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September 19, 2007

Reneé J. Jenkins, Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 13th Floor
Columbus, Ohio 43215-3793

Re: Revolution Communications, Ltd. v. AT&T Ohio
Case No. 06-427-TP-CSS

Dear Ms. Jenkins:

Pursuant to the parties' stipulation, filed on September 14, 2007 in the referenced case, AT&T Ohio encloses for filing Revolution's responses to AT&T Ohio's first set of discovery.

Also enclosed is an exhibit list identifying AT&T Ohio's exhibits that are part of the record in this case pursuant to the parties' stipulation.

A certificate of service is included with this filing. Thank you for your courtesy and assistance in this matter. Please contact me if you have any questions.

Very truly yours,

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician Jo Date Processed 9-19-07

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of
Revolution Communications, Ltd.
Against AT&T Ohio for Unjust and
Unreasonable Billings and Other
Violations Under the Parties'
Interconnection Agreement.

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Case No. 06-427-TP-CSS

**REVOLUTION'S RESPONSES TO RESPONDENT AT&T OHIO'S FIRST SET OF
INTERROGATORIES, REQUEST FOR ADMISSION, AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

COMES NOW Revolution Communications, Ltd., and serves these answers to Respondent AT&T Ohio's First Set of Interrogatories, Request for Admission, and Request for Production of Documents as shown on the following pages.

Respectfully submitted,

By: 

Christopher Malish
Texas Bar No. 00791164
Foster Malish Blair & Cowan, L.L.P.
1403 West Sixth Street
Austin, Texas 78703
(512) 476-8591
(512) 477-8657/fax

Mary W. Christensen
Christensen Christensen & DeVillers
401 North Front Street, Suite 350
Columbus, Ohio 43215
(614) 221-1832

ATTORNEYS FOR REVOLUTION

CERTIFICATE OF SERVICE

I hereby certify that I have this the 9 day of August, 2006, served a true and correct copy of the foregoing via electronic mail and via certified mail return receipt requested to the following:

Jon F. Kelly
Mary Ryan Fenlon
AT&T Ohio
150 E. Gay Street
Room 4-A
Columbus, OH 43215
E-mail: jk2961@att.com



Christopher Malish

INTERROGATORY NO. 1: Please state the names and addresses of each person employed by you having personal knowledge of any of the facts or circumstances alleged in the Complaint filed by you with the Public Utilities Commission of Ohio on or about March 15, 2006.

Response: Peni Barfield

Sharon Litke

Suguna Patibandla

Kit Morris

Jennifer Hall

Patricia Harrison

7900 John Carpenter Freeway
Dallas, TX 75247
(214) 630-6700

INTERROGATORY NO. 2: Please state whether, during all relevant times covered by your complaint, you received a Daily Usage Feed (or DUF file) from Respondent and describe how that information was used by you.

Response: Yes. Used to prepare CABS, perform various analytics and generate carrier access and validate various select billings.

INTERROGATORY NO. 3: Please describe the internal process that Revolution uses to reconcile usage billed by AT&T.

Response: Generally, the only reconciliation that was done was to compare average per line current billings to average per line prior billings to look for unexpected discrepancies. Revolution used internal resources and staff to do this kind of work.

INTERROGATORY NO. 4: Please state whether any individual employed or contracted by Revolution recognized prior to June 2004 that Daily Usage Feeds (or DUF files) did not match billing records.

Response: No.

INTERROGATORY NO. 5: If the answer to Interrogatory No. 4 is yes, please provide the name, business address, and telephone number of the individual who discovered the conflict.

Response: Not applicable.

INTERROGATORY NO. 6: Please describe the internal process that Revolution used to identify disputed charges for UNE-P charges billed by AT&T.

Response: Objection. Overly broad and ambiguous. Assuming this interrogatory refers to how CCI charges were identified that should have cost \$.74, Revolution checked to see if the item met the following criteria: 1. Charge was for \$33.88; 2. "No dispatch" was indicated on bill; and 3., order had same day service order date and completion date.

INTERROGATORY NO. 7: Please describe the action taken by Revolution when UNE-P charge claims were denied by AT&T.

Response: Objection. Overly broad and ambiguous. Assuming again that this interrogatory refers to CCI charges, Revolution would continue to show these as disputes on summaries sent to AT&T; and would sometimes dispute them again; disputes not decided in Revolution's favor would be resolved by forwarding Revolution's account manager.

INTERROGATORY NO. 8: Please identify each individual you will call as a witness in this case and provide their name, business address, and telephone number.

Response: At this point, Peni Barfield and Sharon Litke, 7900 John Carpenter Freeway Dallas, TX 75247, (214) 630-6700.

Buddy Howard may be called as a witness. He can be reached care of Foster, Malish, Blair and Cowan.

Possibly others at AT&T; this will be better known after discovery is complete.

INTERROGATORY NO. 9: Please identify each individual who assisted in or participated in the preparation of the responses to this discovery, providing their name, business address, and telephone number.

Response: Peni Barfield, Sharon Litke, and Jennifer Hall
7900 John Carpenter Freeway
Dallas, TX 75247
(214) 630-6700

REQUEST FOR ADMISSION NO. 1: Admit that Revolution submitted the same disputed charges multiple times under different file numbers without advising AT&T Ohio that it was doing so.

Response: Some disputed charges were resubmitted; in some situations, AT&T was definitely told beforehand, but possibly not always.

REQUEST FOR PRODUCTION NO. 1: Please provide a copy of each document you plan to or will offer as an exhibit in this case.

Response: We have not identified these yet, but will produce these documents when identified.

Revolution Communications, Ltd. v. AT&T Ohio
Case No. 06-427-TP-CSS

AT&T Ohio's Exhibit List

AT&T Ohio Exhibit 1 - rebuttal testimony of Michele Barnes, filed September 29, 2006

AT&T Ohio Exhibit 2 - rebuttal testimony of Frederick C. Christensen, filed September 29, 2006

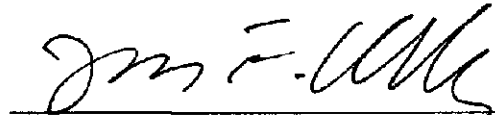
AT&T Ohio Exhibit 3 - rebuttal testimony of Donna Navickas, filed September 29, 2006

AT&T Ohio Exhibit 4 - rebuttal testimony of J. Scott McPhee, filed September 29, 2006

AT&T Ohio Exhibit 5 - Revolution's responses, dated August 9, 2006, to AT&T Ohio's first set of discovery requests, filed September 19, 2007.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on September 19, 2007 by e-mail or by hand delivery, as indicated, on the following parties:


Jon F. Kelly

Revolution Communications, Ltd.

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