

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements) Docket No. 990649A-TP
) Filed: January 24, 2002
)

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
AND MCI WORLDCOM, INC.'S JOINT SUPPLEMENTAL RESPONSES
TO BELL SOUTH'S FIRST DATA REQUEST**

AT&T Communications of the Southern States, Inc. ("AT&T") and MCI WorldCom, Inc. ("MCI"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.350 and 1.280, Florida Rules of Civil Procedure, hereby submit the following Supplemental Responses to BellSouth's First Data Request to AT&T and MCI.

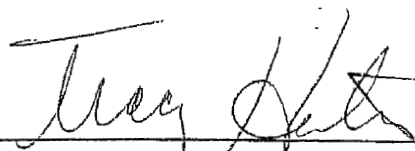
DATA REQUEST NO. 3: Produce copies of all documents pertaining to the engagement of Mr. Pitkin to perform work on behalf of AT&T and/or MCI in this docket, including but not limited to contracts, engagement letters, status memos and invoices for work performed.

AT&T/MCI's Response: See Attachment 1.

DATA REQUEST NO. 4: Produce copies of all documents pertaining to the engagement of Mr. Donovan to perform work on behalf of AT&T and/or MCI in this docket, including but not limited to contracts, engagement letters, status memos and invoices for work performed.

AT&T/MCI's Response: See Attachment 1.

SUBMITTED this 24th day of January, 2002

A handwritten signature in black ink, appearing to read "Tracy Hatch", is written over a horizontal line.

TRACY W. HATCH, ESQ.

FLOYD R. SELF, ESQ.

MESSER, CAPARELLO & SELF, P. A.

Post Office Box 1876

Tallahassee, FL 32302-1876

(850) 222-0720

Attorney for AT&T Communications of the
Southern States, Inc.

and

Donna McNulty, Esq.

— MCI WorldCom, Inc.

The Atrium Building, Suite 105

325 John Knox Road

Tallahassee, FL 32303

**SUPPLEMENTAL RESPONSE OF AT&T/MCI WORLDCOM TO
BELLSOUTH'S FIRST SET OF DATA REQUESTS NOS. 1-15**

Data Request 3:

Produce copies of all documents pertaining to the engagement of Mr. Pitkin to perform work on behalf of AT&T and/or MCI in this docket, including but not limited to contracts, engagement letters, status memos and invoices for work performed.

See Attachment 1.

Data Request 4:

Produce copies of all documents pertaining to the engagement of Mr. Donovan to perform work on behalf of AT&T and/or MCI in this docket, including but not limited to contracts, engagement letters, status memos and invoices for work performed.

See Attachment 1.

ATTACHMENT 1

**THE ATTACHED DOCUMENT IS HIGHLY PROPRIETARY AND
CONFIDENTIAL**

ATTACHMENT 1

[REDACTED]

BellSouth 120-Day proceeding is shown in the attached document. The hourly rates for Mr. Pitkin and Mr. Donovan are shown below.

The hourly rates for Mr. Pitkin and Mr. Donovan for the BellSouth 120-Day proceeding are as follows:

[REDACTED]

[REDACTED]

The attached memo from Greg Darnell of MCIWorldCom to Brian Sulmonetti shows the budgeted amounts for Mr. Pitkin and Mr. Donovan for the Florida BellSouth 120-Day proceeding. The document has been redacted to remove information not related to the Florida proceeding.

—Original Message—

From: Greg Darnell [mailto:Greg.Darnell@wcom.com]

Sent: Friday, September 07, 2001 9:30 AM

To: 'brian.sulmonetti@wcom.com'

Subject: Florida [REDACTED] Budget Estimates

Brian,

Here it is:

BellSouth Florida - Material Input Values Case

Brian Pitkin - Recurring Cost Modeling
John Donovan Input Values
Greg Darnell Pricing

Case II