

**BEFORE
THE ILLINOIS COMMERCE COMMISSION**

Z-TEL COMMUNICATIONS, INC.)	
)	
<i>Complainant,</i>)	
)	
vs.)	Docket No.
)	
ILLINOIS BELL TELEPHONE COMPANY,)	
d/b/a AMERITECH ILLINOIS,)	
)	
<i>Respondent.</i>)	

**Z-TEL COMMUNICATIONS, INC. FIRST SET OF
DISCOVERY REQUESTS TO AMERITECH**

Z-Tel Communications, Inc. (“Z-Tel”), by its attorneys O’Keefe, Ashenden, Lyons and Ward and pursuant to Section 13-515 of the Illinois Public Utilities Act, and Section 200.335 of the Illinois Administrative Code, 83 Ill.Adm.Code Sec. 200.335, requests that Illinois Bell Telephone Company respond to the following Interrogatories and Request for Production of Documents. Ameritech shall respond to this discovery request on or before March 7, 2002, by producing verified answers to Interrogatories, and by producing for inspection and copying, responsive documents at the offices of O’Keefe, Ashenden, Lyons and Ward, 30 North LaSalle Street, Suite 4100, Chicago, Illinois.

Definitions

A. Each request pertains to documents, physical objects, and computer recorded information in your knowledge, possession, custody, or control, or in the knowledge, possession, custody, or control of your agents or representatives. Each request is also a continuing request for information and documents, which come into your control during the time in which this proceeding is pending.

B. With respect to any document responsive hereto which has been destroyed, lost, or is no longer in your possession or subject to your control, you shall submit a statement setting forth as to each, a description of the item, its disposition, the date of disposition, and the names of all those with knowledge thereof.

C. The words "document", "memoranda", "work papers", "notes", "correspondence", "item", and "record", include any physical object, written, printed, typed, recorded or graphic, however produced or reproduced, whether sent, received or neither, including originals, copies and drafts, and including but not limited to: correspondence, telecopier correspondence, messages, reports and recordings of telephone or other conversations and of interviews and conferences, memoranda, notes, opinions, records, balance sheets, income statements, monthly statements, book entries, account letters, ledgers, journals, books or records of accounts, summaries of accounts, purchase or sales orders, invoices, vouchers, bills, receipts, checks stubs, cancelled checks, drafts, leases, contracts, offers, desk calendars, appointment books, diaries, expense reports, summaries, transcripts, minutes, reports, affidavits, statements, questionnaires, answers to questionnaires, plans, specifications, lab books and notations, data notations, workpapers, confirmations, formula, studies, forecasts, projections, analyses, evaluations, statistical records, tabulations, calculations, charts, graphs, surveys, renderings, diagrams, photographs, recordings, films, video recordings, microfilms, papers, books, periodicals, pamphlets, newspaper articles or clippings, publications, schedules, lists, indexes, all other records or information kept by electronic, photographic, mechanical or other means, and any item similar to the foregoing, however denominated, whether currently in existence or already destroyed.

D. As used herein, the words “Ameritech” or “Company” refer to Illinois Bell Telephone Company d/b/a Ameritech Illinois, and any predecessor, successor, or affiliated corporations, its present and former directors, officers, agents, representatives, employees, attorneys, and all other present or former persons, corporations, companies, partnerships, or organizations acting or purporting to act on behalf of Ameritech, including but not limited to Ameritech Corporation and its operating subsidiaries.

E. Ameritech shall produce original copies and drafts of each item requested, as well as copies that bear a mark or notation not contained on the original.

F. With respect to any responsive document to which you assert a claim of privilege, you shall submit a list identifying each document. Identification shall include the (1) date of the document, (2) the names, addresses and capacity of those who have signed the document, (3) the names, addresses and capacity of those who participated in its preparation, (4) the addressee or addressees, (5) the person or persons by whom it was received, (6) the general subject matter thereof, (7) the present or last known location and custodian of the original (or, if that is unavailable, the most legible copy or duplicate thereof), (8) the names and addresses of those who have received a copy of the document, and (9) the basis for your claim of privilege.

G. The obligation of Ameritech to produce documents is ongoing. Accordingly, Ameritech shall promptly provide additional documents when further documents responsive to this document request are produced or discovered.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

1. All documents that describe or relate to the process by which Ameritech identifies when an Ameritech customer switches to an alternative local exchange carrier, including but not limited to Z-Tel.
2. All documents that describe or relate to the process by which Ameritech identifies and/or notifies Z-Tel when a Z-Tel Customer switches to an alternative local exchange carrier.
3. All training manuals and publications that are used to train Ameritech personnel on how to process disconnect orders relating to Z-Tel customers.
4. Copies of all system flow charts that describe how customer disconnect records are tracked and reported within and among Ameritech's databases.
5. All lists and indices of programs that are involved in the processing of customer disconnect orders for Z-Tel customers.
6. For each program file involved in Ameritech's processing of customer disconnect orders for Z-Tel customers, all programmer documentation for the current program versions, and each prior version dating back to January, 1999, including but not limited to reports of problems and change order request.
7. All documentation relating to program testing and associated quality control activities for the period from January 1999 to the present on Ameritech's Line Loss Notification processes for Z-Tel.
8. The names of the programmer, tester, and requesting end user for each version of each program file produced in response to the above items.

