



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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O1 Communications, Inc. (U 6065 C),

Complainant,

v.

New Cingular Wireless PCS, LLC (U 3060 C) and
AT&T Mobility Wireless Operations Holdings, Inc.
(U 3021 C),

Defendants.

C.15-12-020
(Filed December 28, 2015)

**RESPONSE OF
NEW CINGULAR WIRELESS PCS, LLC (U 3060 C) AND AT&T MOBILITY
WIRELESS OPERATIONS HOLDINGS, INC. (U 3021 C)
TO O1 COMMUNICATIONS' (U 6065 C)
EXPEDITED MOTION TO COMPEL
PRODUCTION OF DOCUMENTS WITHHELD**

DAVID J. MILLER
MARGARET THOMSON
430 Bush Street, 3rd Floor
San Francisco, CA 94108
Tel: (415) 268-8977
Fax: (415) 543-0418
E-mail: mt4348@att.com

PAUL WALTERS, JR.
17 E. 1st Street
Edmond, OK 73034
Tel: (405) 359-1718
Mobile: (405) 388-4562
E-mail: pwalters@sbcglobal.net
Counsel for AT&T Mobility

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New Cingular Wireless PCS, LLC (U-3060-C) and AT&T Wireless Operations Holdings, Inc. (U-3021-C) respectfully submit this response to the Motion to Compel Production of Documents Withheld (“Motion to Compel”) filed by O1 Communications (“O1”) on July 5, 2016.

AT&T Mobility has agreed to produce all agreements dating back to January 2013¹ between AT&T Mobility and other carriers that address direct interconnection in California pursuant to the email from Administrative Law Judge Kelly dated June 30, 2016, “strongly [encouraging] the parties to work this out.” AT&T Mobility believes this renders moot O1’s Motion to Compel.

AT&T Mobility has agreed to produce these documents despite believing it has a basis not to produce them. First, AT&T Mobility believes these agreements are not relevant to the instant proceeding. Second, AT&T Mobility believes that production of AT&T Mobility’s agreements with other carriers appears to be inconsistent with ALJ Kelly’s denial of AT&T Mobility’s Motion to Compel Production of Documents responsive to AT&T Mobility Data Request No. 1-18 for interconnection agreements between O1 and other carriers under the Commission’s jurisdiction.

Throughout this proceeding, AT&T Mobility has responded to O1’s data requests in good faith. To date, AT&T Mobility has produced 987 pages of documents. O1 has produced 51 pages.

¹ AT&T Mobility does not have records allowing it to identify agreements prior to January 2013 that have since expired.

