

From: Ahlers, Dennis D. [<mailto:ddahlers@eschelon.com>]  
Sent: Thursday, November 13, 2003 12:58 PM  
To: 'Kopta, Greg'  
Subject: FW: Summary of call on discovery

Greg-This thing was done fairly informally in Minnesota by agreement of the parties. In addition to the document I am faxing to you here are emails that summarize the process agreed to. Susan Peirce, who is the one making this happen, is with the MN Dept. of Commerce, which in most states would be the equivalent of the Commission advocacy staff. The Dept. was put in charge of coordinating the discovery by the Commission.

Dennis D. Ahlers, Senior Attorney, Eschelon Telecom, Inc. Phone: 612-436-6249, Fax: 612-436-6349.. NOTICE-CONFIDENTIAL INFORMATION The information in this communication is privileged and strictly confidential. It is intended solely for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, any dissemination, distribution, copying or other use of the information contained in this communication is strictly prohibited. If you have received this communication in error, please first notify the sender immediately and then delete this communication from all data storage devices and destroy all hard copies.

> -----Original Message-----

> From: Lipschultz, Dan [SMTP:LipschultzD@moss-barnett.com]  
> Sent: Monday, October 20, 2003 6:56 PM  
> To: 'Susan Peirce'; thomas.dethlefs@qwest.com; decook@ATT.COM;  
> cattanach.robert@dorsey.com; corey@deskmedia.com;  
> Curtis.Nelson@state.mn.us; Lipschultz, Dan; ddahlers@eschelon.com;  
> douglas.nelson@kmctelecom.com; gregory.merz@gpmlaw.com;  
> janetbrowne@ATT.COM; jtopp@qwest.com; Jeanne.Cochran@state.mn.us;  
> jjoxley@eschelon.com; JDevaney@perkinscoie.com;  
> joy.gullikson@onvoy.com; kframe@covad.com;  
> kenneth.schifman@mail.sprint.com; ksaville@czn.com;  
> lesley.lehr@wcom.com; lhankins@covad.com; mayotte@briggs.com;  
> marva.johnson@kmctelecom.com; Mary.Mckinley@state.mn.us;  
> mbtribby@ATT.COM; Bradley, Michael J.; mzulevic@covad.com; Johnson,  
> Richard J.; shofstetter@ATT.COM; heim.shannon@dorseylaw.com;  
weigler@ATT.COM; tbailey@briggs.com  
> Cc: Diane Wells; Greg Doyle; Hammel, Karen; Patel, Priti; Ed Fagerlund  
> Subject: RE: Summary of call on discovery  
>  
>

> This looks accurate to me. We also agreed that no carrier, by virtue  
> of its participation, comments or agreement with decisions on today's  
> call, was waiving its right to challenge any discovery requests on any  
> grounds. Is that consistent with the understanding of others? Thanks.  
>

> -----Original Message-----

> From: Susan Peirce [<mailto:Susan.Peirce@state.mn.us>]  
> Sent: Monday, October 20, 2003 4:01 PM  
> To: thomas.dethlefs@qwest.com; decook@ATT.COM;  
> cattanach.robert@dorsey.com; corey@deskmedia.com;  
> Curtis.Nelson@state.mn.us; lipschultzd@moss-barnett.com;  
> ddahlers@eschelon.com; douglas.nelson@kmctelecom.com;

> gregory.merz@gpmlaw.com; janetbrowne@ATT.COM; jtopp@qwest.com;  
> Jeanne.Cochran@state.mn.us; jjoxley@eschelon.com;  
> JDevaney@perkinscoie.com; joy.gullikson@onvoy.com; kframe@covad.com;  
> kenneth.schifman@mail.sprint.com; ksaville@czn.com;  
> lesley.lehr@wcom.com; lhankins@covad.com; mayotte@briggs.com;  
> marva.johnson@kmctelecom.com; Mary.Mckinley@state.mn.us;  
> mbtribby@ATT.COM; bradley@moss-barnett.com; mzulevic@covad.com;  
> johnsonr@moss-barnett.com; shofstetter@ATT.COM;  
> heim.shannon@dorseylaw.com; weigler@ATT.COM; tbailey@briggs.com  
> Cc: Diane Wells; Greg Doyle; Hammel, Karen; Patel, Priti; Ed Fagerlund  
> Subject: Summary of call on discovery  
>  
>  
> Here's a summary of the discussion on masking that we had on today's  
> call.  
>  
> The DOC will develop a code for masking CLEC responses. CLECs should  
> contact Sue Peirce (please, not until after the discovery has actually  
> gone out) to obtain their code.  
>  
> CLEC Responses to IRs  
>  
> If public, CLECs will file with all parties.  
> If confidential (yellow), or highly sensitive trade secret (pink) or a  
> mixture, the CLEC will file one masked and two unmasked copies with  
> the DOC, and an unmasked copy with the RUD. The DOC will pass along  
> the masked responses to all parties. Per Ed F. remember to mask switch  
> CLLI codes and locations.  
>  
> Qwest Responses to IRs containing CPNI data:  
>  
> Qwest will mask the data, and provide to all parties. Qwest will  
> provide an unmasked copy/list of the codes to the DOC and RUD. Jason  
> indicated that he thought Qwest needed an ALJ order to produce CPNI  
> data, and he would pursue obtaining this.  
>  
> I hope I captured this accurately.  
>  
> Sue  
>