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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 13, 2001

**Via Hand Delivery**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, DC 20554

RE: C.F. Communications Corp., *et al.* v. Century Tel. Of Wisconsin, Inc., *et al.*  
EB Docket No. 01-99; File No. E-93-49

Dear Ms. Salas:

Please find enclosed for immediate filing an original and four copies of "Defendant Southwestern Bell Telephone Company's First Set of Interrogatories to Complainant" and "Defendant Southwestern Bell Telephone Company's First Set of Requests for Production to Complainant." Please mark one of these copies "filed" and return it to the courier for my files.

By copy of this letter, service copies have been appropriately served on the administrative law judge, the Enforcement Bureau attorneys of record, and counsel for the parties. Feel free to contact me should there be any questions or concerns about this request or the enclosure.

Respectfully,

William A. Brown  
Attorney for Southwestern Bell Telephone Company

SBC Telecommunications, Inc.  
1401 I Street, N.W., Suite 1100  
Washington, DC 20005  
202/326-8904 – Voice  
202/408-8745 – Fax

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List A B C D E

Magalie Roman Salas, Secretary  
June 13, 2001  
Page 2

Enclosures

CC: Counsel of Record



1. “Person” or “persons” means an individual or natural person, corporation, proprietorship, partnership, firm, association, joint venture or other entity or organization.
2. “Identify” or “identity” when used in reference to a business firm or business organization or non-profit organization or entity, whether incorporated or not, means to give sufficient information to facilitate and effectuate the identification and location of that entity. At a minimum, this information should be sufficient to satisfy an information designation for persons with firsthand knowledge set out in Commission Rule 1.721(a)(10)(i).
3. “Identify” or “identity” when used in reference to a document, data compilation, or other tangible thing means to give a sufficient description to satisfy an information designation for documents, data compilation, and tangible things set out in Commission Rule 1.721(a)(10)(ii). If such information is not available, you should give some other means of identifying it and its present location, and the identity of each person presently having possession, custody or control of the document, data compilation, or other tangible thing or any copies thereof.
4. “Identify” or “identity” when used in reference to a natural person means providing sufficient information to facilitate and effectuate the identification and location of that person. At a minimum, this information should be sufficient to satisfy an information designation for persons with firsthand knowledge set out in Commission Rule 1.721(a)(10)(i).
5. “You” or “your” or “Complainant” and any synonyms thereof refer to the Complainant named in this matter, to any other persons or entities whatsoever who claim a right to damages from the defendant in the above-referenced formal complaint case in the place of the Complainant named in this matter, and their agents, employees, servants, and legal representatives, as well as any affiliated or subsidiary companies and successors and assigns.
6. In supplying copies of documents, data compilations, or other tangible things, the copies must be complete, with no portions deleted during copying or otherwise, fully legible, and must be specifically identified with the request number for which the copies are being supplied.

7. The terms “information,” “facts,” and “circumstances” are not limited to information that is or may be admissible in evidence or that is based on personal knowledge.
8. When used in these requests, the terms “documents,” “data compilations,” and/or “tangible things” are intended to and shall embrace and include everything that is included in the meaning of those terms as those terms are used in the Commission's Rules. Reference to one such term includes the other two, as well. In any case, such terms do not mean any less than the terms “documents” and “tangible things” as used in Fed. R. Civ. P. 34.
9. The terms “Defendant” or “Southwestern Bell” or “SWBT” and any synonyms thereof refer to Southwestern Bell Telephone Company, to SBC Communications Inc., to any of its subsidiary corporations, and to their directors, officers, agents, attorneys, employees, servants and legal representatives.
10. As used in these interrogatories, the term “EUCL charge” shall mean “End User Common Line charge” that you claim was wrongfully assessed and/or for which you seek damages in this formal complaint case.
11. As used in these interrogatories, the term “public payphone” means “[a] pay telephone . . . used to provide public telephone service when a public need exists, such as at ‘an airport lobby, at the option of the telephone company and with the agreement of the owner of the property on which the phone is placed.’” See, *Hearing Designation Order*, DA 01-1044, ¶ 4 (rel. April 24, 2001) (*HDOrder*), citing *MTS and WATS Market Structure*, Order on Reconsideration, 97 FCC 2d 682, 704, n.41 (1983) (“*First Reconsideration Order*”).
12. As used in these interrogatories, the term “semi-public payphone” means “[a] pay telephone . . . used to provide semi-public telephone service when there is a combination of general public and specific customer need for the service, such as at a gasoline station or pizza parlor.” See, *HDOrder*, ¶ 4.
13. The term “LEC” means local exchange carrier.
14. The terms “Commission” and “FCC” mean the Federal Communications Commission.

