

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

September 10, 1999

RECEIVED

SEP 13 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Joan Marsh
Director, Federal Government Affairs
AT&T Corp.
Suite 1000
1120 20th Street, NW
Washington, DC 20036

Re: Application for Consent to the Transfer of Control of Licenses
from MediaOne Group, Inc. to AT&T Corp. (CS 99-251)
Requests for Information and Documentary Materials

Dear Ms. Marsh:

This letter memorializes the telephone conferences which the Cable Services Bureau staff held with AT&T representatives including yourself, Mr. Steve Garavito, and Mr. Larry Lafaro, and Mr. David Lawson of Sidley and Austin on September 1-7 regarding AT&T's responses to our document and information requests, made at our July 28 and August 3, 1999 meetings and detailed in my letter of August 9, 1999. We had requested that AT&T respond to our document and information requests within three weeks of the meetings at which we made our original requests. During our telephone conferences, AT&T presented alternative proposals for responding to our requests as discussed below.

Regarding our requests stated at the July 28, 1999 meeting, AT&T proposed to produce responsive documents and information by September 10, 1999, accompanied by a cover letter detailing the gaps in AT&T's production and AT&T's proposed narrowing of our document and information requests. AT&T stated that it was having difficulty in gathering the materials requested, particularly with regard to documents and information in the possession of Liberty Media Corporation. We remind AT&T that it has the obligation to provide a complete and accurate production of information in the possession of AT&T, its affiliates and subsidiaries. We ask that AT&T submit a letter identifying (preferably by Bates-stamp number) the documents responsive to each document request.

Regarding our requests stated at the August 3, 1999 meeting, AT&T contended that the subject of these requests, advanced digital set top boxes, is irrelevant to the merger analysis and that production of the responsive confidential documents and information would be detrimental to AT&T's business interests. AT&T proposed to

No. of Copies rec'd 2
List ABCDE

produce AT&T Vice-President Laurie Priddy on September 16, 1999 to discuss its plans for advanced digital set top boxes, and we have agreed to conduct that meeting prior to deciding whether to restate or narrow our document and information requests on this subject.¹

The Commission's review of the proposed merger of AT&T and MediaOne depends on the parties' timely, expeditious, and complete production of information and documents to support their merger application. We request that AT&T supplement its production as any new documents and information responsive to our continuing requests are generated in the future. I would also appreciate receiving a copy of all AT&T responses to the Cable Services Bureau staff's document and information requests on a 3.5" diskette in an IBM compatible format using Word 97 software. If you have any questions regarding these requests, please do not hesitate to contact me.

Sincerely,



To-Quyen Truong
Associate Chief, Cable Services Bureau

cc: Deborah Lathen

¹ Ms. Priddy was unavailable in August and the first half of September, and we have agreed to accommodate her schedule. We consistently have extended the production and meeting schedule to accommodate AT&T based on its difficulty in gathering documents and making available the AT&T representatives with the requisite information to supplement the merger application.