BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint by DPI-Teleconnect, L.L.C.)
against BellSouth Telecommunications, Inc.)   Docket No. 050863-TP
for dispute arising under interconnection)   Filed: March 7, 2008
agreement)
_____)

DIRECT TESTIMONY OF STEVEN TEPERA

1 **Q: Please state your name and address and your role in this docket.**

2 A: My name is Steven Tepera. I am an attorney working for Foster Malish &

3 Cowan, LLP. My address is 1403 West Sixth Street, Austin, Texas 78703. My firm

4 represents dPi Teleconnect, LLC ("dPi") in this matter. I analyzed AT&T's

5 responses to discovery requests concerning whether AT&T awarded its end users

6 Line Connection Charge waivers for orders identical to those made by dPi.

7 **Q: Please explain how you received the information you analyzed.**

8 A: dPi formed and served discovery requests designed to test AT&T's assertion

9 that it did not provide the Line Connection Charge Waiver to its own retail customers

10 taking just basic service plus the TouchStar Blocking Features which make up the

11 bulk of dPi's orders. AT&T was asked to:

12 Please identify any and all occurrences, on a month to month
13 basis beginning January, 2002, of an end user ordering from
14 BellSouth basic service plus any two of the three following
15 features: the call return block (bearing in North Carolina the
16 Universal Service Ordering Code ["USOC"] of "BCR"); the
17 repeat dialing block ("BRD"); and the call tracing block, and
18 "HBG" block. Please indicate what these customers were
19 charged when implementing these services, including any and
20 all recurring charges, non-recurring charges, and promotional
21 charges.

1

1   **Q:**   **How did AT&T respond?**

2   A: After a discovery dispute in which AT&T variously claimed that production

3   of documents would be either too difficult due to volume or impossible due to

4   routine deletion of old data, the Florida Commission eventually compelled

5   production of the materials requested.

6   The response came in two parts. The first set, dated September 26, 2007,

7   contained responsive data from January 2005 to August 2007. The second set, dated

8   November 7, 2007, and contained data from May 2003 through December 2005.

9   These materials were produced long after the original testimony deadlines for this

10   case, and some was produced after the hearing originally scheduled in September of

11   2007.

12   The data was extremely voluminous and dense. Together there were 1089

13   pages, each page containing thirty-three to thirty-eight lines of entries, and each line

14   containing nine to ten columns of data. Because the response was so dense, it took

15   many hours to compile the relevant totals to show whether AT&T was giving its end

16   users a Line Connection Charge waiver, and how frequently.

17   **Q:**   **What did you discover after you compiled the results?**

18   A: The methodology and results of the compilation are shown in my affidavit

19   and its attachments filed as Exhibits 6 and 7. Exhibit 6 contains the three graphs that

20   show both the total waivers given the customers and the frequency waivers were

21   given over time.

22   Exhibit 7 is my affidavit showing the methodology for my compilation and

1   analysis. Attached to this affidavit are five exhibits, labeled from 7(A) through 7(E).

2   The first three attachments to my affidavit are:

3   –   Exhibit 7(C). AT&T's responses to a discovery request to identify

4   those orders AT&T filled for its retail customers involving new

5   connections of basic service plus two of the three Touchstar Blocking

6   Features originally at issue in this case, along with the amounts those

7   customers were charged (approximately 981 pages of data) (the

8   "data");

9   –   Exhibit 7(B). A summary or tabulation of the data, performed by me;

10   and

11   –   Exhibit 7(A). A series of charts I created to display graphically the

12   results of my tabulation of the data. These charts are repeated as an

13   individual Exhibit 6.

14   The final two attachments are:

15   –   Exhibit 7(D). Correspondence from Phil Carver, attorney for AT&T,

16   dated October 29, 2007, providing a key to the codes used by AT&T

17   in the documents produced in the data; and

18   –   Exhibit 7(E). Correspondence from Phil Carver, attorney for AT&T,

19   dated November 9, 2007, explaining that the supplemental production

20   of data is only for the years 2003 and 2004.

21 **Q:**   **Please tell us about the attachments, starting with the most basic attachment**

22   **and moving to the more complex.**

1   A: I started with the data in Exhibit 7(C) (referencing the key codes provided)

2   to make the summaries shown in 7(B). In turn, I used the summaries in 7(B) to make

3   the graphs in Exhibit 7(A).

4   The first step in compiling everything was simply gathering the data the

5   AT&T provided us. The data – Exhibit 7(C) – is a true and accurate copy of an

6   excerpt from discovery responses received by Foster Malish & Cowan, LLP, on

7   behalf of dPi. Because of its size, it is attached as a compact disk. As noted above,

8   the data was provided in response to the following discovery request in Florida:

9   Please identify any and all occurrences, on a month to month basis
10   beginning January, 2002, of an end user ordering from AT&T basic
11   service plus any two of the three following features: the call return
12   block (bearing in North Carolina the Universal Service Ordering
13   Code ["USOC"] of "BCR"); the repeat dialing block ("BRD"); and
14   the call tracing block, and "HBG" block. Please indicate what these
15   customers were charged when implementing these services, including
16   any and all recurring charges, non-recurring charges, and promotional
17   charges.

18   Exhibit 7(C) consists of data produced at two different times by AT&T.

19   Although AT&T initially objected to providing the data on various grounds, it was

20   ultimately compelled by the Florida commission to provide the data requested for at

21   least part of the time period requested. Thus, on September 26, 2007, AT&T

22   supplemented its response with the requested data from January 2005 through August

23   2007 ("the first supplemental response"). A true and accurate copy of the entirety of

24   the first supplemental response, with various orders highlighted, is included in

25   Exhibit 7(C) in compact disk form.

26   On November 9, 2007, AT&T supplemented its response again with what

4

1   appeared to be data from May 2003 to December **2005** ("the second supplemental

2   response"). However, in the transfer letter from Phil Carver, it was clear that the

3   second supplemental response "contains the requested information for the time frame

4   of January 1, 2003, through December 31, **2004**." This letter is included as Exhibit

5   7(E). Thus, the 2005 data from the second supplemental response was ignored and

6   the 2005 data from the first supplemental response was used in my tabulations.[1] A

7   true and accurate copy of the 2003 and 2004 portion of AT&T's second supplemental

8   response as highlighted by me is included in the compact disk that is Exhibit 7(C) as

9   well.

10   Collectively, excluding the overlapping data from 2005, *this amounted to*

11   981 pages of data, consisting of up to 33 or 38 orders (or portions of orders) per page.

12   A true and accurate copy of a letter we received from Phil Carver, attorney

13   for AT&T, explaining the codes used in the data is attached to this affidavit as

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[1] AT&T has claimed in other states that the second set of data is more favorable to AT&T and inferred or implied some dishonest motive from dPi's ignoring the second set of 2005 data and using the first set only. However, the two data sets overlapped for year 2005 and dPi was not told to disregard or use one portion of the overlapping data sets over the other, and did not want to incur additional expense by analyzing duplicate results. In fact, AT&T's transfer letter for the second data set indicated that it was to be used only for the period ending December 2004. In any event, dPi cannot verify that the data differs significantly between the two versions produced by AT&T for 2005, because dPi fully evaluated only a single set, relying on AT&T's representation that the materials it produced were responsive to the request for information propounded. dPi's cross checking simply involved verifying that a handful of orders that appeared in one version also appeared in the second, and left it at that. But even assuming *arguendo* that AT&T's claim that the 2005 billing system data (the first data set produced for 2005) showed that the line connection charge was waived 29 percent of the time, while the ordering system data (the second data set produced for 2005) showed that the line connection charge was waived 14 percent of the time, changes nothing: we see that notwithstanding the March 2005 internal publication of AT&T internal "policy" of not "counting" these kinds of orders as qualifying for the LCCW, 14% of such orders nonetheless had the Line Connection Charge waived in 2005.

1   Exhibit 7(D).

2   Decoding the data using the keys to the abbreviations provided by Phil

3   Carver, I was able to identify those new service orders placed for:

4   (1) 1FR (that is, basic service);

5   (2) at least 2 of the Touchstar Blocking Features;

6   (3) and no other features; and

7   (4) that were not charged a line connection fee.