15. Unless otherwise expressly stated in the request, the relevant time period for these requests is from and including the earliest date on which you seek to recover damages in this formal complaint case through and including the present.

## **II. Instructions**

1. Where answers to the requests are supplied upon information and belief, please so state and specifically identify and describe all sources of such information and belief. If you are unable to answer any request or any portion thereof either by actual knowledge or upon information and belief, please state so and describe in detail your efforts to obtain such knowledge or information.
2. If you object to any request on any ground, please set forth all reasons therefor, including a detailed statement of the factual basis for any claim of privilege.
3. Each requested document, data compilation, and other tangible thing is to be produced in its original form (along with all drafts thereof) in its entirety, without abbreviation or expurgation. Documents, data compilations, and tangible things shall be produced as they are kept in the usual course of business, or organized and labeled to correspond with the individual request by which identification or production is sought.
4. These requests shall be deemed continuing, so as to require you to supplement answers with additional information that you acquire after the date of your original responses.
5. Every answer, objection, or other response to any request must be preceded by the request to which the response pertains.

**PLEASE PRODUCE AND PERMIT INSPECTION AND COPYING OF THE FOLLOWING DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS:**

## **III. Requests for Production**

1. All bills, invoices, or other records of charges that reflect any EUCL charges assessed against you by Southwestern Bell.

**RESPONSE:**

2. All correspondence between you and Southwestern Bell concerning the payment of any bills, invoices, or other record of charges that involve the assessment of EUCL charges against you by Southwestern Bell.

**RESPONSE:**

3. All dunning notices or notices concerning discontinuing service sent to you by Southwestern Bell for the non-payment of any bills, invoices, or other record of charges that involve the assessment of EUCL charges against you by Southwestern Bell.

**RESPONSE:**

4. All records that support or tend to support any contention by you that you actually paid Southwestern Bell for the EUCL charges assessed against you by it, including, but not limited to, canceled checks, accounting records, and receipts.

**RESPONSE:**

5. If you are a corporation, a copy of your articles of incorporation and by-laws.

**RESPONSE:**

6. If you are a partnership, a copy of all documents that govern your partnership, including, but not limited to, your partnership agreement.

**RESPONSE:**

7. If you are not "Millicom Services Company," all documents by which you claim the authority to seek damages in this formal complaint case for or in the place of Millicom Services Company, including, but not limited to, assignments, agreements, articles of incorporation, partnership agreements, and minutes of company boards of directors.

**RESPONSE:**

8. All documents by which Millicom Services Company became a “successor in interest to Millicom Telecommunications Services, Inc.” *See, Complaint, ¶ 1, p. 1, n.1.*

**RESPONSE:**

9. With respect to each and every person who may be used at the hearing or otherwise in this formal complaint case to present evidence in any format under Fed.R.Evid. 702, 703, or 705 (e.g., any and all expert witnesses) and, with respect to each one individually,
- (a) all correspondence between complainant and such witnesses concerning their participation as witnesses in this case;
  - (b) all reports or other statements made to Complainant by them concerning any opinions held; all reports provided by the witnesses concerning this formal complaint case;
  - (c) all exhibits — whether or not they may actually be admitted into evidence — that may be used at any hearing or otherwise in connection with the prosecution of this formal complaint case, including demonstrative exhibits or exhibits to be used as a summary of or support for the opinions of the witness;
  - (d) any and all documents that form the basis of the witness’s agreement to appear and to testify on your behalf, including but not limited to, contracts, letter agreements, and memorandums of understanding; and
  - (e) any promotional documents and advertising used by the witness in an effort to market any services that are being provided to you in connection with the prosecution of this formal complaint case.

**RESPONSE:**

10. Any and all business licenses under which or pursuant to which you ran your pay telephone business in the State of Texas or anywhere else within Southwestern Bell’s five-state service

area (Arkansas, Kansas, Missouri, Oklahoma, and Texas) from and including November 1, 1990 through and including April 16, 1997.

**RESPONSE:**

11. Any and all documents under which or pursuant to which you registered to company name or registered to run your pay telephone business in the State of Texas or anywhere else within Southwestern Bell's five-state service area (Arkansas, Kansas, Missouri, Oklahoma, and Texas) from and including November 1, 1990 through and including April 16, 1997.

