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JUN 14 2001

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June 11, 2001

01-99

Sherry A. Ingram
Regulatory Counsel
Verizon
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Re: *C.F. Communications Corp., et. al. v. Century Telephone of Wisconsin, Inc., et. al.*

Dear Sherry:

Enclosed please find Complainant's Responses and Objections to Defendant's First Requests for Production of Documents in the following cases: E-93-35, E-93-36, E-93-37, E-93-38, E-93-40, E-93-41, E-93-42, E-93-56, E-93-59, E-93-60, E-93-61, E-93-62, E-93-74, and E-93-81.

As with the interrogatory responses, we have been unable to complete responses to the requests for production for B.D.A. Sales, Inc. (E-93-50) or New York City Telecommunications Company (E-93-46, E-93-47, E-93-48) because our contacts at each of these companies are out of town dealing with family illnesses, or for ETS/NYPAY (E-93-34) because we have just recently undertaken representation in this formal complaint case and are in the process of determining what documents the client possesses. I will call you by Wednesday to let you know when we expect to be able to serve the responses in these remaining cases.

Thank you for your assistance. If you have any questions, do not hesitate to call.

Sincerely,



Charles V. Mehler III

Att.

cc: Service List Attached to Responses

No. of Copies rec'd 075
List A B C D E

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

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In the Matter of)

C.F. Communications Corp., et. al.,)

Complainants,)

v.)

Century Telephone of Wisconsin, Inc.,)
et. al.,)

Defendants.)

EB Docket No. 01-99

File No. E-93-56

**COMPLAINANTS' RESPONSES AND OBJECTIONS TO DEFENDANT'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Section 1.325(a) of the Commission's rules, 47 C.F.R. § 1.325(a),
Complainant herein responds to Defendant's First Request for Production of Documents
to Complainant.

GENERAL RESPONSES AND OBJECTIONS

1. Complainant's responses to the Requests for Productions are based on the
best information presently known to Complainant and the documents presently known and
available to Complainant, and Complainant reserves the right to amend, supplement,
correct, or clarify its responses when other or additional information or documents become

available, and to interpose objections or to move for an appropriate order when and if such becomes necessary.

2. The fact that Complainant produces documents to Defendant, or makes documents available for inspection and review by Defendant, however, does not mean that such documents provide evidence of all ANIs for the telephone lines that Complainant had in service during the period through April 16, 1997, or provide evidence of all damages incurred by Complainant during the period through April 16, 1997. Rather, additional information or documents from Defendant may be needed to ascertain all the ANIs for the telephone lines that Complainant had in service or all the damages that Complainant incurred as a result of the EUCL charges billed by Defendant.

3. Complainant will produce documents to Defendant and/or make documents available for inspection and review by Defendant, as set forth in the responses below, provided that Defendant signs an appropriate confidentiality agreement.

4. Complainant objects to these Requests for Production of Documents to the extent that they seek production of documents that are subject to the attorney-client privilege or the common interest privilege, documents that were prepared in anticipation of litigation or that otherwise constitutes protectable work product, or documents that contain or reflect confidential and proprietary business information.

5. Complainant objects to these Requests for the Production of Documents as unduly burdensome to the extent that they seek documents that are already in the possession of Defendant.

6. The term “Verizon” or “Defendant” as used in these Responses, Objections, and General Objections shall be defined to include the Defendant, Verizon New York, Inc., and any and all of its predecessor or successors, including, but not limited to, New York

Telephone Company, NYNEX, and Bell Atlantic, as well as any agents, attorneys, employees, or other persons or entities acting on behalf of these entities.

RESPONSES AND OBJECTIONS

1. All documents, including, but not limited to, service orders, invoices, bills, or receipts, that identify or reflect the dates of installation, suspension and disconnection during the relevant time period of each telephone line you used to provide public payphone service as to which you claim Defendant wrongfully assessed EUCL charges.

Objection:

Complainant objects to this Request for Production of Documents because Defendant, as the provider of the telephone lines to which Complainant's phones were connected, already has in its possession the documents requested in this Request for Production and the information contained within such documents.

