BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: Docket No. 32235: Generic Proceeding to Implement House Bill 168

STAFF'S FIRST SET OF DATA REQUESTS
TO BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T GEORGIA

TO: BellSouth Telecommunications, LLC d/b/a AT&T Georgia ("AT&T Georgia")

COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by the Company or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that responses be filed with the Executive Secretary of the Commission in conformance with the Alternative Electronic Filing Procedures. If a document is created in an electronic spreadsheet format, please file the document in that form.

Please provide responses by May 14, 2023.

DEFINITIONS

As may be used in this document:

1. "Company" or "The Utility" and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

2. The term "you" and "your" refer to "the Company."

3. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term "document" or "documentation" shall have the broadest possible meaning under applicable law. "Document" or "documentation" means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications,

books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" or "documentation" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term "referring or relating to" means consisting of containing mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

6. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would not otherwise be brought within their scope.

7. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

8. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

a) the type of document (e.g., letter, memorandum, etc.);
b) the date of the document; the title or label of the document;

c) the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;

d) the identity of each person to whom it was sent;

e) the identity of each person to whom a copy or copies were sent;

f) a summary of the contents of the document;

g) the name and last known address of each person who presently has possession, custody or control of the document;

h) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

11. "Identify", "identifying" or identity" when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information including such information as first comes available to the Respondent after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

d) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls,

meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

GEORGIA PUBLIC SERVICE COMMISSION STAFF'S
FIRST SET OF DATA REQUESTS TO BELLSOUTH
TELECOMMUNICATIONS, LLC D/B/A AT&T GEORGIA
Docket No. 32235

STF-1-1 On October 28, 2022, AT&T Georgia filed a letter with the Commission in Docket No. 32235, in which it stated that it had been including affiliate transaction revenue in the intrastate revenue that is subject to its contributions to the UAF.

(a) How is AT&T Georgia compensated by its affiliates for intrastate telecommunications services? (*e.g.* do affiliates make monetary payments to AT&T Georgia or are dollar amounts imputed?)

(b) Separately stated for the 3rd and 4th quarters of 2022, please identify the dollar amount of intrastate telecommunications services revenue from each AT&T affiliate, broken out by affiliate, that AT&T Georgia is now excluding from the UAF calculation.

(c) Please identify the number of retail access lines AT&T Georgia has.

(d) Please identify the number of official access lines (i.e., for internal use at AT&T Georgia) AT&T Georgia has.

STF-1-2 In its October 28, 2022 letter, AT&T Georgia stated that the affiliate transaction revenue is not included in revenue subject to its contributions under the Federal Universal Service Fund.

(a) Is it AT&T Georgia's position that because the affiliate transaction revenue is not included in revenue subject to its contributions under the Federal Universal Service Fund that the revenue should not be included in the revenue subject to its contributions to the UAF? If so, please provide any and all reasons in support of this position.

(b) Please state any other basis AT&T Georgia has for its position that affiliate transaction revenue should not be included in revenue subject to its contributions under the UAF.

CERTIFICATE OF SERVICE

I, Patrick Reinhardt, hereby certify that the foregoing First Set of Data Requests to BellSouth Telecommunications, LLC d/b/a AT&T Georgia in Docket No. 32235 was served upon all parties of record listed below by depositing same in the United States mail with sufficient postage thereon to ensure delivery.

BELLSOUTH TELECOMUNICATIONS, LLC D/B/A AT&T GEORGIA
*Mr. Patrick Turner
AVP-Senior Legal Counsel
AT&T Georgia, South Carolina, and Tennessee
One CNN Center, SW1424B
Atlanta, Georgia 30303
404-893-7940 (Office)
803-629-4195 (Mobile)
pt1285@att.com

GEORGIA PUBLIC SERVICE COMMISSION
*Ms. Sallie Tanner
Executive Secretary
244 Washington Street, SW
Atlanta, GA 30334

So certified this the 14th day of April 2023.

/s/ Patrick Reinhardt
Patrick Reinhardt

* denotes electronic delivery