**RESPONSE:**

12. All documents, data compilations, and tangible things in the your possession, custody, or control that are relevant to your claim for damages in this formal complaint case.

**RESPONSE:**

13. All documents surrounding the sale of and/or transfer of your business in Texas or the sale of and/or transfer of your assets to Peoples Telephone Company in or around 1992 or 1993.

**RESPONSE:**

14. By letter addressed to Mr. Charles Scharnberg, dated September 20, 2000, your attorney, Charles V. Mehler, III, advised defendant that your "revised estimate of EUCL charges imposed by SBC [presumably Southwestern Bell] on New York Telecommunications (Millicom)" was \$120,708.13. With respect to this assertion, all documents and other tangible things that support or tend to support this estimate of EUCL charges imposed by Southwestern Bell.

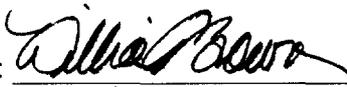
**RESPONSE:**

15. All documents, data compilations, and other tangible things identified by you in response to any of the interrogatories propounded to you by Southwestern Bell in "Defendant Southwestern Bell Telephone Company's First Set of Interrogatories to Complainant."

**RESPONSE:**

SOUTHWESTERN BELL  
TELEPHONE COMPANY

Dated: June 13, 2001

By:   
William A. Brown

William A. Brown  
Davida M. Grant  
Roger K. Toppins  
Paul Mancini

SBC Telecommunications, Inc.  
1401 I Street, N.W., Suite 1100  
Washington, DC 20005  
(202) 326-8904 — Voice  
(202) 408-8745 — Facsimile

Its Attorneys

**CERTIFICATE OF SERVICE**

I, William A. Brown, the undersigned attorney of record, do hereby certify that I have caused copies of the foregoing “**DEFENDANT SOUTHWESTERN BELL TELEPHONE COMPANY’S FIRST SET OF INTERROGATORIES TO COMPLAINANT**” to be served in accordance with 47 C.F.R. § 1.735(f) via hand delivery or via facsimile transmission, followed by regular U.S. mail delivery, postage prepaid, this 13 day of June, 2001, to each of the following persons:

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, DC 20554  
*Via Hand Delivery*

Arthur I. Steinberg, Administrative Law Judge  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W., Room 1-C861  
Washington, DC 20054  
*Courtesy Copy, Via Regular Mail*

Tejal Mehta  
Federal Communications Commission  
Enforcement Bureau  
Market Disputes Resolution Division  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554  
*Via Hand Delivery*

David Solomon, Chief  
Federal Communications Commission  
Enforcement Bureau  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554  
*Via Hand Delivery*

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Michael J. Thompson  
Wright & Talisman, PC  
1200 G Street, NW, Suite 600  
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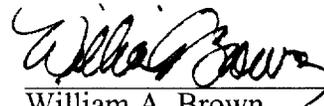
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Sherry A. Ingram  
Verizon  
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Arlington, VA  
*Via Regular Mail*

Angela N. Brown  
Theodore Kingsley  
Regulatory Counsel, BellSouth  
675 West Peachtree Street, Suite 4300  
Atlanta, GA 30375  
*Via Fax: 404-614-4054*

  
\_\_\_\_\_  
William A. Brown



3. "Identify" or "identity" when used in reference to a document, data compilation, or other tangible thing means to give a sufficient description to satisfy an information designation for documents, data compilation, and tangible things set out in Commission Rule 1.721(a)(10)(ii). If such information is not available, you should give some other means of identifying it and its present location, and the identity of each person presently having possession, custody or control of the document, data compilation, or other tangible thing or any copies thereof.
4. "Identify" or "identity" when used in reference to a natural person means providing sufficient information to facilitate and effectuate the identification and location of that person. At a minimum, this information should be sufficient to satisfy an information designation for persons with firsthand knowledge set out in Commission Rule 1.721(a)(10)(i).
5. "You" or "your" or "Complainant" and any synonyms thereof refer to the Complainant named in this matter, to any other persons or entities whatsoever who claim a right to damages from the defendant in the above-referenced formal complaint case in the place of the Complainant named in this matter, and their agents, employees, servants, and legal representatives, as well as any affiliated or subsidiary companies and successors and assigns.
6. If copies of documents, data compilations, or other tangible things are supplied in lieu of any answers, the copies must be complete, with no portions deleted during copying or otherwise, fully legible, and must be specifically identified with the interrogatory number for which the copies are being supplied.
7. The terms "information," "facts," and "circumstances" are not limited to information that is or may be admissible in evidence or that is based on personal knowledge.
8. When used in these interrogatories, the terms "documents," "data compilations," and "tangible things" are intended to and shall embrace and include everything that is included in the meaning of those terms as those terms are used in the Commission's Rules. In any case, such terms do not mean any less than the terms "documents" and "tangible things" as used in Fed. R. Civ. P. 34.