8   These were the retail orders that AT&T processed that fit the criteria of being

9   basic service plus two Touchstar Blocking Features and being granted the Line

10   Connection Charge waiver.

11   I counted the number of orders that met the above four criteria two times.

12   The first time, I went through the entire 981 pages of data and recorded the number

13   of orders that met the four criteria page-by-page on an Excel spreadsheet. The

14   second time through, I highlighted those that fit all four criteria. Then, on a page-by-

15   page basis, I compared the number of orders on the Excel spreadsheet with the

1   number of highlighted lines. If any discrepancy arose, I recounted on that page.[2]

2   I then took the information from 7(C) and created the next higher level

3   analysis, which is contained in 7(B).

4   Exhibit 7(B) is simply the record of the tabulations discussed above, and is

5   a true and correct copy of the summaries of data I created. Thus, for Exhibit 7(B),

6   I collected the results of my work as described above in an Excel spreadsheet. The

7   first page of Exhibit 7(B) shows a summary of the months of data from May 2003 to

8   August 2007. It is a summation of the remaining pages of Exhibit 7(B).

9   The remaining pages of Exhibit 7(B) are my page-by-page tabulations of the

10   data provided in Exhibit 7(B) grouped by month, with each entry showing the bates

11   stamp page number of the data page being evaluated, the total number of orders on

12   that page, and the total number of orders on that page receiving the waiver.

13   The final level of analysis is contained in Exhibit 7(A), and reproduced as

14   Exhibit 6. These are the graphs that show the numbers and trends of awards of Line

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[2] By way of example of how the tabulation was done, refer to the first page of Exhibit 7(C), Bates stamped 000001. Per the letter of Phil Carver, orders that had their line connection charge waived were indicated by a WNR, WLC, or WSO (collectively, "W codes") in column 6, titled "Account Waiver Code." For instance, on 000001, seven lines are highlighted which have W codes. However, in some cases, AT&T reproduced the same order twice (presumably because two different W codes were applied to the same account); see e.g., the fourth and fifth highlighted lines, and the sixth and seventh highlighted lines. These entries were only counted once, as indicated by the hand-drawn bracket indicating that those two lines are to be counted as one order. Also, some orders were not counted at all if either a subsequent order showed the customer taking additional features later (*see e.g.*, p. 000002, lines 24 and 25 (line 25 shows account in line 24 taking "ESX" or call waiting)), or if the order showed that it was not an order for basic service (*see e.g.*, p. 000002, line 15 ("1FRCL" means Caller I.D. was on the line); and line 16 ("NXMCR" is an order for Basic Service plus Caller ID Deluxe with Anonymous Call Rejection)). Ultimately, the total number of qualifying orders on each page were noted on the bottom right hand corner of the page. I did this for each of the 981 pages of orders.

1   Connection Charge waivers. Exhibit 7(A) and Exhibit 6 contain true and correct

2   copies of three graphs showing different arrangements of the data from the first page

3   of Exhibit 7(B).

4   The first chart shows the percentage of orders of 1FR + 2 Touchstar Blocks

5   awarded LCCW over time. The chart shows that waivers for such orders were issued

6   approximately 28% of the time from May 2003 to December 2004, then decline

7   sharply in early 2005, with the average for January 2005 through August 07 of

8   approximately 14%. Also included on that chart are the dates and strengths of

9   hurricanes and tropical storms in Florida. These are included to show there is no

10   apparent correlation in Florida between the presence of a storm and the frequency of

11   line connection charge waivers given to end users. This refutes AT&T's previous

12   contention made in other states that end users have their line connection charge

13   waived because they are simply reconnections of disconnections that occurred due

14   to hurricanes.

15   The second graph shows a comparison of 1FR + 2 Touchstar Blocks orders

16   per month awarded LCCW versus those not awarded LCCW. These are the raw

17   numbers, and not percentages as shown on the line graph.

18   The third chart simply shows the total numbers over the entire time period

19   under consideration. Thus, it shows that 5,052 1FR + 2 Touchstar Blocks orders

20   received LCCW, and 20,074 did not from May 2003 to August 2007.

21 **Q:**   **What are your conclusions about this data?**

22 A: All told, AT&T provided over 5000 end users with a Line Connection Charge

1		waiver from May 2003 through August 2007. Line Connection Charge waivers were
2		granted in each and every month during this time frame. The data show that the
3		award of waivers was not rare, was not intermittent, and was not accidental. The
4		graphs concisely show that not only did AT&T provide a Line Connection Charge
5		waiver to its end users with identical orders to dPi's orders, but they did it regularly
6		and systematically.
7	Q:	**Does this conclude your testimony?**
8	A:	It does for now, but I reserve the right to amend if necessary.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:	)	**DOCKET NO. 050863-TP**
	)	
dPi Teleconnect, L.L.C. v.	)	
BellSouth Telecommunications, Inc.	)	

AFFIDAVIT OF STEVEN TEPERA EXPLAINING THE METHODOLOGY OF THE CALCULATIONS FOR EXHIBIT 6 TO dPi's DIRECT TESTIMONY

Before me, the undersigned notary, on this day personally appeared Steven Tepera, a person whose identity is known to me. After I administered an oath to him, upon his oath, he said:

1. My name is Steven Tepera. I am an attorney working for Foster Malish & Cowan, LLP. My firm represents dPi Teleconnect, LLC ("dPi") in this matter. I am of legal age and sound mind, and otherwise able to make this affidavit. The facts herein are true and correct, and within my personal knowledge.

2. Exhibit 6 contains graphs that show numbers and frequency of line connection charge waivers given by AT&T to its end users from May 2003 through August 2007 in Florida. I created those graphs. This affidavit will detail the methodology and underlying data for those graphs.

3. Attached to this affidavit are five exhibits, labeled from 7(A) through 7(E). The first three attachments to this exhibit are:

    – Exhibit 7(C). AT&T's responses to a discovery request to identify those orders AT&T filled for its retail customers involving new connections of basic service plus two of the three Touchstar Blocking Features originally at issue in this case, along with the amounts those customers were charged (approximately 981 pages of data) (the "data");

    – Exhibit 7(B). A summary or tabulation of the data, performed by me; and

    – Exhibit 7(A). A series of charts I created to display graphically the results of my tabulation of the data. These charts are repeated as an individual Exhibit 6.

4. The final two attachments are:

    – Exhibit 7(D). Correspondence from Phil Carver, attorney for AT&T, dated October 29, 2007, providing the key to the codes used by AT&T in the documents produced in the data; and

1

— Exhibit 7(E). Correspondence from Phil Carver, attorney for AT&T, dated November 9, 2007, explaining that the supplemental production of data is only for the years 2003 and 2004.

ABOUT EXHIBIT 7(C), THE AT&T DATA PROVIDED IN RESPONSE TO DISCOVERY:

5. The data – Exhibit 7(C) – is a true and accurate copy of an excerpt from discovery responses with various items highlighted that was received by Foster Malish & Cowan, LLP, on behalf of dPi. Because the data is so voluminous, it is being provided in compact disk form.

6. The data was provided in response to the following discovery request in Florida:

    Please identify any and all occurrences, on a month to month basis beginning January, 2002, of an end user ordering from AT&T basic service plus any two of the three following features: the call return block (bearing in North Carolina the Universal Service Ordering Code ["USOC"] of "BCR"); the repeat dialing block ("BRD"); and the call tracing block, and "HBG" block. Please indicate what these customers were charged when implementing these services, including any and all recurring charges, non-recurring charges, and promotional charges.

7. Exhibit 7(C) consists of data produced at two different times by AT&T. Although AT&T initially objected to providing the data on various grounds, it was ultimately compelled by the Florida commission to provide the data requested for at least part of the time period requested. Thus, on September 26, 2007, AT&T supplemented its response with the requested data from January 2005 through August 2007 ("the first supplemental response"). A true and accurate copy of the entirety of the first supplemental response, with various orders highlighted, is included in Exhibit 7(C).

