

**Illinois Commerce Commission
Docket No. 08-0569
Attorney General's Data Request 1.12**

Request:

Please state the increase in revenue (both in dollars and percentage terms) AT&T Illinois has received from DSL lines since 2001 in the Greater Illinois LATAs.

Response:

AT&T Illinois objects to this question on the grounds that it is not reasonably calculated to lead to the discovery of relevant evidence. Notwithstanding and without waiving this objection, AT&T Illinois states that it does not provide DSL service to residential customers. However, AT&T Illinois does receive revenue from CLECs and affiliates who line share AT&T Illinois facilities or use AT&T Illinois facilities for the purposes of providing DSL service. The amount of such revenues received with respect to DSL service is available only on a state-wide basis and only for years after 2005. In the confidential table below, AT&T Illinois provides statewide revenue information for the years 2006, 2007 and through the month of October 2008.

*****BEGIN CONFIDENTIAL AND PROPRIETARY**

END CONFIDENTIAL AND PROPRIETARY***

Witness Responsible: W. Karl Wardin

**Illinois Commerce Commission
Docket No. 08-0569
Attorney General's Data Request 1.26**

Request:

In AT&T Illinois Ex. 1.0, pages 28-32, Mr. Wardin refers to various CLECs. Please state where on Sch. WKW-8 the lines served by (a) Mediacom, (b) Verizon, (c) US Sonnet LLC, (d) matrix Telecom, and (e) Vonage are shown.

Response:

- (a) As Mr. Wardin discusses in his direct testimony at lines 975-980, Mediacom relies in part on Sprint to provide residential service to its customers and in particular receives its numbering resources from Sprint. **BEGIN CONFIDENTIAL**

END

CONFIDENTIAL

- (b) Verizon has been combined with MCI and is listed as "MCI (Verizon)". **BEGIN CONFIDENTIAL**

END CONFIDENTIAL

- (c) US Sonnet LLC – provides residential service to its customers through its subsidiary, Lightspeed Telecom. **BEGIN CONFIDENTIAL**

END CONFIDENTIAL

- (d) As Mr. Wardin's discusses in his direct testimony at lines 658 to 664, Matrix Telecom acquired Trinsic Inc. **BEGIN CONFIDENTIAL**

END

CONFIDENTIAL

- (e) As Mr. Wardin discusses in his direct testimony at lines 973-975 Vonage uses Level 3 to provide its backbone and numbering resources. **BEGIN CONFIDENTIAL**

END CONFIDENTIAL

Witness Responsible: W. Karl Wardin

**Illinois Commerce Commission
Docket No. 08-0569
Attorney General's Data Request 3.1**

Request:

Please provide the following schedules in an electronic spreadsheet with the formulas in tact, or in their native format for six month periods starting January 1, 2006:

- a. AT&T Illinois Ex. 1.0, Sch. WKW-5
- b. AT&T Illinois Ex. 1.0, Sch. WKW-8

Response:

AT&T Illinois objects to this request on the grounds that it is overbroad, unduly burdensome and calls for the production of documents and information that are not available in the form requested. Notwithstanding and without waiving these objections, AT&T Illinois provides the attached confidential spreadsheets in the form of the referenced Schedules WKW-5 and WKW-8 with information as of December 31, 2007. The information necessary to prepare these schedules was available because it had been previously developed and used to perform the analysis supporting the Verified Statement of W. Karl Wardin filed in support of the reclassification tariff filing made on August 1, 2008. The information necessary to provide similar spreadsheets for time periods prior to December 31, 2007 is not readily available. It would take special studies involving the expenditure of significant amounts of time and effort to develop the data necessary create such schedules in addition to the time and effort to create the schedules themselves.

AT&T Illinois further states that in the course of preparing its response to this request, Mr. Wardin discovered that an error exists in the information regarding the number of CLEC lines for the Rockford LATA as of June 30, 2008, as shown in Schedule WKW-5 as it was filed on October 20, 2008. Attached to this response is WKW-5 (Revised), which reflects revisions necessary to correct this error. All of the revisions to Schedule WKW-5 are in the lines for the Rockford exchange and Rockford LATA at the top of the second page of that schedule. There are no other revisions to that Schedule.

