

KNOWLEDGEABLE AT&T EMPLOYEES

Carole Breckinridge	District Manager, CMD-Domestic Card/ ER800 Product Management	295 N. Maple Avenue Basking Ridge, NJ 07920	AT&T's revenue from its calling card service; AT&T's minutes of use; AT&T's profits from its calling card; AT&T's share of the consumer calling card market
Lou Delery	Director – Card Product Management	295 N. Maple Avenue Basking Ridge, NJ 07920	AT&T's revenue from its calling card service; AT&T's minutes of use; AT&T's profits from its calling card service; AT&T's share of the consumer calling card market
Arlene S. Fedak	Finance Manager, AT&T Consumer Services	295 N. Maple Avenue Basking Ridge, NJ 07920	The methodology utilized in preparing AT&T's income statement
Peter Jacoby	General Attorney/LGA	295 N. Maple Avenue Room 1134L2 Basking Ridge, NJ 07920	Dealings and communications between Qwest and AT&T
Mark Rosenblum	Vice-President/Law	295 N. Maple Avenue Basking Ridge, NJ 07920	Dealings and communications between Qwest and AT&T

DOCUMENT	DATE	AUTHOR	RECIPIENT(S)	LOCATION	RELEVANCE
Responses of US WEST Communications, Inc. to AT&T's First Set of Interrogatories served in <u>AT&T Corp. v. US WEST Communications, Inc.</u> , Before the FCC, File No. 97-28	07/14/97	John L. Traylor (US WEST)	Peter H. Jacoby (AT&T) Deena M. Shetler (FCC)	ATT's Legal Department Files	Qwest's failure to provide information regarding its revenue and minutes of use
Supplemental Responses of US WEST Communications, Inc. to AT&T's First Set of Interrogatories served in <u>AT&T Corp. v. US WEST Communications, Inc.</u> , Before the FCC, File No. 97-28	08/22/97	John L. Traylor (US WEST)	Peter H. Jacoby (AT&T) Deena M. Shetler (FCC)	ATT's Legal Department Files	The terms and conditions of Qwest's agreement with Frontier regarding the provision of 1-800-4USWEST Service
AT&T Internal Data regarding minutes of use realized by its consumer calling card service	02/01	AT&T	AT&T Consumer Services Group including Card Product Management Department	ATT Market Analysis and Forecasting Files	AT&T's Damages resulting from Qwest's unlawful provision of its 1-800-4USWEST Service
AT&T Internal Data regarding its share of the consumer calling card market and the methodology used to calculate its share of the market	02/01	AT&T Market Analysis and Forecasting Department	AT&T Consumer Services Group including Card Product Management Department	AT&T Market Analysis and Forecasting Files	AT&T's Damages resulting from Qwest's unlawful provision of its 1-800-4USWEST Service
Document identifying the methodology used by AT&T to calculate its share of the market	Undated	Summit Analytics	AT&T Market Analysis and Forecasting Department	AT&T Market Analysis and Forecasting Files	AT&T's Damages resulting from Qwest's unlawful provision of its 1-800-4USWEST Service
AT&T's 1996 Income Statement regarding its domestic calling card service	12/31/96	AT&T		AT&T Card Products Management Files	AT&T's Damages resulting from Qwest's unlawful provision of its 1-800-4USWEST Service
AT&T's 1997 Income Statement regarding its domestic calling card service	12/31/97	AT&T		AT&T Card Products Management Files	AT&T's Damages resulting from Qwest's unlawful provision of its 1-800-4USWEST Service



H



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

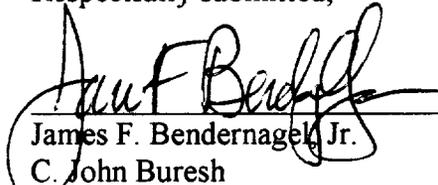
In the Matter of)	
)	
AT&T CORP.,)	
)	
Complainant,)	
)	
v.)	File No. E-97-28
)	
QWEST CORPORATION)	
(f/k/a US West Communications Inc.),)	
)	
Defendant.)	
)	

