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December 16, 2002

**VIA E-MAIL AND FEDERAL EXPRESS**

Joseph G. Dicks  
Law Office of Joseph G. Dicks, APC  
750 B Street, Suite 2720  
San Diego, California 92101

Re: North County vs. Verizon, ICC Docket No. 02-0147

Dear Mr. Dicks:

Pursuant to Section 200.350 of the Illinois Commerce Commission's Rules of Practice, 83 Ill. Admin. Code §200.350, this letter constitutes Verizon's reasonable attempt to resolve differences resulting from North County's responses to Verizon's third set of discovery in the above-referenced matter.

**I. Proprietary Information/Documentation**

North County did not provide answers to several requests based on claims that the requested information is proprietary. On December 10, 2002, I telephoned your office and left a voice message whereby I informed you of Verizon's consent to enter into an agreement for the exchange and protection of proprietary information during the course of this litigation. I further sent on the same date via e-mail a copy of a standard confidentiality agreement entered into by Verizon in Illinois Commerce Commission proceedings for your review. You have failed to respond in any fashion to either my voice mail or e-mail communications.

An additional copy of the standard agreement utilized by Verizon for these purposes in Illinois Commerce Commission proceedings is attached hereto for your convenience. Please execute and return a copy of this agreement along with all information/documentation previously withheld by North County based on North County's claim that such information/documentation should be accorded proprietary treatment by the close of business Thursday, **December 19, 2002**. Upon receipt of your executed copy of the agreement, Verizon will also execute of a copy of the agreement. Any objection to entering into this standard agreement should be made to Verizon by the close of business **Wednesday, December 18, 2002**, to enable the parties to negotiate a mutually acceptable agreement.

**II. Privilege Log**

North County states in response to VZ-NCC 3.24 that it is withholding documents based on a claim of privilege. As provided in the instructions to Verizon's third set of discovery, please provide a log setting forth the date of the document, the author(s), the recipient(s), a

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summary of the document generally describing its contents, and the basis for the privilege asserted. Please provide this information by the close of business Thursday, **December 19, 2002**.

**III. Duplicated Questions/Answers**

North County misstates VZ-NCC 3.25 and provides an identical response to VZ-NCC 3.24. Please provide a response to VZ-NCC 3.25. If North County withholds any documentation on the claim of privilege, please provide a privilege log as set forth above and in the instructions to Verizon's third set of discovery. Please provide this response and/or privilege log by the close of business Thursday, **December 19, 2002**.

**IV. Identification of Responsible Persons**

Pursuant to the instructions to Verizon's discovery requests, please identify each person who provided information used in answering each discovery request. Such information is to include the full name, present business address, occupational title, employer and organization for each person, and indicate the information provided by each. Please provide this information for all responses to discovery requests for each of Verizon's **first, second and third** sets of discovery to North County. Please provide this information by the close of business Thursday, **December 19, 2002**.

Please do not hesitate to call should you have any questions in regard to the above.

Sincerely,

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By:

Sarah A. Naumer

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