COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Petition of Choice One Communications of	**)**
Massachusetts Inc., Conversent Communications	**)**
Massachusetts, LLC, CTC Communications	**)**
and Lightship Telecom, LLC For Exemption	**)**
from Price Cap On Intrastate Switched Access Rates	**)**
as Established in D.T.C. 07-9	**)**

AT&T'S RESPONSES TO ONECOMM'S FIRST SET OF INFORMATION REQUESTS

***** PUBLIC VERSION *****

In accordance with 220 C.M.R. § 1.06(6)(c)2, AT&T Communications, Inc. ("AT&T") submits the following responses to One Communication's First Set of Information Requests:

General Objections

1. AT&T objects to each Data Request to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege.

2. AT&T objects to each Data Request to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. AT&T objects to each Data Request to the extent that it is ambiguous, vague, overly broad, or contains language or undefined terms susceptible to multiple meanings.

4. AT&T objects to each Data Request to the extent that it seeks production of information that is in the public domain, for example, documents that have been filed with a government agency.

5. AT&T objects to each Data Request to the extent that it seeks production of information that is in the possession, custody, or control of One Communications.

6. AT&T objects to each Data Request to the extent that it seeks disclosure of confidential or proprietary information that is not relevant to this proceeding.

7. AT&T objects to each Data Request that seeks information not limited in scope to the time period at issue in this proceeding.

8. AT&T objects to each Data Request to the extent that it is unduly burdensome, expensive, or oppressive to respond to as presently written, particularly where a Data Request seeks information regarding "all" instances or examples.

9. AT&T objects to each Data Request to the extent that it is argumentative or calls for a legal conclusion.

10. As discovery is ongoing in this matter, AT&T reserves the right to supplement and update these responses.

Question: Please provide all the exhibits to the AT&T Panel Rebuttal testimony in the native (such as Microsoft Excel ®) form.

Response:

Exhibit D:

Exhibit E:

Exhibit G

Question: Please provide all workpapers, analyses and documents used in preparation for the AT&T Panel Rebuttal testimony in the native (such as Microsoft Excel ®) and fully unlocked and in working form.

Response: See 1-2_ATT Adj NUCA.zip enclosed.

Question: Please provide all workpapers, analyses and documents used in preparation of the AT&T Panel Exhibits in the native (such as Microsoft Excel ®) and fully unlocked and in working form.

Response: See Response to One Communications – AT&T 1-2.

Question: Regarding page 4, footnote 2 in AT&T's Panel Rebuttal testimony, please identify the page or pages within the FCC's National Broadband Plan where the FCC has stated that it is taking switched access rates to zero and that a carrier would then recover all of its access costs from its own end user.

Response: The following are relevant excerpts from the FCC's National Broadband Plan:

- The current per-minute ICC [intercarrier compensation] system was never designed to promote deployment of broadband networks. Rather, ICC was implemented before the advent of the Internet when there were separate local and long distance phone companies. Local companies incurred a traffic-sensitive cost to "switch" or connect a call from the long distance company to the carrier's customer. The per-minute rates charged to the long distance carrier were set above cost and provided an implicit subsidy for local carriers to keep residential rates low and promote universal telephone service. [footnote omitted]. ICC has not been reformed to reflect fundamental, ongoing shifts in technology and consumer behavior, and it continues to include above-cost rates. ***The current [InterCarrier Compensation] ICC system is not sustainable*** in an all-broadband Internet Protocol (IP) world where payments for the exchange of IP traffic are not based on per-minute charges, but instead are typically based on charges for the amount of bandwidth consumed per month. See page 142. [emphasis added].

- **Recommendation 8.7**: ***The FCC should adopt a framework for long-term intercarrier compensation (ICC) reform that creates a glide path to eliminate per-minute charges while providing carriers an opportunity for adequate cost recovery, and establish interim solutions to address arbitrage.*** See page 148. [emphasis added].

- ***The FCC should also encourage states to complete rebalancing of local rates to offset the impact of lost access revenues.*** Even with SLC increases and rate rebalancing, some carriers may also need support from the reformed Universal Service Fund to ensure adequate cost recovery. When calculating support levels under the new CAF, the FCC could impute residential local rates that meet an established benchmark.