Compliance with Section 1.721(a)(9) of the Commission's Rules

As required by section 1.721(a)(9) of the Commission's Rules, Complainant AT&T Corp. hereby asserts that it is unaware of any separate action that has been filed with the Commission, any court, or other government agency that is based on the same claim or same set of facts, in whole or in part, and that the supplemental complaint does not seek prospective relief identical to the relief proposed or at issue in a notice-and-comment proceeding that is concurrently before the Commission.

Respectfully submitted,

By:



James F. Bendernagel, Jr.
C. John Buresh
Valerie L. Leatherwood
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8000
(202) 736-8711 (facsimile)

Mark C. Rosenblum
Peter H. Jacoby
Aryeh S. Friedman
AT&T Corp.
295 North Maple Avenue
Room 3245H1
Basking Ridge, NJ 07920
(908) 221-4243

Counsel for Complainant AT&T Corp.

April 17, 2001



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

In the Matter of)
)
AT&T CORP.,)
)
Complainant,)
)
v.)
)
QWEST CORPORATION)
(f/k/a US West Communications Inc.),)
)
Defendant.)

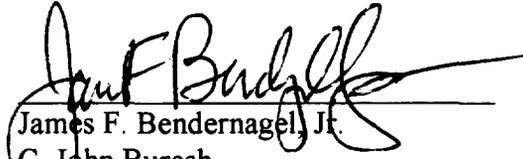
File No. E-97-28

Compliance with Section 1.721(a)(11) of the Commission's Rules

Pursuant to section 1.721(a)(11), copies of the affidavits, documents, data compilations, and tangible things in Complainant's possession, custody or control upon which that Complainant relies or intends to rely to support the facts alleged and legal arguments made in the supplemental complaint are annexed as exhibits to the supplemental complaint and have been served, along with the supplemental complaint, upon Qwest and its counsel.

Respectfully submitted,

By:



James F. Bendernagel, Jr.
C. John Buresh
Valerie L. Leatherwood
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8000
(202) 736-8711 (facsimile)

Mark C. Rosenblum
Peter H. Jacoby
Aryeh S. Friedman
AT&T Corp.
295 North Maple Avenue
Room 3245H1
Basking Ridge, NJ 07920
(908) 221-4243

Counsel for Complainant AT&T Corp.

April 17, 2001



J



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

In the Matter of)
)
AT&T CORP.,)
)
 Complainant,)
)
 v.)
)
QWEST CORPORATION)
(f/k/a US West Communications Inc.),)
)
 Defendant.)

File No. E-97-28

**AT&T'S REQUEST FOR INTERROGATORIES
TO QWEST CORPORATION**

Pursuant to 47 C.F.R. §1.72(a), Complainant AT&T Corp. hereby submits to the Commission, and concurrently serves Qwest Corporation ("Qwest"), this first request for interrogatories. Qwest shall respond to these interrogatories in the time provided by 47 C.F.R. §1.729, in writing, under oath, and in accordance with the regulations of the Federal Communications Commission ("FCC") and with the Instructions and Definitions set forth herein.

DEFINITIONS AND INSTRUCTIONS

A. These instructions and definitions require and should be construed to require answers based upon the knowledge of, and information available to, Qwest, as defined herein. These interrogatories are continuing in nature, so as to require that supplemental answers be filed promptly if further or different information is obtained with respect to any Interrogatory.

B. The term "Qwest" or "you" or "your" shall mean the Defendant herein, Qwest Corporation, its parent and each and every one of its domestic affiliates, subsidiaries and divisions and each and every one of its predecessors in interest, including US WEST Communications, Inc., and any present or former officers, directors, agents, salesmen, representatives, employees, subcontractors, joint venture partners, parties and other persons acting or purporting to act for, or on their behalf.