8. On November 9, 2007, AT&T supplemented its response again with what appeared to be data from May 2003 to December **2005** ("the second supplemental response"). However, in the transfer letter from Phil Carver, it was clear that the second supplemental response "contains the requested information for the time frame of January 1, 2003, through December 31, **2004**." This letter is included as Exhibit 7(E). Thus, the 2005 data from the second supplemental response was ignored and the 2005 data from the first supplemental response was used in my tabulations.[1] A true and accurate copy of the 2003 and 2004 portion of

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[1]

AT&T has claimed in other states that the second set of data is more favorable to AT&T and inferred or implied some dishonest motive from dPi's ignoring the second set of 2005 data and using the first set only. However, the two data sets overlapped for year 2005 and dPi was not told to disregard or use one portion of the overlapping data sets over the other, and did not want to incur additional expense by analyzing duplicate results. In fact, AT&T's transfer letter for the second data set

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AT&T's second supplemental response is included in Exhibit 7(C) as well.

9. Collectively, excluding the overlapping data from 2005, this amounted to 981 pages of data, mostly consisting of up to 33 or 38 orders (or portions of orders) per page.

10. A true and accurate copy of a letter we received from Phil Carver, attorney for AT&T, explaining the codes used in the data is attached to this affidavit as Exhibit 7(D).

11. Decoding the data using the keys to the abbreviations provided by Phil Carver, I was able to identify those new service orders placed for:

    (1) 1FR (that is, basic service);
    (2) at least 2 of the Touchstar Blocking Features;
    (3) and no other features; and
    (4) that were not charged a line connection fee.

    These were the orders that AT&T received that fit the criteria of being basic service plus two Touchstar Blocking Features and being granted the Line Connection Charge Waiver ("LCCW") promotion.

12. I counted the number of orders that met the above four criteria two times. The first time, I went through the entire 981 pages of data and recorded the number of orders that met the four criteria page-by-page on an Excel spreadsheet. The second time through, I highlighted those that fit all four criteria. Then, on a page-by-page basis, I compared the number of orders on the Excel spreadsheet with the number of highlighted lines. If any discrepancy arose, I recounted on that page.[2]

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indicated that it was to be used only for the period ending December 2004. In any event, dPi cannot verify that the data differs significantly between the two versions produced by AT&T for 2005, because dPi fully evaluated only a single set, relying on AT&T's representation that the materials it produced were responsive to the request for information propounded. dPi's cross checking simply involved verifying that a handful of orders that appeared in one version also appeared in the second, and left it at that. But even assuming *arguendo* that AT&T's claim that the 2005 billing system data (the first data set produced for 2005) showed that the line connection charge was waived 29 percent of the time, while the ordering system data (the second data set produced for 2005) showed that the line connection charge was waived 14 percent of the time, changes nothing: we see that notwithstanding the March 2005 internal publication of AT&T internal "policy" of not "counting" these kinds of orders as qualifying for the LCCW, 14% of such orders nonetheless had the Line Connection Charge waived in 2005.

2

By way of example of how the tabulation was done, refer to the first page of Exhibit7(C), Bates stamped 000001. Per the letter of Phil Carver, orders that had their line connection charge waived

ABOUT EXHIBIT 7(B), THE DATA TABULATION:
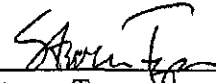
13. Exhibit 7(B) is simply the record of the tabulations discussed above, and is a true and correct copy of the summaries of data I created. Thus, for Exhibit 7(B), I collected the results of my work as described above in an Excel spreadsheet. The first page of Exhibit 7(B) shows a summary of the months of data from May 2003 to August 2007. It is a summation of the remaining pages of Exhibit 7(B).

14. The remaining pages of Exhibit 7(B) are my page-by-page tabulations of the data provided in Exhibit 7(C) grouped by month, with each entry showing the bates stamp page number of the data page being evaluated, the total number of orders on that page, and the total number of orders on that page receiving the waiver.

ABOUT EXHIBIT 7(A), THE CHARTS:

15. Exhibit 7(A) contains true and correct copies of three graphs showing different arrangements of the data from the first page of Exhibit 7(B).

16. The first chart shows the percentage of orders of 1FR + 2 Touchstar Blocks awarded LCCW over time. The chart shows that waivers for such orders were issued approximately 28% of the time from May 2003 to December 2004, then decline sharply in early 2005, with the average for January 2005 through August 07 of approximately 14%. Also included on that chart are the dates and strengths of hurricanes and tropical storms in Florida. These are included to show no apparent correlation in Florida between the presence of a storm and the frequency of line connection charge waivers given to end users. This refutes AT&T's previous contention made in other states that end users have their line connection charge waived because they are simply reconnections of disconnections that occurred due to hurricanes.

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were indicated by a WNR, WLC, or WSO (collectively, "W codes") in column 6, titled "Account Waiver Code." For instance, on 000001, seven lines are highlighted which have W codes. However, in some cases, AT&T reproduced the same order twice (presumably because two different W codes were applied to the same account); see e.g., the fourth and fifth highlighted lines, and the sixth and seventh highlighted lines. These entries were only counted once, as indicated by the hand-drawn bracket indicating that those two lines are to be counted as one order. Also, some orders were not counted at all if either a subsequent order showed the customer taking additional features later (see e.g., p. 000002, lines 24 and 25 (line 25 shows account in line 24 taking "ESX" or call waiting)), or if the order showed that it was not an order for basic service (see e.g., p. 000002, line 15 ("1FRCL" means Caller I.D. was on the line); and line 16 ("NXMCR" is an order for Basic Service plus Caller ID Deluxe with Anonymous Call Rejection)). Ultimately, the total number of qualifying orders on each page were noted on the bottom right hand corner of the page. I did this for each of the 981 pages of orders.

4

17.   The second graph shows a comparison of 1FR + 2 Touchstar Blocks orders per month awarded LCCW versus those not awarded LCCW. These are the raw numbers, and not percentages as shown on the line graph.

18.   The third chart simply shows the total numbers over the entire time period under consideration. Thus, it shows that 5,052 1FR + 2 Touchstar Blocks orders received LCCW, and 20,074 did not from May 2003 to August 2007.

                                                          _____
                                                          Steven Tepera

Further affiant sayeth not.

Sworn to and subscribed before me by Steven Tepera on March 5, 2008.
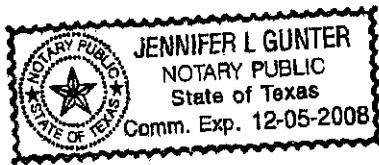
                                                          _____
                                                          Notary Public in and for
                                                          The State of Texas

                                                          My commission expires: 12/05/08

dPi-FL Exhibit 7(A)
Charts showing frequency of AT&T's award of Line
Connection Charge Waiver

BellSouth Retail: Percent 1FR + 2 Blocks Orders Given LCCW Over Time

Hurricane Frances (Sept. 5)

Hurricane Jeanne (Sept. 25)

— Average Percentage 2003-2004

— Average Percentage 2005-2007

Hurricane Charley (Aug. 13-14)

Those not receiving LCCW promotion include, for example: new accounts as opposed to reacquisitions and winovers, splitting of existing accounts, and re-establishment of previously disconnected service.

Hurricane Wilma (Oct. 24)

Hurricane Katrina (Aug. 25-26)

May 2005: BellSouth issues written guidelines memorializing its new policy that the Touchstar Blocking Features (BCR, BRD, HBG) cannot be used to qualifty for LCCW

Percent

Hurricane Strength in Florida

Charley (a category 4 storm) passed through Florida August 13-14, 2004, from Punta Gorda on the Southwest coast to Orlando on the Mideast coast.

Frances (a category 2 storm) passed through Florida September 4 and 5, 2004, from near Sewall's Point on the east coast to Tampa on the Gulf, then up through the panhandle at St. Marks on September 5.

Jeanne (a category 3 storm) passed through Florida September 25, 2004, closely following Frances' path from the East coast till it reached Pasco County near the middle of the peninsula, where it went North up the middle of the state.

Katrina (a category 1 storm) passed over southern Florida and the Keys August 25 and 26.

Wilma (a category 4 storm) passed over southern Florida on October 24, 2005.

BellSouth Retail:
Comparison of 1 FR + Blocks Granted v. Not Granted Waiver Over Time

■ 1 FR + Blocks given LCCW

□ 1FR + Blocks Orders not given LCCW

Those not receiving LCCW promotion include, for example: new accounts as opposed to reacquisitions and winovers, splitting of existing accounts, and re-establishment of previously disconnected service.