In addition, Mr. Wardin discovered that the "Grand Total" number of lines for one of the CLECs listed on page 1 of Schedule WKW-8, ***BEGIN CONFIDENTIAL AND PROPRIETARY END CONFIDENTIAL AND PROPRIETARY was inadvertently omitted. Attached to this response is Schedule WKW-8 (Revised), which has been corrected to include that number on page 1. There are no other corrections to that Schedule.

AT&T Illinois will substitute Schedules WKW-5 (Revised) and WKW-8 (Revised) for the original versions of those schedules for inclusion in the record at the hearing in this proceeding.

Witness Responsible: W. Karl Wardin

ATT Illinois Response to
AG Data Request 3.1- Dec 2007

ICC Docket 08-0659
AG DR 3.1 a
AG Schedule WKW-5
November 20, 2008

ATT Illinois Response to
AG Data Request 3.1- Dec 2007

ICC Docket 08-0659
AG DR 3.1 a
AG Schedule WKW-5
November 20, 2008

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569

AG DR 3.1 b

AG Schedule WKW-8

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569
AG DR 3.1 b
AG Schedule WKW-8
November 20, 2008

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569
AG DR 3.1 b
AG Schedule WKW-8

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569

AG DR 3.1 b

AG Schedule WKW-8

3

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569

AG DR 3.1 b

AG Schedule WKW-8

8

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569

AG DR 3.1 b

AG Schedule WKW-8

ATT ILLINOIS RESPONSE TO
AG DATA REQUEST 3.1 - Dec 2007

ICC Docket No. 08-0569

AG DR 3.1 b

AG Schedule WKW-8

**Illinois Commerce Commission
Docket No. 08-0569
Attorney General's Data Request 7.9**

Request:

As a follow-up to AG DR 1.14, please state the percentage of customers per exchange in the Greater Illinois LATAs for whom DSL service is available from AT&T Illinois or any of its affiliates, parents or related companies.

Response: AT&T Illinois objects to this question on the grounds that the requested information for DSL service is not reasonably designed to lead to the discovery of relevant evidence. DSL service, which is provided by ATTIS, an affiliate of AT&T Illinois, is not at issue in this proceeding and ATTIS and DSL service is not subject to the Illinois Commerce Commission's jurisdiction. Notwithstanding and without waiving these objections, AT&T Illinois states the percentage of AT&T Illinois customers located in the Greater Illinois LATAs to whom DSL service is available from an ATTIS is
*****BEGIN CONFIDENTIAL END CONFIDENTIAL***.**

Witness Responsible: W. Karl Wardin

**Illinois Commerce Commission
Docket No. 08-0569
Attorney General's Data Request 7.12**

Request:

Please state whether the following cable companies identified on Schedule WKW-11 to AT&T Illinois Ex. 1.0 are listed in Schedule WKW-8 under the names shown on WKW-11? If not, under what names are their lines listed in Schedule WKW-8?

Comcast Corporation
HLM Cable Corp.
Mediacom LLC
Reynolds Cable, Inc
Cass Cable IT Inc
Heartland Cable Inc
Mid Century Telephone Coop
Nova Cablevision Inc
Tel-Star Cablevision
Allegiance Communications
Park TV and Electronics Inc
Rapid Cable
Sudden Link Comm
Becks Cable Systems
Charter Communications
Clearvision Cable Sys Inc
Longview Comm
Madison Communications Inc
New Wave Communications
US Sonet

Response:

For those cable companies that are also providing voice service to their customers, Mr. Wardin is not aware of all of the arrangements that cable companies have made to obtain numbering resources and with whom they are partnering. However, Mr. Wardin is aware of the following cable company arrangements, as listed below. The left hand column lists the cable companies as they appear in schedule WKW-11. The right hand column lists the names of the company or companies under whose name the E9-1-1 listings of the companies listed in the left hand column appear in Schedule WKW-8.

****** BEGIN CONFIDENTIAL AND PROPRIETARY**

--	--	--

END CONFIDENTIAL AND PROPRIETARY****

Witness Responsible: W. Karl Wardin