C. The term "Frontier" shall mean Frontier Corporation, its parent and each and every one of its domestic affiliates, subsidiaries and divisions and each and every one of its successors in interest, including Global Crossing Ltd., and any present or former officers, directors, agents, salesmen, representatives, employees, subcontractors, joint venture partners, parties and other persons acting or purporting to act for, or on their behalf.

D. The term "person" shall mean any natural person, partnership, corporation, or other business entity and all present and former officers, directors, agents, salesmen, representatives, employees and other acting or purporting to act on behalf of such person.

E. The term “document” shall include, without limitation, any writing, tape recording or any other tangible thing or data compilation in the custody, possession or control of Qwest – whether printed, typed, recorded, reproduced by an process, written or produced by hand, including any graphic matter however, produced or reproduced, or produced by any other mechanical means. The term “document” includes electronically-stored data from which information can be obtained either directly or by translation through detection devices or readers. The term “document” also includes the original document (or a copy thereof if the original is not available), all drafts, whether or not they result in a final document, and all copies which differ in any respect from the original, including any notation, underlining, marking, or information not on the original.

F. The term “identify,” when used with respect to any individual, shall mean to state the person’s full name; present position and business affiliation, if known; past business affiliation, if any; and current or last known addresses and telephone numbers.

G. The term “identify,” when used with respect to a business entity, shall mean to furnish the business entity’s name and address.

H. The term “identify,” when used with respect to a written communication, shall mean to state the date of the communication; name and title of the author(s), addressee(s), and/or any person who received a copy of the document; type of document (e.g. letter); and to identify its last known custodian and location. Written communications include electronic documents.

I. The term “identify,” when used with respect to an oral communication, means to identify any and all persons who participated in the communication, the date of the communication and the substance of the communication.

J. The word “and” as well as “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the specification all responses which might otherwise be construed to be outside its scope. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.” “Any” shall be construed to include the word “all” and “all” shall be construed to include the word “any.”

K. The use of a verb in any tense shall be construed as the use of the verb in all other tenses, whenever necessary to bring within the scope of the specification all responses which might otherwise be construed to be outside its scope.

L. A plural noun shall be construed as a singular noun and a singular noun shall be construed as a plural noun, whenever necessary to bring within the scope of the specification all responses which might otherwise be construed to be outside its scope.

M. Each interrogatory and subpart, if any, shall be responded to separately and fully. If you object to any request or subpart, state the basis for the objection in detail. If you object to any portion of any interrogatory, answer all other portions of that interrogatory.

N. When the information requested by an interrogatory varies over time, state the response for each period of time as to which the response differs, and identify the time periods applicable to each portion of the response.

O. Identify all persons who provided information used in answering each interrogatory. Such identification should include the full name, present address, telephone number, occupation, title, employer and organizational unit for each such person, as well as identification of the information provided by such person.

P. Except when specific reference is made to another interrogatory, each interrogatory herein should be construed independently and not by reference to any other paragraph for the purpose of limitation.

Q. If any information called for by any interrogatory is withheld because you claim that such information is contained in a privileged document and/or communication, identify the nature of the privilege claimed, the person or persons who prepared the privileged document, all recipients of the privileged document, the general subject matter of the document, the identity and relationship of all persons who either prepared or received the document, and the date of the document.

R. If you respond to any Interrogatory by specifying and/or producing Documents, you shall specify the Documents by using the production numbers of the Documents.

