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March 7, 2011

Ms. Elizabeth Rolando
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Re: Docket No. 11-0083

Dear Ms. Rolando:

Enclosed for filing is AT&T Illinois' Cross Examination Exhibit 6, both Public and Confidential versions. Please call me with any questions.

Sincerely,

/s/Karl B. Anderson

Karl B. Anderson
Attorney for AT&T Wisconsin

KBA/ajb
Enclosures
Cc: Service List

Illinois Commerce Commission
Docket No. 11-0083
Staff's Data Request No. JZ 1.13

Request: In his Direct Testimony, at pages 32 and 33, Mr. McPhee refers to tariffed rates and supporting cost studies filed by AT&T in response to a Commission directive in Docket 96-0486/96-0569 (Consolidated). Please provide a copy of the transit rates and supporting cost studies referenced by Mr. McPhee.

Response: AT&T Illinois filed tariff sheets containing rates (including transit rates) and supporting TELRIC cost studies in compliance with the directives of the Order in Docket 96-0486/96-0569 (Consolidated) on April 3, 1998. A copy of the April 3, 1998 transmittal letter and the accompanying tariff sheet containing the transit rates is attached. As discussed in Mr. McPhee's testimony, in accordance with the Commission's final order in Docket 98-0396, on January 18, 2002, AT&T Illinois filed an amendment to its transit tariff to reduce the Tandem Transport Facility rate. A copy of that tariff filing is attached to Mr. McPhee's testimony as Schedule JSM-3.

AT&T Illinois objects to the request for production of the cost studies submitted pursuant to the directive in Docket 96-0486/96-0569 (Consolidated) on the grounds that such request is not reasonably designed to lead to the discovery of relevant evidence. This is not a cost docket. As the Commission expressly held in an order issued subsequent to the order in Docket 96-0486/96-0569, the rate for transit service "is not required to be cost-based under either federal or state law". SBC Illinois/MCI Arbitration, Docket No. 04-0469, Arbitration Decision, p. 123 (Nov. 30, 2004). Accordingly, transit cost studies are not relevant to this proceeding. Furthermore, as discussed in response to Staff Data Request JZ 1.12, the cost studies submitted pursuant to the directive in Docket 96-0486/96-0569(Consolidated) rates were fully reviewed by Staff and the Commission in Docket 98-0386, the docket in which the currently effective tariffed transit rates were approved.

Notwithstanding and without waiving these objections, and despite the fact that Staff, as an active participant in Docket 98-0396, should already have access to the cost studies presented in that case, AT&T Illinois has attached the supporting TELRIC cost study for transit service, which was sponsored as an exhibit by AT&T Illinois witness Ruth Ann Cartee in the TELRIC Compliance Proceeding, Docket 98-0396. This attachment is marked CONFIDENTIAL. Also attached is an excerpt from an exhibit sponsored by Ms Cartee in that docket which shows the application of shared and common cost factors to TELRIC costs to arrive at the transit rates filed on April 3, 1998. This attachment is also marked CONFIDENTIAL.

Staff first DR JZ 1.13 Attachment 3

UNE	TYPE	RATE ZONE A				RATE ZONE B				RATE ZONE C				NONRECURRING CHARGE				
		TELRIC	SHARED COSTS	COMMON COSTS	TOTAL COSTS	TELRIC	SHARED COSTS	COMMON COSTS	TOTAL COSTS	TELRIC	SHARED COSTS	COMMON COSTS	TOTAL COSTS	TELRIC	SHARED COSTS	COMMON COSTS	TOTAL COSTS	
Transiting	Tandem Switching per min.				0.004836													
	Tandem Transport Term/min.				0.000189													
	Tandem Transport Facility/min.				0.000093													