> [footnote omitted] Doing so would encourage carriers and states to "rebalance" rates to move away from artificially low $8–$12 residential rates that represent old implicit subsidies to levels that are more consistent with cost. [footnote omitted]. See page 148. [emphasis added].

The full text of the Broadband Plan can be found at www.broadband.gov.

As stated above, the FCC's National Broadband Plan indicates that intercarrier compensation should converge toward zero and the first step in that process is for state commissions to set the ILECs' intrastate switched access rates to parity with interstate levels and also cap the CLECs' rates at the ILEC's rate Massachuetts is both a leader and a model in this regard, having achieved access rate interstate-intrastate parity for both ILECs and CLECs.

The import of the two FCC NBP statements is that once intrastate access rates are lowered to, say, a third of a penny, for, say, 150 intrastate access minutes of use a month, then the LEC is only going to be generating 50 cents from intrastate access. At that point a further step to a zero rate or practically zero rates is a small step. So the two reforms are intertwined and complementary.

Question: Regarding page 4, footnote 3 in AT&T's Panel Rebuttal testimony, please identify each of the "flaws that the New Jersey BPU expressly rejected its Order." Of those alleged flaws, please identify where in the NUCA filed in this proceeding each such flaw is can be found.

Response: The New Jersey BPU Order speaks for itself. Please see the New Jersey BPU Order attached to the November 1, 2010 AT&T Panel Rebuttal testimony as Exhibit A. AT&T's Panel Testimony addresses specific flaws in NUCA.

Question: Regarding page 12 of AT&T Panel Rebuttal testimony, the sentence on the bottom of the page starting with phrase "In the access charge regime,…" and ending with a reference to footnote 10: The source in footnote 10 referenced in this sentence appears to have no direct relation to the statement in the main body of the testimony. Please explain how footnote 10 supports the statement in the main body of the testimony, or correct the reference, if applicable.

Response: Footnote 10 in the AT&T Panel testimony references the FCC's 2008 NPRM, Appendix A, ¶165. That referenced paragraph discusses different concepts, one of which is the fact that ILECs assess interstate access charges on IXCs (or long distance companies) "for the recovery of ILECs' costs assigned to the interstate jurisdiction." The same is true for CLECs like OneComm.

Question: Regarding page 13 of AT&T Panel Rebuttal testimony, the sentence starting with the phrase "In fact, these relatively high switched access rates created an arbitrage opportunity…" and ending with a reference to footnote 13: Footnote 13 references a specific paragraph in the 2008 NPRM, which has no direct relation to the statement in the main body of the testimony. Please explain how the referenced paragraph from the 2008 NPRM in footnote 13 supports the statement in the main body of the testimony, or correct the reference, if applicable.

Response: The FCC's 2008 NPRM, Appendix A, ¶168, referenced in the footnote discusses how high interstate "switched access rates created opportunity for competitive access providers (CAPS) to begin offering facilities based competition" mostly to business locations. This is similar to the trend over the years where unreasonably high intrastate access charges have encouraged new entrants like OneComm to target business customers. See AT&T Panel Rebuttal Testimony at page 13.

Question: At page 22 of its Panel Rebuttal testimony, AT&T states NUCA *"is riddled with fundamental errors."* Please list each such error and demonstrate its impact on One Communications' cost estimates for intrastate switched access services in the Commonwealth of Massachusetts.

Response: The NUCA model is indisputably an average cost study, and not an incremental cost study. Accordingly, it is invalid for this case at the outset. Moreover, AT&T has already computed the effect of its adjustments in the exhibits to the Panel Testimony.