Number of Orders

Month

BellSouth's end users in Florida
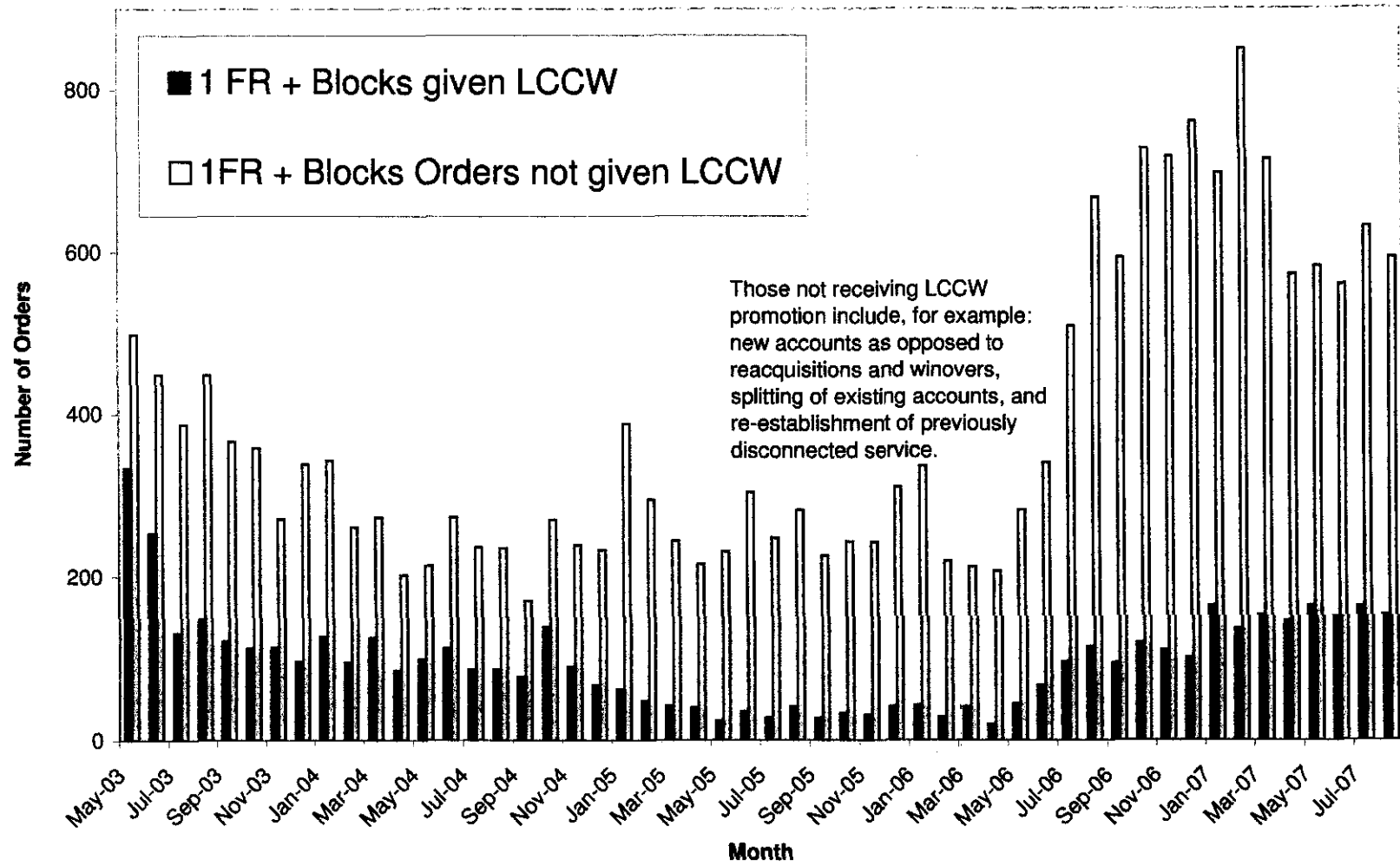
BellSouth Retail: Comparison of 1FR + 2 Blocks Orders Granted v. Not Granted LCCW

Those not receiving LCCW promotion include, for example: new accounts as opposed to reacquisitions and winovers, splitting of existing accounts, and re-establishment of previously disconnected service.

■ Orders Awarded Waivers

■ Orders Denied Waivers

■5052

Includes 2,987 waivers granted before Pam Tipton first testified that BellSouth did not award LCCW to its end users with basic service plus two call blocks.

■20074

BellSouth's end users in Florida
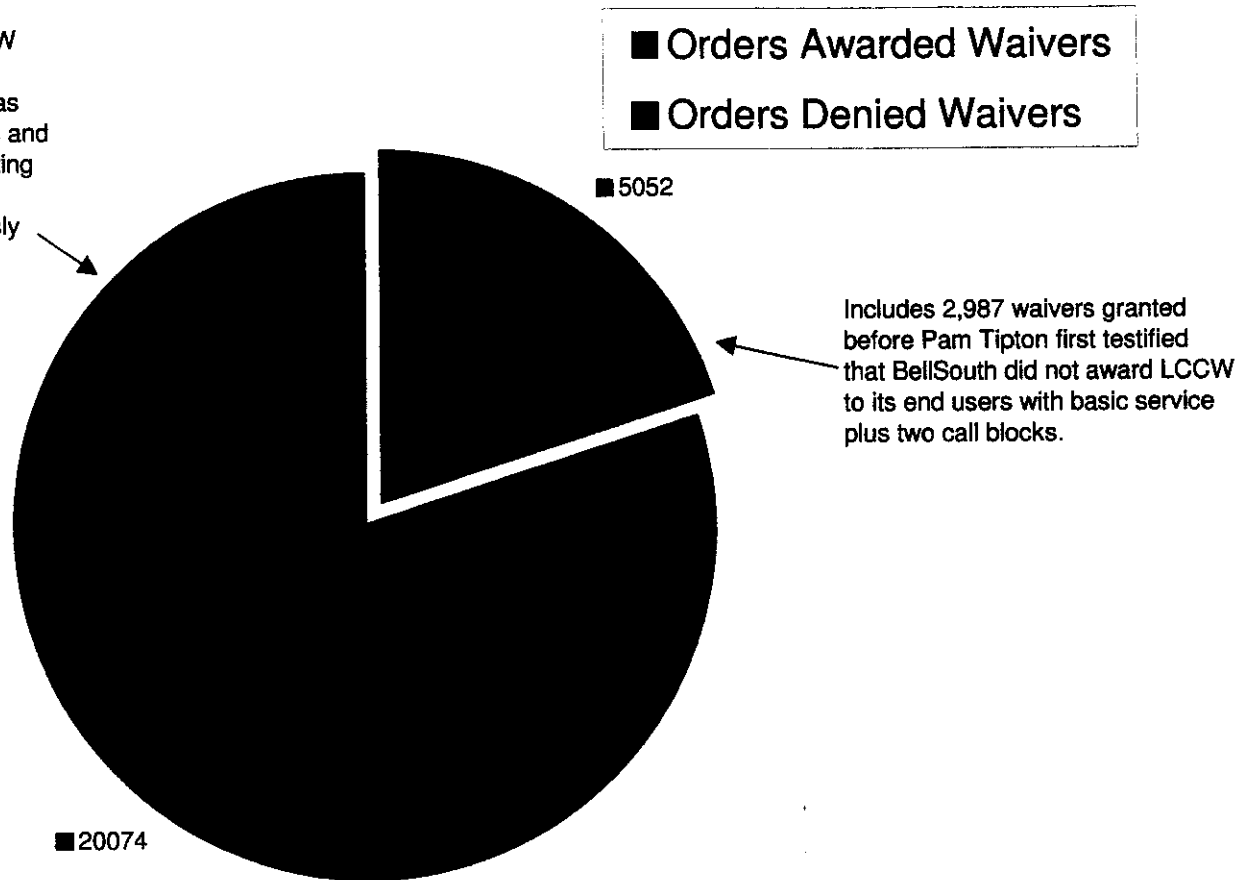
dPi-FL Exhibit 7(B)
Compilation of data from AT&T's response to request for
information regarding AT&T's award of Line Connection
Charge Waiver

