J. Phillip Carver General Attorney UNICHAL

BellSouth Telecommunications, Ing. c/o Nancy H Sms Suite 400 150 So Monroe Street Tallahassee, Florida 32301 Telephone: 305 347-5558

September 25, 1996

Ms. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Betty Easley Conference Center, Rm. 110
Tallahassee, FL 32399-0850

Re: Docket No. 930330-TP and

Dear Mrs. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Deposition, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Philly, Can. (44)

J. Phillip Carver

Enclosures

cc:

All Parties of Record

R. G. Beatty A. M. Lombardo William J. Ellenberg II Charles Dennis Indiantown Telephone System Post Office Box 277 Indiantown, FL 34956

Jeff McGehee Southland Telephone Company 210 Brookwood Road Post Office Box 37 Atmore, Alabama 36504

Daniel V. Gregory Quincy Telephone Company Post Office Box 189 Quincy, FL 32351

Deborah Barratt Vice President One Call Communications, Inc. 801 Congressional Boulevard Carmel, Indiana 46032

Angela B. Green General Counsel Florida Public Telecommunications Assoc. 125 So. Gadsden St., #200 Tallahassee, FL 32302

Benjamin W. Fincher Attorney, State Regulatory Sprint Communications Company Limited Partnership 3100 Cumberland Circle Atlanta, GA 30339 C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom & Ervin
P.O. Drawer 1170
305 South Gadsden Street
Tallahassee, FL 32302
atty for Sprint

\*Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin Davidson, Rief & Bakas 117 South Gadsden Street Tallahassee, FL 32301 Attys. for FIXCA

Robin Dunson 1200 Peachtree Street, N.E. Suite 4038 Atlanta, GA 30309 Atty. for AT&T

Mark Logan Bryant, Miller & Olive 201 S. Monroe Street Suite 500 Tallahassee, FL 32301 Atty. for AT&T

J Anily Care (12)

<sup>\*</sup>Hand Delivered

# CERTIFICATE OF SERVICE Docket Nos. 930330-TP and 960658-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand

Delivery and U.S. Mail this 25 of Suptember, 1996 to:

Charles J. Beck
Office of Public Counsel
c/o The Florida Legislature
Suite 812
111 West Madison Street
Tallahassee, FL 32399-1440

\*Monica M. Barone, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Cathy Swanson
Central Telephone Company
of Florida
Post Office Box 2214
Tallahassee, FL 32316

Lee L. Willis
John P. Fons
J. Jeffrey Wahlen
Macfarlane, Ausley, Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302

Martha McMillin MCI Telecommunications Corp. Suite 700 780 Johnson Ferry Road Atlanta, GA 30342 (404) 843-6140 Richard D. Melson Hopping Boyd Green & Sams P.O. Box 6526 Tallahassee, FL 32314

Kimberly Caswell GTE Florida Incorporated P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Harriet Eudy ALLTEL Florida, Inc. Post Office Box 550 Live Oak, FL 32060

\*Tracy Hatch, Esq. AT&T 101 North Monroe St., Ste. 700 Tallahassee, FL 32301 (904) 425-6360 atty for AT&T

David B. Erwin Young, van Assenderp, Varnadoe & Benton, P.A. 225 South Adams St., Ste. 200 Post Office Box 1833 Tallahassee, FL 32302

Mr. John A. Carroll, Jr. Northeast Florida TelephoneCo. Post Office Box 485 Macclenny, FL 32063-0485

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

the con-

In re: Complaint of Florida Interexchange

Carriers Association, MCI Telecommunications Corporation, and AT&T Communications of the Southern States, Inc.,

against BellSouth Telecommunications, Inc.

Docket No. 960658-TPDocket No. 930330-TP

) Filed: September 25, 1996

### NOTICE OF DEPOSITION

To: Tracy Hatch
AT&T Communications
101 North Monroe St., Ste. 700
Tallahassee, FL 32301

Notice is hereby give that BellSouth Telecommunications, Inc. will take the depositions of the following named individuals:

Corporate Representative of AT&T of the Southern States, Inc.

The Corporate Representative shall be the person named by AT&T, pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure to provide testimony on behalf of AT&T as to the areas of inquiry set forth on Attachment "A" hereto.

At the following location and time:

October 2, 1996 1:30 PM 2540 Shumard Oak Blvd. Gunter Building, Room 362 Tallahassee, FL 32399-0850

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy H. Sims 150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5555

y. Ellenting (DE)

WILLIAM J. ELLENBERG II

NANCY B. WHITE

Suite 4300

675 W. Peachtree St., NE Atlanta, GA 30375

(404) 335-0747

DOCUMENT OF THE STATE

10276 SEP 25 5

#### ATTACHMENT "A"

Areas Of Inquiry Designated Pursuant To Rule 1.310, Fla. R. Civ. Proc.

BellSouth will inquire as to the following:

- The content of the documents attached hereto, including, but not limited to, AT&T's references to "automatically" carrying the "local toll calls" of customers.
- 2. The process by which the attached documents were developed.
- To whom correspondence like or similar to the attached documents has been sent; including, but not limited to, whether documents of this sort has been sent to subscribers of telephone service in Florida who are not currently customers of AT&T.
- 4. Whether AT&T has received complaints of slamming (or of any other impropriety relating to carrier selection) which complaint(s) relate to or involve in any manner receipt by customers of correspondence like or similar to the attached documents.
- The marketing efforts of AT&T in the State of Florida regarding "local toll calls" including, but not limited to, the practice referred to in the attached letter, whereby AT&T is "automatically" carrying local toll calls.
- AT&T's residential and business offerings for local toll calls in the State of Florida.