AT&T noted one fundamental error of including loop costs in a usage-based cost for carrier access rates. Of course, for practical purposes and costing purposes, the cost of the loop does not vary with usage. And as the FCC has noted, long-distance carriers are not the cost-causer of loop costs. Likewise the NUCA study improperly includes loop aggregation in its errant calculation of access costs. Loop aggregation is not an incremental cost of access for the same reasons. Together, these two errors account for **[*** BEGIN PROPRIETARY INFORMATION**

END PROPRIETARY INFORMATION *]**

AT&T identified four additional defects and calculated the effect of correcting for three of the additional defects. Once AT&T had identified, corrected, documented and quantified these threshold errors, it had corrected approximately $5/6^{th}$ of the claimed costs. Since the NUCA model is not an incremental study, and since AT&T's corrections showed that most of the costs claimed in the model were improper, it was unnecessary and would have been wasteful to "list each such error and demonstrate its impact on One Communications' cost estimates for intrastate switched access services in the Commonwealth of Massachusetts "

Verizon also described a larger number of corrections in its review. Likewise, Comcast noted a number of defects. The AT&T, Verizon, and Comcast testimony demonstrate that the NUCA study is indeed riddled with fundamental errors.

See the AT&T, Verizon, and Comcast direct testimony.

Question: At page 23 of its Panel Rebuttal testimony, AT&T states that One Communications uses **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]**. Please fully describe and demonstrate mathematically how this figure was derived and provide all supporting documents, workpapers and analyses upon which AT&T's testimony in this regard is based. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: See "Trunk Resizing.xls" in the zip file provided in response to OneComm to ATT 1-2. Also see AT&T Panel Exhibit F - Description of Adjustments.pdf

Question: At page 24 of its Panel Rebuttal testimony, the Panel asserts that One Communications' overstates its cost of capital within the NUCA model because it uses the Department-approved cost of capital for Verizon from a 1999 UNE case. Please identify all rates that the Panel asserts have recently declined in financial markets and provide all analyses developed by the Panel and all financial market research performed by the Panel to reach this conclusion.

Response: Given that interest rates are at record lows, largely driven by federal efforts to stimulate the economy, it is widely and generally known that interest rates are lower now. For example, the Federal Funds rate is currently ***zero***. Likewise, many mortgage rates are at the lowest rates of our lifetimes. There is no genuine dispute that current interest rates are at relatively very low rate levels, and it is unnecessary to conduct a special study to observe that fact.

Question: At page 24 of its Panel Rebuttal testimony, AT&T states One Communications' costs of intrastate switched access in the Commonwealth of Massachusetts cannot reasonably exceed **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]** per minute and that its composite rate is **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]** per minute. Please fully describe and demonstrate mathematically how these figures were derived and provide all supporting documents, workpapers and analyses upon which AT&T's testimony in this regard is based, including, but not limited to, those documents, workpapers and analyses that contributed to the development of AT&T Panel Exhibits D and E. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: See Response to One Communications – AT&T 1-1.

The first rate is mathematically derived by making the adjustments that AT&T addressed in the testimony, pursuant to the one-page Exhibit F detailing the changes, and Exhibit D quantifies their effects. OneComm obviously possesses the model and can readily run the model with those few changes. See also response to One Communications – AT&T 1-3 for all workpapers generated by AT&T's adjustments to the NUCA model.

The second rate is developed in Exhibit E, which is self-explanatory.

Question: At page 27 of its Panel Rebuttal testimony, footnote 45, AT&T states the following: "While customers may buy local service with no long-distance, *customers to do not by buy local serve switched long distance*." Please clarify what AT&T means in the italicized portion of this footnote. If the footnote is misstated, please provide the correct statement AT&T intended to make.

Response: The statement corrected for typographical omission should read: "While customers may buy local service with no long-distance switched access service, customers do not buy long-distance switched access without local services."

Question: At page 27 of its Panel Rebuttal testimony, AT&T states that One Communications' loop costs constitute **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]** of One Comm's cost results. Please fully describe and demonstrate mathematically how this figure was derived and provide all supporting documents, workpapers and analyses upon which AT&T's testimony in this regard is based. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: AT&T does not make the stated claim. See the testimony explaining that the costs within the aggregation module, not loop, constitute about **[*** BEGIN PROPRIETARY INFORMATION] [END PROPRIETARY INFORMATION ***]** of OneComm's cost results. AT&T does note that loop costs constitute **[*** BEGIN PROPRIETARY INFORMATION] [END PROPRIETARY INFORMATION **]** of the purported costs in the NUCA average cost study.

