

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expedited Consideration for Declaratory Rulings)	
On the transfer of traffic only under AT&T)	
Tariff Section 2.1.8., and Related Issues)	
)	
Primary Jurisdiction Referral)	
From the NJ District Court)	WC Docket No. 06-210
)	
One Stop Financial, Inc.)	
Group Discounts, Inc.)	
Winback & Conserve Program, Inc.)	
800 Discounts, Inc.)	
)	
)	Petitioners
and)	
)	
AT&T Corp.)	
)	
)	Respondent

**AT&T’S RESPONSE TO
PETITIONERS’ MOTION TO END CASE**

As the Commission is aware, AT&T stopped responding to petitioners’ submissions years ago due to their highly repetitive, vexatious and intemperate nature, and because every AT&T response spawned more filings by petitioners. AT&T departed from that practice earlier this month with respect to petitioners’ January 20, 2016 “motion” to temporarily suspend the proceeding. AT&T did so because, among other things, (1) petitioners made inaccurate assertions about proceedings before the District Court last year; (2) the relief they sought was inconsistent with the Court’s order denying their motion to lift the stay of the court action; and (3) AT&T had not made any prior submission to the Commission addressing the Court’s 2015 ruling or the proceedings leading to it.

After filing a 32-page response in support of their temporary suspension “motion” on Friday, February 5th, petitioners filed yet another “motion” the following Monday, asking the

Commission to “end [the] case” based primarily on arguments concerning what petitioners characterize as “the 15 days statute of limitations within section 2.1.8.” 2/08/16 Mot. Petitioners attached a 21-page letter, purportedly written by their counsel, that rehashes arguments about subsection C of section 2.1.8 that AT&T rebutted at the outset of this proceeding, *see, e.g.*, Comments of AT&T in Opposition to Request for Declaratory Rulings (Dec. 20, 2006) at 34-35, as well as in subsequent filings. AT&T’s Response to Petition to Expedite at 1-2 (May 14, 2008).

Petitioners’ attempt to force AT&T to brief these (and other previously-briefed) issues yet again (and to subject the Commission to yet further briefing on such issues) is improper. AT&T opposes petitioners’ “motion” to “end [the] case” for all of the relevant reasons set forth in its prior submissions. Unless the Commission requests that it do so, AT&T will not respond to any future “motions” or other submissions from petitioners that continue to rehash and repackaging previously briefed issues or that attempt to expand the scope of the proceeding.

Respectfully submitted,

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