9. The terms “Defendant” or “Southwestern Bell” or “SWBT” and any synonyms thereof refer to Southwestern Bell Telephone Company, to SBC Communications Inc., to any of its subsidiary corporations, and to their directors, officers, agents, attorneys, employees, servants and legal representatives.
10. As used in these interrogatories, the term “EUCL” shall mean “End User Common Line charge” that you claim was wrongfully assessed and/or for which you seek damages in this formal complaint case.
11. As used in these interrogatories, the term “public payphone” means “[a] pay telephone . . . used to provide public telephone service when a public need exists, such as at ‘an airport lobby, at the option of the telephone company and with the agreement of the owner of the property on which the phone is placed.’” *See, Hearing Designation Order*, DA 01-1044, ¶ 4 (rel. April 24, 2001) (*HDOrder*), citing *MTS and WATS Market Structure*, Order on Reconsideration, 97 FCC 2d 682, 704, n.41 (1983) (“*First Reconsideration Order*”).
12. As used in these interrogatories, the term “semi-public payphone” means “[a] pay telephone . . . used to provide semi-public telephone service when there is a combination of general public and specific customer need for the service, such as at a gasoline station or pizza parlor.” *See, HDOrder*, ¶ 4.
13. The term “LEC” means local exchange carrier.
14. The terms “Commission” and “FCC” mean the Federal Communications Commission.
15. Unless otherwise expressly stated in the interrogatory, the relevant time period for these interrogatories is from and including the earliest date on which you seek to recover damages in this formal complaint case through and including the present.

## **II. Instructions**

1. Where answers to the interrogatories are supplied upon information and belief, please so state and specifically identify and describe all sources of such information and belief. If you are unable to answer any interrogatory or any portion thereof either by actual knowledge or upon

information and belief, please state so and describe in detail your efforts to obtain such knowledge or information.

2. If you object to any interrogatory on any ground, please set forth all reasons therefor, including a detailed statement of the factual basis for any claim of privilege.
3. Each requested document, data compilation, and other tangible thing is to be produced in its original form (along with all drafts thereof) in its entirety, without abbreviation or expurgation. Documents, data compilations, and tangible things shall be produced as they are kept in the usual course of business, or organized and labeled to correspond with the individual interrogatory by which identification or production is sought.
4. These interrogatories shall be deemed continuing, so as to require you to supplement answers with additional information that you acquire after the date of your original responses.
5. Every answer, objection, or other response to any interrogatory must be preceded by the question or request to which the response pertains.

### **III. Interrogatories**

1. Please give the following:

(a) the identity of the person or persons answering these interrogatories;

(b) the identify of all persons consulted in answering these interrogatories, including the individual number or numbers of interrogatories as designated herein with regard to which each such person was consulted.

**ANSWER:**

2. (a) Please state your full legal name or names, as well as any aliases, trade names, or other DBAs (names under which you do business); and,
- (b) if a natural person or persons, please state your complete street address, telephone number, and Social Security Number; or
- (c) if a business entity or entities, please state the complete business street address and main telephone number for your principal place of business.

**ANSWER:**

3. In its Complaint filed with the FCC in this formal complaint case, Millicom Services Company asserted that it was “a New York partnership with its principal place of business at 555 63<sup>rd</sup> Street, Brooklyn, New York 11220 . . . .” With respect to that allegation, please identify all of the partners of Millicom Services Company and, with each individual partner, please provide the following:

(a) If a natural person, the identity of that person;

(b) If a legal entity, the identity of that entity and

(1) If all or some of the partners are corporations, then for each such partner the state of incorporation, its principal place of business, and the identity of its principal officers (president, secretary, and treasurer);

(2) If all or some of the partners are other partnerships, then the identity of each partner in each such partnership.