Question: At page 29 of its Panel Rebuttal testimony, AT&T states that *"the bulk of the switching investments are "Getting Started" costs which are incurred when end users request connection to the switch."* Please admit that AT&T indeed contends "Getting Started" costs are incurred each time an end user requests connection to the switch. If your answer is anything other than admit, please fully describe your answer and provide all documents, workpapers and/or analyses used or relied upon to support your answer. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: Denied. See Response to One Communications – AT&T 1-15 & 1-16.

Getting Started costs are non-usage sensitive costs. Getting Started costs are not incurred each time an end user makes a call attempt, as may have been implied in OneComm's question. Getting Started costs are incurred in anticipation that an end user will request local service installation, which involves connection of the end user location to OneComm's switch.

Question: Please fully describe the extent to which AT&T ascribes the phrase "Getting Started costs" to a particular switch vendor and/or a particular cost model such as Verizon's SCIS or any other model routinely utilized by incumbent local exchange carriers.

Response: AT&T's use of the phrase "Getting Started costs" is not meant to be limited to any particular switch vendor or cost model, and it is not meant to be limited to incumbent local exchange carriers. All switches, regardless of the manufacturer, have Getting Started costs. These costs include materials like ports, processors and associated software, and other items needed when end users request installation of a customer line. According to the documentation (including NUCA) provided by OneComm, CLECs have access to the same switch vendors as the ILECs, and there is no reason to speculate that the phrase "Getting Started" would only apply to the ILECs.

Question: At page 29 of its Panel Rebuttal testimony, AT&T states that *"the bulk of the switching investments are "Getting Started" costs which are incurred when end users request connection to the switch."* With regard to One Communications' *Trunk-to-Trunk Switching Module*, please identify all costs which are, or have been, categorized by AT&T as "Getting Started" costs and those which are not categorized by AT&T as "Getting Started" costs. Please describe for each such designation how AT&T determined the designation is appropriate for One Communications in Massachusetts.

Response: AT&T requested in discovery that OneComm provide documentation that would enable AT&T to determine the proportion of OneComm switching investments that are similar to "Getting Started" costs (*i.e.*, costs needed to complete an initial request for installation). However, OneComm refused to provide any meaningful answer. See One Comm response to AT&T - One Comm 2-1. Based on the AT&T Panel witnesses' experience from many years of reviewing cost study materials and information available on switch vendors websites, AT&T believes that CLECs have access to materially the same switching technologies today as the ILECs. As a result, the referenced statement would also apply to CLECs like OneComm, especially when OneComm has admitted that it currently deploys the same types of switches that comprise mostly "Getting Started" non-traffic sensitive items. See also AT&T Panel Testimony, pages 28-31, footnotes 52, 53.

Question: At page 30, footnote 52, AT&T's panel testimony cites a prior DTE Order in which the DTE required Verizon to *"assign getting started costs to the non-traffic sensitive category."* Please fully describe each cost assigned in the Verizon DTE Order as a "getting started" cost. Please also identify each switch manufacturer and model for which "getting started" costs were to be assigned as well as the name of the cost model at issue in that proceeding.

Response: See Response to One Communications – AT&T 1-16. See also AT&T Panel Exhibit G.

Question: Regarding page 30 of AT&T Panel Rebuttal testimony (stating that CLECs "have access to the same type of switching technologies as the ILECs"): What is the percent of softswitches in the count of all ILEC (end office/tandem) switches in AT&T-ILEC network nationwide?.

Response: AT&T Corp has no ILEC switches. Telecommunications switch types are readily available in the LERG, an industry resource to which OneComm has access.

Question: At page 30 of its Panel Rebuttal testimony, AT&T states that *"NUCA relies upon ADSL port counts to allocate switching costs between voice and data."* Please provide a detailed reference to the NUCA and its individual modules for each instance in which One Communications or QSI Consulting has relied upon ADSL port counts to allocate switching costs between voice and data. Please also identify within NUCA or elsewhere each instance in which data usage is included within the denominator of any per minute of use cost or calculation included within NUCA or any of its modules.