July 16, 1996



DCAT

Thank you for selecting Ales for your Local Toil calls. We're delighted that you've chosen to expand your Ales service.

Effective 08/04/96, AMT Local Toll service is scheduled to be available in your area. Soon you'll automatically get the same unsurpassed quality, reliability, and service on your Local Toll calls that you've come to expect from AMT.

Once again, thanks for choosing ABE Local Toll service. And, of course, if you have any questions, please don't hesitate to call us anytime at 1 800 532-9997.

Sincercly.

Mary Eller Burton Marketing Manager

ADM In-State Service

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# ... AT&T Service Agreement

Your signature on this frame authorizes AT&T to process your order and areily your local phone company of your decision to swhich to AT&T for your local soil calling service. Your local telephone company may charge you a fee to avoid your local subservice. If m, it will appear on a future telephone talk and AT&T will send you an AT&T Loug Distance Certificate to cover the charge in full.

Only one carrier may be designated for your local soil calls.

Your scienceion of AT&T will apply only to the telephone number (s) listed on the frost of this card.

:-05X

FROM CARA STATE STAFF

308 877 3027

04-02-96 02:31FH PO01 80E

P002/002



P.O. Box 628227 Orlando, Fl. 32862-8227

# Dear Valued AT&T Customer:

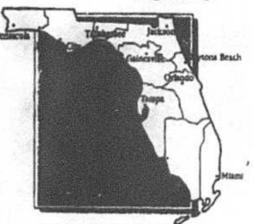
Recently, the Public Utilities Commission of Plorida approved legislation for you to choose who carries your local toll calls—calls outside your local calling area but still not long distance. Until now, these calls were automatically handled by BellSouth.

Now when you choose AT&T, you can get the same great quality and savings on your local toil calls that you already receive on your long distance. Plus, some great advantages over BellSouth. And AT&T can carry these calls automatically—just like we do your long distance.

## The billing advantage.

AT&T bills in precise 1-second increments after the first 30 seconds, so you only pay for the time you spend talking or faxing. (With BellSouth, you're billed in 6-second increments.)

# Get big advantages over BellSouth. Choose AI&T to carry your local toll calls today.



This map is divided into 10 calling areas. When making local toil calls within your area, you can now use KTRT manufacturity.

Plus, you can save even more, because AT&T Business Service gives you a 10% discount when you spend just \$25 a month on AT&T calls.

### The no-fee advantage.

Another advantage of AT&T is that we cover your fees. As you know, we credit you the nominal AT&T: Business Service \$5 monthly fee whenever you spend just \$25 a month. (With BellSouth's MINIMUM MONTHLY SETTLEMENT, you're automatically charged for two hours worth of calls. That's \$18.60 a month—no matter how few calls you make—even when you don't make any calls at all.') Plus, we also credit you the BellSouth charge to switch your local toll service to AT&T.

Why walt? Give your business the AT&T local toll call advantage. Call 1 800 222-0400 today (press 1, then 3), or simply fill out the reply card and mail it back to us.

Sincerely.

Bill Bright

Florida Marketing Manager, AT&T In-State Services

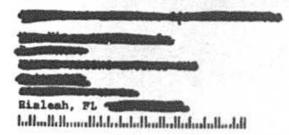
\* Revent on average business call length and optical business call missage disentation and britisouth Waltaver Option 2 cates in effect 5-1-96.

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FLBXst 1

YES, Add local toll calls to my ATAT service.

I authorize: AT&T to act as my agent to switch my local toll service to AT&T and to notify BellSouth of my decision to change to AT&T local toil service. My selection of AT&T will apply only to the Billed Telephone Numbers (BTNs) listed and written on this card and all



rimn dat is byler brenish

Working Telephone Numbers (WTNs) assigned to the BTNs. I also understand that BellSouth may charge me a fee to switch my local toll service to AT&T.

Thank you for choosing AT&T.

Mosse make any elemetions to your same, address, and phone number below.



Nativ	100			
Address				
City		Nate	ZIP	
Phone Number	-			
X				
Signature		Day		

\*\*\*\*



ally enery your alls — and save u AT&T basic rates

Now you can choose with the instant of your local phoen company to carry your local util talls.

(Local toil calls are calls to aumbers that are outside your local calling area but still not long distance.) That way you're guaranteed to automatically get the same AT&T quality and convenience for your local toil calls that you're already getting on your AT&T Long Distance calls.

Plus, by choosing AT&T to carry your local toil calls automatically, you'll be able to just pick up the phase and dist as you necessity would. And, of course, AT&T provides this local toil service with so monthly fees and no baseles.

What's more, if you encoll in ATAT True Reach® favious, you can save up to 25% on your local toil coils so well at on your other qualifying loss distinct ATAT coils to selyone in the U.S. when you spend at least \$10 a month.\* Here's all you have to do:

- Choose AT&T to every your local soil calls and you'll get the same great scrvice, quality, and reliability on your local soil calls at you already do on your AT&T Long Distance calls.
- Receil in ATRT True Reach Seriogs. With ATRT True Reach Seriogs you'll get 10% suriogs when you spend just \$10 on qualifying ATRT calls and 25% suriogs when you spend \$25, guaranteed. And you'll get these savings no matter whom you call or what time of the day or sight you call.

"So choose ATET for your local toll calls right away. There's no executing see." Toll can choose ATET for your local toll calls and sign up for ATET True Reach Savings at the same time by filling out the atached reply card or calling us at 1 800 345-0998, ext. 17153.

Thanks again for choosing AT&T. Your True Choice.<sup>6</sup> We apprecise your business.

Sincerety,

Carmina Delalma

Caronios DePalens Marketing Manager

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FROM CARA STATE STAFF 300 STT 3027

#425 () 96-52-60