Without waiver of its objections, QCC responds as follows.

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

Respondents: QCC Legal;

- COM _____
 - APA _____
 - ECR _____
 - GCI _____
 - RAD _____
 - SRC _____
 - ADM _____
 - OPC _____
 - CLK _____
- Patrick Welch, QCC Manager Facility Cost
1801 California Street, 6th Floor
Denver, CO 80202

REDACTED

03532 MAY 31 2009
FPSC-COMMISSION CLERK