Response: See NUCA Model, Tab titled "MALC" in Network Element Database.xls.

Question: In footnote 56 of its Panel Rebuttal testimony, AT&T describes the traffic-sensitive category to include "getting stated" materials like processors and related software. Please admit or deny that "getting started" costs as described in AT&T's Panel Rebuttal testimony at footnote 56 are traffic-sensitive costs. If your answer is anything other than admit, please fully explain your answer.

Response: The referenced footnote, when corrected for a typographical omission, should read as follows: "AT&T initially requested that OneComm provide documentation that would reveal the proportion of its switching investment that could properly be attributed to the ***non***-traffic-sensitive category, *e.g.*, the "getting started" materials like processors and related software, but OneComm failed to provide any meaningful answer. *See* OneComm Response to AT&T Interrogatory 2-1 (AT&T Panel Ex. H)." The switch processor and software are not traffic-sensitive costs for the purposes of this cost study. They are getting started costs.

Question: At page 31, footnote 57, AT&T asserts that Dr. Ankum has testified that end office switching costs are 100% or almost 100% traffic sensitive. However, the question and answer that this footnote supports asserts that Dr. Ankum has testified that switching costs are non-traffic sensitive. Please clarify what position AT&T is attributing to Dr. Ankum on this issue.

Response: The referenced footnote, when corrected for a typographical omission, should read as follows; "Dr. Ankum had repeatedly testified, in several states, that he views end office switching costs as either 100% or almost 100% ***non-***traffic-sensitive and argued that state commissions should set rates based on his position – which is the polar opposite of the position that he and OneComm take here."

The following decisions discuss Dr. Ankum's testimony in just some of those cases. *See, e.g., Re Ameritech Indiana*, 2002 WL 1009587, at *27 (Ind. Util. Reg. Comm'n, Cause No. 40611-S1,Mar. 28, 2002); *Illinois Commerce Commission, On its own Motion, v. Illinois Bell Tel. Co.*, 2002 WL 32702271, at ¶¶ 6, 16 (Ill. Commerce Comm'n, Docket No. 00-0700, 2002); *Re Verizon New England*, 2002 WL 31928522, at *151 (Mass. D.T.E. 01-20, Aug. 23, 2002);*Re SBC Michigan*, 2004 WL 2208481 (Mich. Pub. Serv. Comm'n, Case No. U-13531, Sept. 21, 2004); *Re AT&T Comms. of California, Inc.*, 2004 WL 2327932, *116-*118 (Cal. Pub. Utils. Comm'n, D.04-09-063, Sept. 23, 2004).

In the proceedings that we cite in the footnote, Dr. Ankum testified that switching costs are 100% or almost 100% non-traffic sensitive. In this docket, Dr. Ankum argues the complete opposite, and supports the NUCA study which treats all network costs, including switching investments, as 100% traffic-sensitive and produces only usage-based costs and rates and nothing else. Dr. Ankum's statements are inconsistent.

Question: Please identify and provide all documents, workpapers and analyses performed, reviewed or consulted when AT&T witnesses Nurse and Oyefusi determined that including *"20% of the switching investment in the calculation of "traffic-sensitive" switched access costs"* accurately reflects One Communications' costs – or any carrier's costs for that matter – other than Verizon for whom that figure was determined based on a prior proceeding. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: See Response to One Communications – AT&T 1-16. See also AT&T Panel Exhibit G.

Question: At footnote 60 of its Panel Rebuttal testimony, AT&T estimates that the "per port cost" is between **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]**. Please separately describe the manner in which those figures were calculated and provide all supporting documents, workpapers and analyses upon which AT&T's testimony in this regard is based and which was considered in the development of footnote 60. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: See Non Traffic Sensitive Port Costs.xlsx

Question: Please provide a working electronic copy of AT&T Panel Exhibit G. Please fully describe the manner in which the "Non-Traffic Sensitive" costs were derived and identify all costs included therein. Please fully describe the manner in which "Getting Started" and "Non-Getting Started" costs within the "Traffic Sensitive" portion of the matrix proposed by Verizon were derived and identify all costs included therein.

Response: See Response to One Communications – AT&T 1-1.