**ANSWER:**

4. In its Complaint filed with the FCC in this formal complaint case, Millicom Services Company asserted that it was “the successor in interest to Millicom Telecommunications Services, Inc., who provided independent public payphones in defendant’s territory, . . . .” With respect to this allegation, please state all facts, information, and circumstances by which Millicom Services Company became the “successor in interest to Millicom Telecommunications Services, Inc.”

**ANSWER:**

5. If you are a corporation or corporations, please state:

(a) State of incorporation;

(b) Date of incorporation;

(c) The identity of the president, secretary, treasurer, and agent for service of process.

**ANSWER:**

6. If you are a partnership, please:

(a) Identify all the partners;

(b) State the name of the state whose laws govern the partnership; and

(c) State whether there is a written partnership agreement governing the partnership.

**ANSWER:**

7. If you contend that the present Complainant is “New York City Telecommunications Company, Inc.” (NYCTC) then please state the following:

(a) All facts, information, and circumstances that you believe support or tend to support your contention that NYCTC is entitled to assert claims for damages in this formal complaint case for or in the place of Millicom Services Company;

(b) The identity of all persons with knowledge of any such facts, information, and circumstances;

(c) The identity of all documents and/or tangible things that support or tend to support your contention that NYCTC is entitled to assert claims for damages in this formal complaint case in the place of Millicom Services Company.

**ANSWER:**

8. If you contend that the present Complainant is “New York Telecommunications” (NYT) then please state the following:

(a) All facts, information, and circumstances that you believe support or tend to support your contention that NYT is entitled to assert claims for damages in this formal complaint case for or in the place of Millicom Services Company;

(b) The identity of all persons with knowledge of any such facts, information, and circumstances;

(c) The identity of all documents and/or tangible things that support or tend to support your contention that NYT is entitled to assert claims for damages in this formal complaint case in the place of Millicom Services Company.

**ANSWER:**

9. With respect to your claim for damages in this formal complaint case, please identify each individual believed to have firsthand knowledge of the facts alleged with particularity in the complaint, along with a description of the facts within any such individual's knowledge, providing, among other things, the name, address, and position of each such individual. *See, Commission Rule 1.721(a)(10)(i).*

**ANSWER:**

10. With respect to your claim for damages in this formal complaint case, please provide a description of all documents, data compilations, and tangible things in your possession, custody, or control, that are relevant to that claim. Such description shall include for each document:

- (a) The date it was prepared, mailed, transmitted, or otherwise disseminated;
- (b) The author, preparer, or other source;
- (c) The recipient(s) or intended recipient(s);
- (d) Its physical location; and
- (e) A description of its relevance to the matters contained in the complaint. *See,*

*Commission Rule 1.721(a)(10)(ii).*

**ANSWER:**

11. (a) Please provide either a computation of each and every category of damages for which recovery is sought, along with an identification of all relevant documents and materials or such other evidence to be used by the complainant to determine the amount of such damages; (b) or an explanation of the information not in your possession that is necessary to develop a detailed computation of damages; why such information is unavailable to the complaining party; the factual basis the complainant has for believing that such evidence of damages exists; and a detailed outline of the methodology that would be used to create a computation of damages with such evidence. *See, Commission Rule 1.722(c).*

**ANSWER:**

12. Please disclose the identity of each and every person who may be used at the hearing or otherwise in this formal complaint case to present evidence in any format under Fed.R.Evid. 702, 703, or 705 (e.g., any and all expert witnesses) and, with respect to each one individually, please provide the following:

- (a) a complete statement of all opinions to be expressed and the basis and reasons therefor;
- (b) the data or other information considered by the witness in forming those opinions;
- (c) any exhibits to be used as a summary of or support for those opinions;
- (d) the qualifications of the witness, including a list of all publications authored by the witness within the preceding ten years;
- (e) the compensation to be paid for any study and for the testimony of the witness; and
- (f) a listing of any other cases in which the witness has testified at trial or by deposition within the preceding four years. *See, Fed.R.Civ. P. 26(a)(2).*

N.B.: In addition to any witness who has been retained or specially employed to provide expert testimony in this matter, such persons shall include any present or former employees of the Complainant whose duties as an employee of the Complainant either regularly involved or do regularly involve giving expert testimony.

