

Diamond Williams

100022-TP

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Friday, August 13, 2010 1:46 PM
To: Filings@psc.state.fl.us
Subject: 100022-TP AT&T Florida's Response to NewPhone's First Amended Answer/Counter-Claim
Importance: High
Attachments: img-813104359-0001.pdf

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B. Docket No. 100022-TP: Complaint of BellSouth Telecommunications,

Inc. d/b/a AT&T Florida Against Image Access, Inc. d/b/a New Phone

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida

on behalf of Tracy W. Hatch

D. 3 pages total (includes letter, pleading and certificate of service)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to NewPhone's First Amended Answer/Counter-Claim

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FILED NUMBER DATE

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8/13/2010



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August 13, 2010

Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Docket No. 100022-TP: Complaint of BellSouth Telecommunications, Inc. d/b/a AT&T Florida Against Image Access, Inc. d/b/a NewPhone

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to NewPhone's First Amended Answer/Counter-Claim, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Tracy W. Hatch

cc: All parties of record
Gregory R. Follensbee
Jerry D. Hendrix
E. Earl Edenfield, Jr.

CERTIFICATE OF SERVICE
Docket Nos. 100022-TP

I HEREBY CERTIFY that a true and correct copy was served via
Electronic Mail and First Class U. S. Mail this 13th day of August, 2010 to the
following:

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Tracy W. Hatch

FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of BellSouth)
Telecommunications, d/b/a AT&T)
Florida Against Image Access, Inc.)
d/b/a New Phone)
_____)

Docket No. 100022-TP

Filed: August 13, 2010


**AT&T FLORIDA'S RESPONSE TO NEWPHONE'S FIRST AMENDED
ANSWER/COUNTER-CLAIM**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") respectfully submits this Response to the First Amended Answer, Affirmative Defenses and Counter-claim of Image Access, Inc. d/b/a/ NewPhone ("NewPhone") filed on August 3, 2010.

1. AT&T Florida denies the allegations in Paragraph 2 of the Counter-Claim, as amended.

2. In all other respects, AT&T Florida reasserts and reiterates the Response to NewPhone's Answer/Counterclaim it filed in this Docket on or about April 9, 2010.

Respectfully submitted this 13th day of August, 2010.



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RECORDED NUMBER-DATE

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