Percentages

Month	Number of Waivers	Number of orders of 1FR + 2 or more blocks	Percent awarded
May-03	333	831	40.07%
Jun-03	255	782	36.04%
Jul-03	131	518	25.29%
Aug-03	148	596	24.83%
Sep-03	121	487	24.85%
Oct-03	112	450	25.65%
Nov-03	113	384	29.43%
Dec-03	96	434	22.12%
Jan-04	105	410	25.37%
Feb-04	95	351	25.69%
Mar-04	125	398	31.41%
Apr-04	85	287	29.62%
May-04	90	385	23.63%
Jun-04	112	505	20.99%
Jul-04	86	322	26.71%
Aug-04	86	321	26.79%
Sep-04	77	247	31.17%
Oct-04	108	405	33.82%
Nov-04	90	329	27.36%
Dec-04	67	300	22.33%
Jan-05	68	450	18.78%
Feb-05	48	343	13.99%
Mar-05	42	286	14.69%
Apr-05	40	256	15.63%
May-05	28	265	9.41%
Jun-05	35	339	10.32%
Jul-05	27	275	9.82%
Aug-05	41	323	12.69%
Sep-05	27	255	10.67%
Oct-05	33	276	11.96%
Nov-05	31	273	11.36%
Dec-05	41	351	11.68%
Jan-06	43	379	11.35%
Feb-06	28	247	11.34%
Mar-06	41	253	16.21%
Apr-06	20	227	8.81%
May-06	45	327	13.76%
Jun-06	67	407	16.46%
Jul-06	96	605	15.87%
Aug-06	114	782	14.58%
Sep-06	94	688	13.66%
Oct-06	119	847	14.05%
Nov-06	110	828	13.29%
Dec-06	101	862	11.72%
Jan-07	164	862	19.03%
Feb-07	136	987	13.78%
Mar-07	153	868	17.63%
Apr-07	146	719	20.31%
May-07	164	747	21.95%
Jun-07	151	712	21.21%
Jul-07	163	795	20.50%
Aug-07	153	747	20.48%

Bates Number	Waivers	Date	1FR + Blocks
000001	5		31
000002	4		29
000003	10		20
000004	6		26
000005	2		32
000006	3		28
000007	5		28
000008	6		23
000009	2		26
000010	5		30
000011	5		26
000012	9		29
000013	4		26
000014	6		29
000015	6		27
000016	4		26
000017	4		22
000018	2		23
000019	3		31
000020	5		25
000021	10		26
000022	5		21
000023	3		25
000024	6		31
000025	9		30
000026	6		21
000027	7		23
000028	8		26
000029	3	Aug-07	7
000030	6		27
000031	9		28
000032	4		28
000033	2		27
000034	6		29
000035	8		26
000036	5		33
000037	8		31
000038	5		29
000039	9		33
000040	6		31
000041	5		33
000042	8		22
000043	5		20
000044	6		31
000045	4		25
000046	7		32
000047	4		33
000048	7		33
000049	10		29
000050	6		22
000051	4		25

Bates Number	Waivers	Date	1FR + Blocks
000052	2		31
000053	7		33
000054	3		26
000055	10		28
000056	4		25
000057	3	Jul-07	25
000058	8		28
000059	8		28
000060	9		31
000061	8		32
000062	7		27
000063	5		32
000064	4		33
000065	5		28
000066	4		26
000067	7		27
000068	6		28
000069	6		26
000070	4		21
000071	5		25
000072	6		31
000073	6		25
000074	4		33
000075	8		33
000076	3		31
000077	2		27
000078	7		33
000079	8		26
000080	8		32
000081	5		31
000082	8	Jun-07	18
000083	3		31
000084	7		21
000085	8		28
000086	2		25
000087	6		33
000088	6		29
000089	5		22
000090	5		30
000091	4		27
000092	5		28
000093	3		30
000094	5		26
000095	7		32
000096	12		28
000097	6		32
000098	6		30
000099	5		23
000100	6		32
000101	7		32
000102	5		24

Bates Number	Waivers	Date	1FR + Blocks
000103	6		22
000104	5		33
000105	7		27
000106	8		25
000107	11		30
000108	7		24
000109	7	May-07	23
000110	7		33
000111	10		27
000112	7		30
000113	4		29
000114	5		25
000115	3		31
000116	7		29
000117	7		22
000118	4		26
000119	4		25
000120	5		26
000121	3		24
000122	8		25
000123	7		20
000124	3		27
000125	6		29
000126	4		30
000127	6		33
000128	7		25
000129	4		33
000130	3		23
000131	8		33
000132	6		22
000133	8		32
000134	4		20
000135	6		31
000136	0	Apr-07	9
000137	6		30
000138	6		32
000139	5		28
000140	4		17
000141	3		23
000142	8		33
000143	4		31
000144	3		33
000145	5		30
000146	2		23
000147	6		30
000148	5		31
000149	3		31
000150	2		29
000151	6		31
000152	6		31
000153	4		20

Bates Number	Waivers	Date	1FR + Blocks
000154	3		20
000155	4		32
000156	7		29
000157	4		27
000158	5		33
000159	4		27
000160	5		30
000161	5		27
000162	5		24
000163	7		26
000164	1		27
000165	8		26
000166	6		30
000167	10		23
000168	1	Mar-07	4
000169	3		28
000170	2		32
000171	4		33
000172	2		26
000173	7		27
000174	6		31
000175	6		26
000176	4		27
000177	7		29
000178	5		20
000179	4		30
000180	0		24
000181	3		26
000182	0		23
000183	2		32
000184	1		23
000185	2		17
000186	3		20
000187	5		28
000188	3		31
000189	3		30
000190	4		27
000191	4		19
000192	6		33
000193	9		27
000194	2		29
000195	3		29
000196	3		17
000197	4		31
000198	5		23
000199	4		28
000200	6		33
000201	2		21
000202	6		31
000203	2		28
000204	2		30

Bates Number	Waivers	Date	1FR + Blocks
000205	2	Feb-07	18
000206	5		25
000207	2		31
000208	6		25
000209	5		21
000210	4		29
000211	7		32
000212	11		29
000213	7		21
000214	1		31
000215	4		29
000216	1		31
000217	2		26
000218	4		25
000219	6		28
000220	4		31
000221	8		27
000222	8		29
000223	10		30
000224	5		22
000225	3		23
000226	5		28
000227	4		25
000228	3		16
000229	1		20
000230	4		28
000231	4		32
000232	2		31
000233	1		32
000234	3		27
000235	3		29
000236	2		26
000237	2		24
000238	1		28
000239	2		22
000240	0		17
000241	3		33
000242	3		27
000243	2		28
000244	1		18
000245	3		27
000246	6		32
000247	4		20
000248	1		27
000249	1	Jan-07	14
000250	1		26
000251	6		31
000252	4		27
000253	2		22
000254	4		17
000255	4		25

Bates Number	Waivers	Date	1FR + Blocks
000256	6		26
000257	2		21
000258	2		26
000259	1		17
000260	3		33
000261	3		23
000262	2		31
000263	1		31
000264	2		30
000265	3		18
000266	2		23
000267	3		19
000268	3		30
000269	2		33
000270	4		30
000271	2		28
000272	2		20
000273	6		24
000274	6		28
000275	2		28
000276	5		19
000277	4		31
000278	2		25
000279	1		26
000280	4		29
000281	1		23
000282	4		26
000283	2	Dec-06	16
000284	6		25
000285	4		28
000286	6		31
000287	5		27
000288	2		18
000289	4		31
000290	7		28
000291	4		29
000292	2		19
000293	5		29
000294	1		15
000295	4		33
000296	4		26
000297	3		18
000298	1		27
000299	2		33
000300	9		33
000301	2		21
000302	2		26
000303	2		31
000304	3		32
000305	5		19
000306	2		29

