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June 18, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: C.F. Communications Co. v. Century Tel. of Wisconsin, Inc.,
EB Docket No. 01-99

Dear Judge Steinberg:

This is to advise you and the parties of a correction to my letter to you of June 1, 2001, regarding the names of the complainants that I am representing.

The formal name of Kayson Communications Inc., the complainant in File No. E-93-58, is Kayson Communications Ltd. Kayson's customers and vendors frequently use the name Kayson Communications Inc., so Kayson also often calls itself that in its business. The same was true when Kayson filed its formal complaint (File No. E-93-58) in 1993.

Please accept my apology for any inconvenience that this error may have caused to you or to the parties.

Should you have any questions or require any additional information, please let me know.

Very truly yours,

Michael J. Thompson
Attorney for
Kayson Communications, Ltd.

cc: Service List

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Before the
Federal Communications Commission
WASHINGTON, D.C. 20554

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JUN 18 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
C.F. Communications Corp., et al.	)	EB Docket No. 01-90
Complainants,	)	
v.	)	File No. E-93-58
Century Telephone of Wisconsin, Inc., et al.	)	
Defendants.	)	

To: Arthur I. Steinberg
Administrative Law Judge

ANSWERS AND OBJECTIONS OF KAYSON COMMUNICATIONS LTD. TO DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO COMPLAINANT

Kayson Communications Ltd. ("Kayson"), complainant in File No. E-93-58 hereby responds to Defendant's First Request for Production of Documents to Complainant.

GENERAL RESPONSES/OBJECTIONS

For the purposes of these responses and objections, the term "defendant" is used to refer to Verizon-New York, Inc., and all of its corporate predecessors and successors, including, but not limited to, New York Telephone Company.

Kayson objects to defendant's document requests to the extent that they may encompass documents that are subject to the attorney-client privilege and/or the attorney work product or other immunities from discovery. Kayson states, however, that it

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presently knows of no responsive documents in its possession, custody or control that are within the scope of this objection.

Kayson's responses state that it will make certain types of documents available for inspection and copying by defendant. The availability of such documents is subject to defendant's agreement to a reasonable confidentiality agreement.

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.

Response: See attached document bearing Bates stamp numbers 200016-200019. Copies of defendant's bills to Kayson in Kayson's files may also be responsive to this request. Kayson will make those documents available to defendant for inspection and copying at a mutually agreeable time at Kayson's place of business. Kayson continues to search its records for other materials containing information responsive to 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.

Response: The locations of some or all of Kayson's payphones that were in service during the relevant time period as defined by defendant can be derived from Kayson's records of commission payments to phone location owners/occupants. Defendant can determine whether the records contain such information as readily as Kayson and reproduction of all of the records would be unduly burdensome. Kayson will make those documents available to defendant for inspection and copying at a mutually agreeable time

at Kayson's place of business. Kayson continues to search its records for other materials containing information responsive to 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.

Response: Kayson believes that at least some of its contracts with location owners for the placement of Kayson's payphones may be responsive to this request. Defendant can determine whether the contracts contain such information as readily as Kayson and reproduction of all of the contracts would be unduly burdensome. Kayson will make these documents available to defendant for inspection and copying at a mutually agreeable time at Kayson's place of business.

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.

Response: Copies of defendant's bills to Kayson in Kayson's files and certain of Kayson's check stubs may be responsive to this request. Defendant can determine whether these documents are responsive as readily as Kayson and reproduction of all of the documents would be unduly burdensome. Kayson will make these documents available to defendant for inspection and copying at a mutually agreeable time at Kayson's place of business.

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.

Response: Certain of Kayson's check stubs reflecting payments to defendant may be responsive to this request. Review and/or reproduction of all such documents would be unduly burdensome. Kayson will make these documents available to defendant for inspection and copying at a mutually agreeable time at Kayson's place of business.

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

Response: In a general sense, Kayson relies upon the records identified in response to Request Nos. 1 through 5, as well as on records in defendant's possession, custody and control. All such documents either already are, or will be, available to defendant. Kayson has not yet determined what particular documents it will rely on to support its position on damages at the hearing in this matter.

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

Response: Kayson has not yet computed its damages for the relevant time period as defendant defines it.

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

Response: Kayson has not yet determined whether it will call an expert witness at the hearing in this matter.

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: Kayson has no such documents. See Response to Request No. 8.

WRIGHT & TALISMAN, P.C.

By _____
Michael J. Thompson

1200 G Street, N.W., Suite 600
Washington, D.C. 20005
202-393-1200

June 18, 2001

k:\eucl\verizon document request-Kayson

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2001, copies of the foregoing "Answers and Objections of Kayson Communications Ltd. to Defendant's First Request for Production of Documents to Complainant" was served by hand-delivery on the following parties:

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Fax: 202-336-7921

Sherry A. Ingram
Verizon
1320 North Courthouse Rd.
Arlington, VA 22201

Honorable Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Magalie Roman Salas, Secretary
Office of the Commission Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

And by U.S. Mail on the following parties:

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