Response:

Subject to this specific objection and the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

2. All documents, including, but not limited to, service orders, invoices, bills, or receipts, that identify or reflect the location of each public payphone for which you claim you were wrongfully assessed EUCL charges during the relevant time period.

Objection:

Complainant objects to this Request for Production of Documents because Defendant, as the provider of the telephone lines to which Complainant's phones were connected, already has in its possession the documents requested in this Request for Production and the information contained within such documents.

Response:

Subject to this specific objection and the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

3. All documents, including, but not limited to, service orders, invoices, bills, or receipts, that identify or reflect whether the payphone was used to provide public telephone service where a public need existed.

Objection:

Complainant objects to this Request for Production of Documents because Defendant, as the provider of the telephone lines to which Complainant's phones were connected, already has in its possession the documents requested in this Request for Production and the information contained within such documents.

Response:

Subject to this specific objection and the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

4. All documents, including, but not limited to, bills, invoices, cancelled checks, pay stubs or receipts, that evidence your payment of EUCL charges you claim were wrongfully assessed for each month during the relevant time period.

Objection:

Complainant objects to this Request for Production of Documents because Defendant, as the provider of the telephone lines to which Complainant's phones were connected, already has in its possession the documents requested in this Request for Production and the information contained within such documents.

Response:

Subject to this specific objection and the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

5. All documents, including any communications, relating to your payment or non-payment of any EUCL charges you claim were wrongfully assessed during the relevant time period.

Objection:

Complainant objects to this Request for Production of Documents because Defendant, as the provider of the telephone lines to which Complainant's phones were connected, already has in its possession the documents requested in this Request for Production and the information contained within such documents.

Response:

Subject to this specific objection and the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC

20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

6. All documents you rely upon to support your claim for damages in this proceeding.

Response:

Subject to the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

7. All documents or other evidentiary material relating to your computation of damages for the relevant time period.

Response:

Subject to the foregoing General Objections, Complainants will make available for Defendant's inspection, copying, and review at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, NW, Washington, DC 20037-1526, (202) 785-9700, the non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request.

8. All documents provided to any expert you plan to call as a witness at the hearing on this matter.

Response:

Subject to the foregoing General Objections, Complainant states that it has not yet determined whether it will call any expert witness at the hearing in this matter or the documents that will be provided to any such expert. When these determinations are made, Complainant will provide and/or make available for Defendant's inspection, copying, and review the responsive, non-privileged documents in Complainant's possession, custody, or control that are fairly called for by this Request in accordance with any expert disclosure schedule that the parties or the Administrative Law Judge may establish.

9. All documents prepared by, or under the direction or supervision of any expert you expect to call as a witness at the hearing in this matter, including reports that contain preliminary conclusions.

Response:

Subject to the foregoing General Objections, Complainant states that it has not yet determined whether it will call any expert witness at the hearing in this matter, and thus does not currently possess any documents responsive to this Request.

Dated: June 11, 2001

DICKSTEIN SHAPIRO MORIN
& OSHINSKY LLP
2101 L Street, N.W.
Washington, D.C. 20037-1526
(202)785-9700
Attorneys for Complainants

By: Albert H. Kramer^{an}
Albert H. Kramer

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2001, a copy of the foregoing Complainant's Responses and Objections to Defendant's First Request for Production of Documents was served by first-class mail, postage prepaid, on Sherry A. Ingram, Verizon, 1320 North Court House Road, Arlington, VA 22201, and John M. Goodman, Verizon, 1300 I Street, NW 400W, Washington, DC 20005, and served by first-class mail, postage prepaid, on the following parties:

The Honorable Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
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Washington, DC 20554

Magalie Roman Salas, Secretary
Office of the Commission Secretary
Federal Communications Commission
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Tejal Mehta, Esquire
Federal Communications Commission
Market Disputes Resolution Division
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445 12th Street, S.W.
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David H. Solomon, Chief
Enforcement Bureau
Federal Communications Commission
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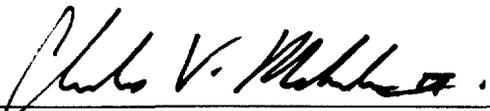
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Charles V. Mehler III