Bates Number	Waivers	Date	1FR + Blocks
000307	2		26
000308	1		26
000309	2		25
000310	7		26
000311	1		26
000312	4		23
000313	2		30
000314	2		14
000315	4	Nov-06	24
000316	1		29
000317	3		25
000318	4		31
000319	3		29
000320	6		31
000321	2		18
000322	1		25
000323	2		24
000324	1		19
000325	3		30
000326	6		25
000327	2		26
000328	2		21
000329	8		31
000330	4		26
000331	4		28
000332	1		11
000333	4		25
000334	6		27
000335	4		26
000336	4		29
000337	3		28
000338	3		22
000339	4		31
000340	4		33
000341	4		25
000342	2		24
000343	6		26
000344	3		18
000345	4		31
000346	5		24
000347	6		29
000348	4	Oct-06	20
000349	3		29
000350	5		30
000351	2		18
000352	3		22
000353	7		31
000354	1		29
000355	1		17
000356	1		29
000357	1		23

Bates Number	Waivers	Date	1FR + Blocks
000358	3		24
000359	4		24
000360	7		24
000361	4		23
000362	4		29
000363	4		25
000364	5		29
000365	5		31
000366	3		31
000367	1		26
000368	1		25
000369	1		26
000370	3		16
000371	2		20
000372	3		13
000373	4		26
000374	7		24
000375	5		27
000376	4	Sep-06	17
000377	2		24
000378	1		20
000379	3		15
000380	9		29
000381	5		27
000382	1		23
000383	6		28
000384	5		28
000385	1		31
000386	8		23
000387	2		19
000388	4		24
000389	3		19
000390	2		33
000391	4		31
000392	2		25
000393	1		21
000394	0		28
000395	4		22
000396	4		26
000397	3		27
000398	4		24
000399	4		21
000400	3		20
000401	5		17
000402	4		31
000403	4		25
000404	4		26
000405	5		32
000406	5		26
000407	5		29
000408	1	Aug-06	8

Bates Number	Waivers	Date	1FR + Blocks
000409	4		23
000410	4		25
000411	3		24
000412	7		31
000413	5		29
000414	2		17
000415	2		27
000416	6		28
000417	6		23
000418	3		24
000419	7		25
000420	2		26
000421	5		19
000422	2		25
000423	2		25
000424	3		25
000425	7		29
000426	3		30
000427	2		25
000428	5		26
000429	2		23
000430	5		27
000431	4		26
000432	5		21
000433	0	Jul-06	2
000434	7		9
000435	3		21
000436	3		16
000437	0		25
000438	4		25
000439	4		28
000440	3		26
000441	5		25
000442	5		21
000443	8		27
000444	4		24
000445	2		25
000446	3		18
000447	0		24
000448	2		30
000449	5		27
000450	7		21
000451	2	Jun-06	15
000452	4		24
000453	5		25
000454	3		28
000455	1		14
000456	3		24
000457	8		26
000458	4		28
000459	8		24

Bates Number	Waivers	Date	1FR + Blocks
000460	1		22
000461	3		27
000462	4		25
000463	1		17
000464	0		29
000465	0	May-06	14
000466	0		27
000467	2		26
000468	2		21
000469	2		27
000470	4		24
000471	1		25
000472	4		24
000473	4		27
000474	0		16
000475	1	Apr-06	10
000476	3		20
000477	7		27
000478	4		23
000479	4		19
000480	2		24
000481	5		23
000482	6		26
000483	2		29
000484	1		26
000485	2		15
000486	5	Mar-06	21
000487	3		28
000488	2		28
000489	1		25
000490	2		24
000491	5		21
000492	4		24
000493	4		25
000494	3		25
000495	2		24
000496	1		17
000497	1	Feb-06	6
000498	2		27
000499	3		25
000500	2		21
000501	4		32
000502	1		25
000503	0		23
000504	7		23
000505	4		30
000506	2		29
000507	3		29
000508	4		28
000509	3		25
000510	2		24

Bates Number	Waivers	Date	1FR + Blocks
000511	4		21
000512	2	Jan-06	17
000513	5		29
000514	1		14
000515	2		19
000516	1		22
000517	2		28
000518	4		25
000519	4		17
000520	2		19
000521	3		25
000522	4		18
000523	4		26
000524	3		21
000525	0		13
000526	2		22
000527	2		27
000528	0		19
000529	2	Dec-05	7
000530	3		24
000531	3		22
000532	5		29
000533	1		16
000534	0		12
000535	1		20
000536	1		16
000537	3		24
000538	6		27
000539	3		19
000540	1		29
000541	4		27
000542	0	Nov-05	8
000543	1		26
000544	2		22
000545	2		25
000546	1		23
000547	3		25
000548	3		19
000549	2		25
000550	4		17
000551	2		29
000552	6		27
000553	3		17
000554	3		11
000555	1	Oct-05	10
000556	4		14
000557	0		11
000558	1		22
000559	0		17
000560	0		21
000561	3		23

Bates Number	Waivers	Date	1FR + Blocks
000562	3		13
000563	0		2
000564	5		21
000565	4		30
000566	2		26
000567	3		19
000568	0		11
000569	2	Sep-05	23
000570	2		26
000571	4		19
000572	2		17
000573	4		23
000574	2		19
000575	2		19
000576	1		17
000577	4		26
000578	3		21
000579	1		25
000580	2		17
000581	2		23
000582	4		29
000583	3		25
000584	5	Aug-05	17
000585	3		25
000586	5		22
000587	0		24
000588	4		30
000589	2		20
000590	1		21
000591	1		23
000592	1		24
000593	3		17
000594	1		31
000595	3		19
000596	3		18
000597	0	Jul-05	1
000598	5		32
000599	1		21
000600	2		24
000601	2		19
000602	2		27
000603	1		19
000604	2		16
000605	0		15
000606	5		28
000607	1		17
000608	3		24
000609	1		18
000610	1		30
000611	8		21
000612	1		21

Bates Number	Waivers	Date	1FR + Blocks
000613	0	Jun-05	7
000614	1		30
000615	3		20
000616	3		26
000617	1		25
000618	2		22
000619	1		17
000620	2		24
000621	4		22
000622	1		18
000623	3		27
000624	3	May-05	24
000625	7		22
000626	4		19
000627	3		22
000628	3		18
000629	0		17
000630	4		19
000631	5		21
000632	2		24
000633	4		30
000634	1		22
000635	5		24
000636	2	Apr-05	18
000637	1		16
000638	3		25
000639	1		27
000640	6		23
000641	3		15
000642	6		24
000643	3		20
000644	1		13
000645	3		24
000646	3		29
000647	0		19
000648	5		24
000649	7		26
000650	0	Mar-05	1
000651	7		25
000652	7		21
000653	2		24
000654	3		20
000655	1		24
000656	3		27
000657	1		20
000658	4		27
000659	4		23
000660	1		19
000661	5		21
000662	2		23
000663	3		23

Bates Number	Waivers	Date	1FR + Blocks
000664	3		28
000665	1		15
000666	1	Feb-05	3
000667	3		22
000668	2		20
000669	2		19
000670	2		26
000671	1		25
000672	6		31
000673	3		25
000674	2		13
000675	5		25
000676	1		22
000677	4		21
000678	5		26
000679	5		30
000680	3		23
000681	2		25
000682	3		32
000683	9		32
000684	3		26
000685	1	Jan-05	7

Bates Number	Waivers	Date	1FR + Blocks
000001	8		23
000002	12		26
000003	8		25
000004	16		32
000005	12		28
000006	14		30
000007	10		30
000008	13		21
000009	13		30
000010	11		26
000011	13		29
000012	10		25
000013	13		27
000014	10		27
000015	10		29
000016	11		25
000017	10		27
000018	5		26
000019	8		27
000020	11		26
000021	10		28
000022	13		27
000023	10		27
000024	14		28
000025	6		28
000026	13		26
000027	8		26
000028	15		29
000029	10		26
000030	10		29
000031	6	May-03	18
000031	3		8
000032	8		28
000033	10		28
000034	15		26
000035	8		28
000036	12		31
000037	11		26
000038	13		25
000039	10		29
000040	11		30
000041	7		27
000042	12		32
000043	8		31
000044	7		30
000045	10		33
000046	13		31
000047	14		34
000048	13		29
000049	10		28
000050	14		29