**ANSWER:**

13. Please identify each and every payphone for which you contend that an EUCL charge was unlawfully assessed by Southwestern Bell and, with respect to each such payphone individually, please provide the following information:

- (a) The telephone number assigned to that phone;
- (b) The location of that phone;
- (c) The identity of the premises owner where the phone was located;
- (d) Whether you contend the phone was a “public payphone” or a “semi-public payphone,” stating the facts, information and circumstances that you contend support or tend to support your assertion;
- (e) The date of installation and, if applicable, discontinuance of service to that payphone by Southwestern Bell.

**ANSWER:**

14. Please describe your relationship to and/or business dealings with the following entities, including, but not limited to, any dealings with them at any time from and including November 1990 through the present:
- (a) Millicom, Inc.;
  - (b) Cointel Communications, Inc.
  - (c) Peoples Telephone Company, Inc.
  - (d) Millicom Telecommunications Service
  - (e) ETS Payphones, Inc.
  - (f) New York City Telecommunications Company, Inc.
  - (g) New York Telecommunications.

**ANSWER:**

15. For the period from and including November 1, 1990 through and including April 30, 1997, please identify each and every person or entity that owned pay telephone equipment in Texas and/or purchased telephone service from Southwestern Bell for the provisioning of pay telephone service for whom or on whose behalf you seek to recover damages against Southwestern Bell in this formal complaint case, giving the applicable periods of ownership and/or purchase for each such person or entity.

**ANSWER:**

16. With respect to your allegation that Millicom Services Company had “approximately 200 IPP stations in the State of Texas” (*see, Complaint, p. 3*), please state whether the same IPP stations were sold to Peoples Telephone Company, Inc. and, if so, the date of that sale.

**ANSWER:**

17. By letter addressed to Mr. Charles Scharnberg, dated September 20, 2000, your attorney, Charles V. Mehler, III, advised defendant that your “revised estimate of EUCL charges imposed by SBC [presumably Southwestern Bell] on New York Telecommunications (Millicom)” was \$120,708.13. With respect to this assertion, please:

(a) state whether this figure is still your current, best estimate of the EUCL charges assessed by SWBT and, if not, what the new figure is; and

(b) give all facts, circumstances, and information supporting your claim of the total amount of EUCLs assessed by SWBT, explaining how this figure was arrived at.

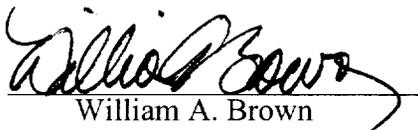
**ANSWER:**

18. In your attorney's letter of September 20, 2000, addressed to Mr. Charles Scharnberg, attorney for Southwestern Bell, you were identified as "New York Telecommunications" and in your attorney's letter to Judge Arthur I. Steinberg, dated June 1, 2001, you were identified as "New York City Telecommunications Company, Inc." With respect to these two letters, please whether you are "New York Telecommunications" or "New York City Telecommunications Company, Inc." or whether you have any other legal or trade names or names under which you do or have done business (DBAs).

**ANSWER:**

SOUTHWESTERN BELL  
TELEPHONE COMPANY

Dated: June 13, 2001

By:   
William A. Brown

William A. Brown  
Davida M. Grant

SBC Telecommunications, Inc.  
1401 I Street, N.W., Suite 1100  
Washington, DC 20005  
(202) 326-8904 — Voice  
(202) 408-8745 — Facsimile

Its Attorneys

**CERTIFICATE OF SERVICE**

I, William A. Brown, the undersigned attorney of record, do hereby certify that I have caused copies of the foregoing “**DEFENDANT SOUTHWESTERN BELL TELEPHONE COMPANY’S FIRST SET OF INTERROGATORIES TO COMPLAINANT**” to be served in accordance with 47 C.F.R. § 1.735(f) via hand delivery or via facsimile transmission, followed by regular U.S. mail delivery, postage prepaid, this 3 day of June, 2001, to each of the following persons:

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, DC 20554  
*Via Hand Delivery*

Arthur I. Steinberg, Administrative Law Judge  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W., Room 1-C861  
Washington, DC 20054  
*Courtesy Copy, Via Regular Mail*

Tejal Mehta  
Federal Communications Commission  
Enforcement Bureau  
Market Disputes Resolution Division  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554  
*Via Hand Delivery*

David Solomon, Chief  
Federal Communications Commission  
Enforcement Bureau  
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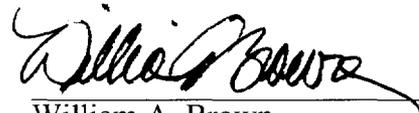
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