9. Documentation created by the departments or individuals requesting or setting forth the requirements of the program files for Ameritech's Line Loss Notification Process for customers that disconnect from Z-Tel.

10. All documents from January 2001 to the present that describe or relate to Ameritech's efforts to improve Line Loss Notification to Z-Tel.

11. All documents between and among the following individuals relating to Ameritech's Line Loss Notification: Barbara Rogers, Howard White, Tina Ashley, Sharmaine Summerville, Ernestine Ward, Denise Hardaway, John Stankey, David Kerr, Linda Steward, Ronene Robinson, Elsa Herrera-Wiegers, Mary Pat Regan, Kathy Wilkinson and Thomas Harvey.

12. All documents relating to Ameritech's mailing Winback marketing material for customers that switch from Ameritech to Z-Tel for local exchange services.

13. Provide copies of all mailing and telemarketing lists used to communicate Ameritech Winback offers to Z-Tel customers. Indicate the data source used to identify to whom the Winback offers would be directed or offered.

14. All documents that describe or relate to the process by which Ameritech notifies its retail operations or its retail marketing operations when an Ameritech Customer switches to an alternative local exchange carrier.

15. All training manuals and publications that are used to train Ameritech personnel on how to process disconnect orders relating Ameritech customers.

16. Copies of all system flow charts that describe how customer disconnect records are tracked and reported within and among Ameritech's databases for Ameritech disconnected customers.

17. All lists and indices of programs that are involved in the processing of customer disconnect orders for Ameritech customers.

18. For each program file involved in Ameritech's processing of customer disconnect orders for Ameritech customers, all programmer documentation for the current program versions, and each prior version dating back to January, 1999, including but not limited to reports of problems and change order request.

19. All documentation relating to program testing and associated quality control activities for the period from January 1999 to the present on Ameritech's Line Loss Notification processes for Ameritech disconnected customers.

20. The names of the programmer, tester, and requesting end user for each version of each program file produced in response to the above items.

21. Documentation created by the departments or individuals requesting or setting forth the requirements of the program files for Ameritech's Line Loss Notification Process for Ameritech disconnected customers.

22. Copies of all Line Loss Notification reports sent to Z-Tel since January 2001.

23. Copies of all invoices, bill or statements delivered to Ameritech that relate to any customers disconnected from Z-Tel's services that are reported inaccurately, or not reported, on Ameritech's Line Loss Notification reports.

24. All documents delivered to Customer Service Representatives or Channel Sales representatives relating to Winback offers in Illinois.

25. Provide copies of all documents that describe the economic or financial effect or consequence of Ameritech's Winback offering, including any studies relating to whether Ameritech's Winback offers do or do not pass imputation.

26. Provide copies of all documents relating to the business and consumer customer retention groups.

INTERROGATORIES

1. Identify all persons that participated in the preparation of any response to Z-Tel's requests for the production of documents or these interrogatories.

2. Identify all Z-Tel customers that were sent promotional or marketing material after a customer migrated from Ameritech to Z-Tel. Identify the date that the customers disconnected from Ameritech and the date that the marketing material was mailed. Also identify whether those customers switched back to Ameritech, and whether they were offered any promotional or Winback discount.

3. Identify all Z-Tel customers that were contacted in any way soliciting those customers to switch from Z-Tel to Ameritech. Identify the date that the customers disconnected from Ameritech, the date that the customer was contacted, and the method by which the customer was contacted. Also identify whether those customers switched back to Ameritech, and whether they were offered any promotional or Winback discount.

4. State the criteria if any (i.e. customer credit class) that Ameritech determines it will or will not solicit customers that have switched to an alternative local exchange carrier.

5. Describe with particularity the process by which Ameritech identifies for its retail operations or its retail marketing operations when an Ameritech customer

switches to an alternative local exchange carrier, including the identification of all information that is provided, as well as when that information is provided.

6. Describe with particularity the process by which Ameritech identifies for Z-Tel when a Z-Tel customer switches to an alternative local exchange carrier, including the identification of all information that is provided, as well as when that information is provided.

Respectfully submitted,

Z-TEL COMMUNICATIONS, INC.



By: One of its Attorneys.

Thomas Koutsky
Vice President, Law and Public Policy
Z-Tel Communications, Inc.
1200 19th St., N.W., Suite 500
Washington, DC 20036
tkoutsky@z-tel.com
tel 202.955.9652
fax 208.361.1673

Henry T. Kelly
Joseph E. Donovan
O'Keefe, Ashenden, Lyons and Ward
30 N. LaSalle St., Suite 4100
Chicago, Illinois 60602
312-621-0400
312-621-0297 (fax.)
hkelly@oalw.com
jedonovan@oalw.com