Bates Number	Waivers	Date	1FR + Blocks
000051	8		28
000052	10		27
000053	10		30
000054	8		31
000055	8	Jun-03	23
000055	2		8
000056	8		27
000057	8		33
000058	8		31
000059	1		27
000060	8		28
000061	6		28
000062	4		30
000063	6		27
000064	6		26
000065	5		24
000066	7		28
000067	6		27
000068	9		25
000069	10		28
000070	13		32
000071	9		25
000072	5		26
000073	6		29
000074	4	Jul-03	9
000074	7		21
000075	9		25
000076	7		28
000077	8		31
000078	6		27
000079	8		31
000080	9		29
000081	11		30
000082	2		23
000083	9		27
000084	7		27
000085	8		30
000086	12		33
000087	5		29
000088	3		23
000089	7		26
000090	8		30
000091	6		26
000092	7		35
000093	7		34
000094	1		25
000095	1	Aug-03	6
000095	5		21
000096	6		32
000097	6		27
000098	5		28

Bates Number	Waivers	Date	1FR + Blocks
000099	9		32
000100	6		26
000101	7		26
000102	11		32
000103	5		28
000104	7		27
000105	8		24
000106	6		27
000107	11		30
000108	4		31
000109	8		34
000110	5		25
000111	10		31
000112	2	Sep-03	6
000112	7		20
000113	2		12
000114	4		19
000115	8		24
000116	9		24
000117	8		29
000118	2		24
000119	7		27
000120	2		23
000121	4		15
000122	20		36
000123	5		26
000124	4		24
000125	7		27
000126	7		31
000127	3		28
000128	5		29
000129	1		31
000130	7	Oct-03	21
000130	4		7
000131	14		31
000132	8		31
000133	11		28
000134	7		27
000135	11		31
000136	8		32
000137	8		29
000138	9		29
000139	6		31
000140	4		32
000141	12		30
000142	7		32
000143	4	Nov-03	14
000143	3		19
000144	14		29
000145	7		28
000146	6		32

Bates Number	Waivers	Date	1FR + Blocks
000147	8		28
000148	4		33
000149	8		30
000150	10		31
000151	4		31
000152	8		32
000153	1		31
000154	9		33
000155	4		30
000156	9		32
000157	1	Dec-03	15
000157	4		19
000158	5		33
000159	7		33
000160	11		31
000161	6		25
000162	6		30
000163	18		36
000164	10		32
000165	13		31
000166	5		29
000167	7		36
000168	6		32
000169	10		31
000170	10		31
000171	6		31
000172	2	Jan-04	9
000172	4		22
000173	5		29
000174	7		29
000175	9		28
000176	10		29
000177	12		33
000178	8		33
000179	9		32
000180	9		31
000181	9		33
000182	7		28
000183	6	Feb-04	29
000183	0		2
000184	9		24
000185	7		27
000186	12		33
000187	11		31
000188	11		30
000189	7		35
000190	6		26
000191	10		32
000192	6		31
000193	7		29
000194	14		34

Bates Number	Waivers	Date	1FR + Blocks
000195	10		28
000196	14		32
000197	1	Mar-04	4
000197	8		24
000198	7		30
000199	10		26
000200	7		28
000201	6		29
000202	7		25
000203	12		29
000204	15		33
000205	6		31
000206	6		28
000207	1	Apr-04	4
000207	11		29
000208	9		26
000209	10		29
000210	10		32
000211	10		32
000212	12		33
000213	11		33
000214	9		33
000215	5		32
000216	11		33
000217	1	May-04	1
000217	13		31
000218	9		28
000219	8		30
000220	4		32
000221	8		31
000222	6		28
000223	9		28
000224	9		33
000225	0		32
000226	10		29
000227	15		30
000228	13		29
000229	8	Jun-04	24
000229	0		5
000230	9		32
000231	6		32
000232	9		32
000233	10		32
000234	13		33
000235	9		32
000236	12		33
000237	8		31
000238	3		31
000239	6		28
000240	1	Jul-04	1
000240	10		30

Bates Number	Waivers	Date	1FR + Blocks
000241	11		34
000242	9		30
000243	13		32
000244	9		34
000245	8		31
000246	2		31
000247	6		31
000248	7		29
000249	11		31
000250	0	Aug-04	8
000250	9		22
000251	12		33
000252	7		30
000253	11		28
000254	5		32
000255	7		33
000256	7		26
000257	12		30
000258	7	Sep-04	13
000258	3		9
000259	4		25
000260	9		26
000261	23		34
000262	15		36
000263	23		34
000264	4		26
000265	14		33
000266	10		22
000267	4		28
000268	9		26
000269	4		24
000270	6		27
000271	4		21
000272	2		24
000273	4	Oct-04	13
000273	7		12
000274	10		24
000275	6		22
000276	4		20
000277	8		27
000278	7		30
000279	8		32
000280	6		28
000281	8		34
000282	5		33
000283	9		30
000284	9		30
000285	3	Nov-04	7
000285	9		20
000286	8		26
000287	10		34

Bates Number	Waivers	Date	1FR + Blocks
000288	7		29
000289	6		30
000290	12		35
000291	4		30
000292	2		26
000293	2		32
000294	6		34
000295	1	Dec-04	4

dPi-FL Exhibit 7(C)
AT&T's response to request for information regarding the
award of Line Connection Charge waiver with orders
highlighted which were not charged a line connection fee.
(submitted in compact disk form)
[PROPRIETARY]

dPi-FL Exhibit 7(D)
Letter from Phil Carver explaining codes used in response to
request for information.

at&t

J. Phillip Carver
Senior Attorney
Legal Department

AT&T South
150 South Monroe Street
Suite 400
Tallahassee, FL 33201

T: 404.335.0710
F: 404.614.4054
j.carver@att.com

October 29, 2007

Christopher Malish, Esq.
Foster Malish & Blair, L.L.P.
1403 West Sixth Street
Austin, TX 78703

Re: Docket No. 050863-TP; dPi Teleconnect , L.L.C. v. BellSouth
Telecommunications, Inc. before the Florida Public Service Commission

Dear Chris,

In response to your letter, dated October 8, 2007, AT&T Florida provides below the answers to your questions regarding the information produced in response to dPi's Request No. 1-19. As an initial matter, you state in the letter that dPi is seeking information regarding initial service orders. That is what AT&T produced. The information is not, as you appear to believe, a record of monthly recurring activity for subscribers to service consisting of 1FR + blocks. (See, pp. 1-2). Again, these are only the initial orders. Beyond this, the specific answers to your questions are as follow:

(1) [I]n general, what AT&T contends the spreadsheet is showing (e.g., "every one of these orders shows an instance where a retail customer orders new basic service with two or more of the blocks.....")

AT&T Response: The spreadsheet provided to dPi on September 26, 2007 identifies each new order AT&T received from January 2005 through August 2007 that had a basic residential line and at least 2 of the 3 requested call blocks (BCR, BRD and/or HBG). Some of these orders also included features, in addition to blocks, and this information is provided as well.

AT&T was able to identify new orders because AT&T utilizes an order number naming nomenclature that aligns with the activity being performed. Order numbers beginning with an "N" indicate a "new account" and are used anytime a billing account is being established. This may include either a brand new account (e.g. new customer, split billing of existing account, or reacquisition/win over) or the re-establishment of a previously disconnected account (e.g. disconnection in error, re-establishment after force majeur, re-establishment following disconnect for non-pay).

Not all new orders are reacquisitions. Further, AT&T has not yet been able to determine which of the new orders are submitted by reacquisition or win-over customers. We have produced all new orders because that is what you requested. However, the new orders that were not submitted by reacquisition or win over customers are not part of the universe of retail orders that would qualify for the Line Connection Charge Waiver.

The spreadsheet also identifies whether the order has a waiver code to waive certain non-recurring charges, and includes a partial listing of certain Touchstar services or custom calling features that were identifiable on the service order. Waiver codes may be listed multiple times for a particular service order, but will only be applied once for the entire service order. In the event the waiver code is placed in the Bill Section, that code will appear in the Account Waiver Code column adjacent to every appearance of the order number, regardless of whether that waiver code applies to that particular nonrecurring charge on the service order. For example, "WSO" only waives the line connection charge or the secondary service order charge, but does not waive any other nonrecurring charges.

Finally, the spreadsheet provides a column that identifies the recurring charges associated with a particular service or feature. In some instances, blanks appear in this column. The reasons for these blanks are explained below.