Question: At page 34 of its Panel Rebuttal testimony, AT&T states that One Communications claims **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]** would traverse its switches on a per DS0 basis. Please admit that the figure cited herein was derived by AT&T and that One Communications made no such claim. To the extent your answer is anything other than an unqualified "admit," produce a copy of any and all documents in which One Communications made the claim attributed to the company in AT&T's testimony and specifically describe how each document supports AT&T's answer to this question.

Response: Denied. See Trunk Resizing.xlsx. The referenced figure was the result of a simple mathematical derivation that relied on OneComm actual data. To the extent OneComm claims that the source data are correct and represent OneComm's forward looking data to be used in a TSLRIC study, AT&T ascribes any figure derived with OneComm data as a claim by OneComm.

Question: At page 34 of its Panel Rebuttal testimony, AT&T alleges One Communication's network can simply be re-sized by a **[*** BEGIN PROPRIETARY INFORMATION END PROPRIETARY INFORMATION ***]** factor to correct the overbuild error implicit in the study. Please provide all reports, documents, workpapers and analyses used by AT&T to: a) determine which trunk ports would be taken out of service; b) which costs would be avoided as a result of trunk ports being taken out of service; and, c) the resulting "grade of service" for each remaining trunk port (i.e. the percent of calls which would be blocked during the busy hour) following the decommissioning of such trunk ports. Please also indicate the "grade of service" to which AT&T's network is designed.

Response: This question appears to be speculating that there would be a traffic blockade during the busy hour as a result of AT&T's adjustment. AT&T has simply stated the fact that, after doing a simple arithmetic with OneComm data the result translates to having too few minutes per DS0 trunk per month compared to the FCC proxy of 9000 minutes, which means the number of trunks assumed in OneComm's cost study is excessive.

The FCC has stated years ago, while relying on inputs from carriers in the industry, that an efficient forward looking network will have capacity of 9000 minutes per DS0, and there was no concern expressed either by the FCC or the industry that any blocking or poor service quality would occur as a result.

OneComm has not provided a busy hour study or any other demand study to support its speculation that busy hour blocking would occur if the modeled average number of minutes per DS0 trunk per month was greater than the **[*** BEGIN PROPRIETARY INFORMATION] [END PROPRIETARY INFORMATION ***]** minutes currently assumed in the OneComm study.

In response to discovery to provide traffic engineering documentation about its Busy Hour guidelines, OneComm stated that it "seeks to maintain a P.01 Grade of Service for the busiest hour of the month." See OneComm Response to AT&T 1-51. This is not an unusual industry objective, which denotes that an efficient carrier would design its network to meet a standard of one call in a hundred (i.e., one divided by 100 or ".01") potentially being blocked. But this does not say anything about OneComm's *actual* Busy Hour load and how its *actual* traffic meets or exceeds this standard.

To further test the reasonableness of assuming the FCC proxy of 9000 minutes, we estimate the equivalent centum call seconds (CCS), *i.e.*, one hundred call seconds, that would correspond to OneComm's actual trunk usage and compare to both the

36 CCS available within a busy hour and the FCC's proxy of 27.5 CCS used in the synthesis model. In contrast, our calculation yields **[*** BEGIN PROPRIETARY INFORMATION]**

[* END PROPRIETARY INFORMATION]** As a result, AT&T does not expect its revision to cause any concern for traffic blocking. See attached excel worksheet for details of AT&T's calculations.

Question: Regarding AT&T Panel Exhibit F: Please provide a fully working electronic copy of the AT&T- restated NUCA, worksheet "Trunk Resizing.xls" and any additional AT&T worksheets used to restate the NUCA as discussed in this exhibit.

Response: See AT&T Response to One Communications – AT&T 1-2.

Question: To the extent not already provided in response to prior questions, please provide all documents, workpapers and analyses referred to, relied upon, discussed in and/or utilized in the preparation of AT&T Panel Exhibit F. Please ensure all such documents, workpapers and analyses are provided in their native format (e.g., Microsoft Excel®), fully unlocked and in working form.

Response: See all documents, workpapers, and analyses provided in the responses above.