INTERROGATORIES

Interrogatory No. 1

Identify all persons who have knowledge about the terms and conditions of any and all agreements between Qwest and Frontier relating to the provision of 1-800-4USWEST Service, including, but not limited to, Frontier's Pricing Schedule (attached as Exhibit A to the Supplemental Responses of US WEST Communications, Inc. to AT&T's First Set of Interrogatories and attached hereto as Exhibit A for your convenience).¹

¹ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

Interrogatory No. 2

For the period April 1997 to the present, identify, on a monthly basis, all revenue, compensation, benefits or advantages (whether pecuniary or non-pecuniary) Qwest has received from any source relating to the 1-800-4USWEST Service and whether those revenues are attributable to in-region InterLATA calls, out-of-region InterLATA calls or in-region IntraLATA calls. Identify, as used here, requires you to state the circumstances under which such compensation was received or paid (including without limitation the date or dates on which such compensation, benefit, or advantage was offered and received); the nature and amount of such compensation, benefit or advantage; the good or services for which such compensation, benefit or advantage was paid; or any other reason that caused (either directly or indirectly) that compensation, benefit or advantage to be paid.²

Interrogatory No. 3

For the period April 1997 to the present, identify, on a monthly basis, all revenue, compensation, benefits or advantages (whether pecuniary or non-pecuniary) Frontier has received from any source relating to the 1-800-4USWEST Service and whether those revenues are attributable to in-region InterLATA calls, out-of-region InterLATA calls or in-region IntraLATA calls. Identify, as used here, requires you to state the circumstances under which such compensation was received or paid (including without limitation the date or dates on which such compensation, benefit, or advantage was offered and received); the nature and amount of such compensation, benefit or advantage; the good or services for which such compensation,

² Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

benefit or advantage was paid; or any other reason that caused (either directly or indirectly) that compensation, benefit or advantage to be paid.³

Interrogatory No. 4

Identify all communications (whether written, oral or electronic) between Qwest and Frontier that refer or relate to the 1-800-4USWEST Service.⁴

Interrogatory No. 5

Identify all persons with knowledge of the revenues, compensation, benefits or advantages (whether pecuniary or non-pecuniary) realized from the provision of the 1-800-4USWEST Service.⁵

Interrogatory No. 6

For the period April 1997 to the present, identify, on a monthly basis, the number of messages and minutes that were generated by the 1-800-4USWEST Service, state whether the messages and minutes were in-region InterLATA calls, out-of-region InterLATA calls or

³ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

⁴ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

⁵ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

in-region IntraLATA calls and identify, on a monthly basis, the average length of call for each call category and the average revenue per minute.⁶

Interrogatory No. 7

Identify all persons with knowledge of the number of messages and minutes of calls generated between April 1997 and the present using the 1-800-4USWEST Service.⁷

Interrogatory No. 8

For the period April 1997 to the present, identify the total number of 1-800-4USWEST calling cards that have been distributed by Qwest and/or Frontier and state, on a month by month basis, the number of active cards and the average revenue per card.⁸

Interrogatory No. 9

Identify all documents evaluating or assessing the market for Qwest's 1-800-4USWEST Service as well as the expected impact of that service on AT&T's calling card services.⁹

⁶ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

⁷ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

⁸ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

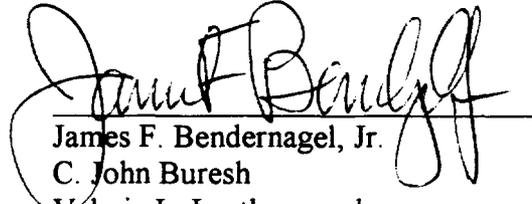
⁹ Pursuant to Rule 1.729(b), this interrogatory is necessary because it will lead to evidence regarding the damages AT&T has suffered as a result of Qwest's unlawful conduct. Such information is not available from any other source.

Interrogatory No. 10

Identify all documents assessing damages suffered by AT&T as result of Qwest's
1-800-4USWEST Service.

Respectfully submitted,

By:



James F. Bendernagel, Jr.
C. John Buresh
Valerie L. Leatherwood
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8000
(202) 736-8711 (facsimile)

Mark C. Rosenblum
Peter H. Jacoby
Aryeh S. Friedman
AT&T Corp.
295 North Maple Avenue
Room 3245H1
Basking Ridge, NJ 07920
(908) 221-4243

Counsel for Complainant AT&T Corp.

April 17, 2001