(2)   [T]he information AT&T believes is reflected under each of the columns (an explanation of the headings);

AT&T Response: Several of the column headings include the term "USOC," which stands for "Uniform Standard Ordering Code". AT&T utilizes USOCs for ordering different services and features and each service and feature is assigned a unique identifying USOC.

The following is an explanation of each column heading:

Month/Year:...........................Lists the Month and Year of a particular service order
Account Number:....................Lists the Account Number associated with the service order

BCOS:....................................Means "Basic Class of Service" and identifies the specific USOC
                                            that the customer ordered. This column includes only basic
                                            residential USOCs;
Order Number:.......................Provides the service order number. All service orders listed are
                                            "N" orders (i.e., new accounts). These represent customers who
                                            are establishing a new billing arrangement with AT&T. As
                                            mentioned above, AT&T is not able to separately identify
                                            reacquisition and win-over customers in this list.
ADDED Blocked
USOC Combination:..............Lists 2 or 3 of the specific Call Blocks that were present on the
                                            service order. The specific USOCs are BCR, BRD and/or HBG.
Account Waiver Code:...........Identifies whether a particular waiver code was entered into the bill
                                            section of the service order. (See Note Below.)

Service or Feature USOC.......Lists certain USOCs, either services or features, included in the
service order.
USOC Waiver Code...............Identifies whether a particular waiver code was associated with a
particular USOC on the service order.
USOC Revenue.........................Provides the monthly recurring charges associated with each
individual USOC.

Nonrecurring charges can be waived by either of the following methods: an entry in the bill
section of the order or an entry immediately adjacent to a particular USOC. Use or placement of
certain waiver codes has the same practical effect, regardless of where it is placed on the service
order. A description of waiver codes is below.

(3)   [W]hat it means if there is a blank as opposed to an entry in a particular place (does
        it always mean the same thing? Could it mean more than one thing? E.g., "the fact
        that there is a blank in the Account Waiver Code Column does not necessarily mean
        that nothing was waived, just that there was not a code for the waiver");

AT&T Response: There are two separate reasons that blanks appear on the provided
spreadsheet. Some blanks are associated with the waiver code columns (both the Account
Waiver Code column and the USOC Waiver Code column). Blanks also appear in the USOC
Revenue column. AT&T will address these separately.

        Under the Account Waiver Code column and the USOC Waiver Code column, a blank
means that non-recurring charges were not waived. If there is an entry in the column, it means
that certain non-recurring charges were waived. As discussed above, in the event the waiver was
entered into the bill section that code will appear in the Account Waiver Code column adjacent
to every appearance of the order number, regardless of whether that waiver code applies to that
particular nonrecurring charge.

        As to the second type of blank, the "USOC Revenue" column is populated with data
drawn from a static table within the database that is refreshed at the end of each month. This was
the only method by which AT&T could be responsive to dPi's request for recurring charges.
This column matches the USOC listed in the "Service or Feature USOC" column from a
particular service order with the monthly snapshot of the charges associated with the account
number provided on the service order. If the USOC listed in the "Service or Feature USOC"
column is no longer included in the billing data field in the static table, the system produces a
blank (i.e., $ -). This occurs when a customer establishes service on a particular day and then
subsequently changes the ordered services/features (on a separate billing order). This type of
change will eliminate or remove the type of service being billed, and thus nullify the
services/features included in the initial "N" order.
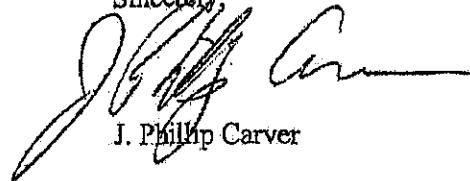
(4)   [T]he acronyms used in the spreadsheet.

Below is a chart of each acronym that is included in the spreadsheet and the description of the
acronym

Acronym	Description of Acronym
1FR	Flat rate line, residence
1FRCL	Flat rate line, residence with Caller ID
999VM	BellSouth Essentials, Credit Plan with BellSouth Voice Mail
BCR	TouchStar, call return, usage based blocking
BRD	TouchStar, repeat dialing, usage based blocking
BSCOS	Basic Class of Service
BVMRP	BellSouth Voice Mail, Residential Premium Mailbox
BVMRV	BellSouth Voice Mail, each mailbox
DRS	RingMaster Service, residence and business RingMaster I
DRS1X	RingMaster Service, residence and business RingMaster II, first additional telephone number with distinctive ringing, per line
DRS2X	RingMaster Service, residence and business RingMaster II, second additional telephone number with distinctive ringing, per line
ESC	Three way calling (non-packaged)
ESL	Speed calling (8 code) (non-packaged)
ESM	Activation/deactivation of call forwarding (non-packaged)
ESX	Call Waiting, per line,
ESXD9	Call Waiting, per line, deluxe, with conferencing, for Call Forward don't answer subscribers
ESXDC	Call Waiting, per line, deluxe, with conferencing
GCE	Call forwarding busy line, per CO line equipped
GCJ	Call forwarding don't answer, per CO line equipped
GCJRC	Call forwarding don't answer, per CO line equipped ring control
GCZ	Call forwarding, variable, remote activation, per line equipped
HBG	Denial of call tracing, per activation (where universal call tracing is activated)
HBY	Anonymous call rejection, per line
MBBRX	MemoryCall Answering Service, residence per month, each mailbox
MWW	Message waiting indication
MWWAV	Message waiting indication audio/visual
NSD	Caller ID, basic, number delivery, per line
NSQ	Repeat Dialing
NSS	Call Return, per line
NST	Call Tracing, per line
NSY	Call Block, per line
NXMCR	Caller ID Deluxe (name and number delivery), per line with Anonymous Call Rejection (ACR)

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Acronym	Description of Acronym
PMX1R	Privacy Director(r) Service, residence, per line
USOC	Uniform Service Ordering Code
WLC	Waives only the Line Connection Charge
WNR	Waives all Non-Recurring Charge
WSO	Waives the Line Connection Charge or the Secondary Service Charge
VR5	Area Plus Service, residence, 40 mile radius (FL)
VR5CL	Area Plus Service, residence, 40 mile radius (FL) with Caller ID

I believe that the foregoing addresses all of your questions.

Sincerely,

J. Phillip Carver

cc: Lee Eng Tan

dPi-FL Exhibit 7(E)
Transfer letter for November 9, 2007, response to request for information.

J. Phillip Carver
Senior Attorney
Legal Department

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: 404.335.0710
F: 404.614.4054
j.carver@att.com

November 9, 2007

VIA U.S. MAIL AND
ELECTRONIC MAIL

Christopher Malish
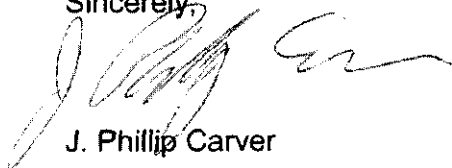Foster Malish Blair & Cowan LLP
1403 West Sixth Street
Austin, TX 78703

> **Re:** **Docket No. 050863-TP**: **dPi Teleconnect, L.L.C. v. BellSouth**
> **Telecommunications, Inc.**

Dear Mr. Malish:

Attached is AT&T Florida's Supplemental Response to dPi's First Request for Information, No. 1-19. As you know, the Pre-Hearing Officer ruled that AT&T Florida was required to provide only "the requested information for the period of July 2005 through July 2007." AT&T has already complied with this requirement. As I stated previously, both at the Pre-Hearing Conference and in previous filings, the information for the 2005-2007 time period was extracted from a system that does not have information any earlier than 2005. Nevertheless, through a great deal of time-consuming effort (much of which was manual), we were able to extract earlier information from a different data base. Thus, the attached electronic file contains the requested information for the time frame of January 1, 2003 through December 31, 2004. You will note that there are some slight differences in the format of the information in the attachment. Again, this is because a different database was utilized, and it was not possible to produce information that matched up exactly with that which was previously produced from a different database.

This information is confidential because it includes information about specific AT&T customers. For this reason, I am transmitting it to you in a password protected file. Someone from my office will call you with the password for the file. If you have not received this call by the end of the day, please call me at your earliest convenience, and I will give you the password.

Sincerely,

J. Phillip Carver

cc: All Parties of Record