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July 10, 2012

VIA OVERNIGHT MAIL

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

RECEIVED

JUL 11 2012

PUBLIC SERVICE
COMMISSION

Re: BellSouth Telecommunications, LLC, d/b/a AT&T
Kentucky, Complainant v. Halo Wireless, Inc., Defendant
PSC 2011-00283

Dear Mr. Derouen:

Enclosed for filing are the original and ten (10) copies of AT&T Kentucky's Supplemental Responses to Interrogatory No. 2 and Request for Production No. 5 propounded by Halo Wireless in its First Set of Data Requests.

Please let me know if you have any questions.

Sincerely,

Mary K. Keyer

Enclosures

cc: Parties of Record

1039988

INTERROGATORY: Identify all Persons you plan to call as expert witnesses at the trial of the Complaint.

ANSWER: AT&T Kentucky supplements its Answer to Interrogatory No. 2 to indicate that in addition to Mark Neinast and J. Scott McPhee, AT&T Kentucky plans to call Raymond Drause as a witness in this case to testify to facts and opinions. To the extent that this Interrogatory asks AT&T Kentucky to identify fact witnesses as distinct from expert witnesses, AT&T Kentucky objects to the Interrogatory on the grounds that the information it seeks is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: All Documents that any witness proffered by AT&T reviewed or referred to in connection with any testimony or opinions being submitted in this proceeding.

RESPONSE: AT&T Kentucky refers Halo to the DVD-R and the flash drive provided on April 16, 2012, in AT&T South Carolina's response to Item No. 9 of Halo's First Request for Production of Documents in the parallel South Carolina case. The DVD-R contains confidential information relied upon by AT&T Kentucky witnesses Scott McPhee and/or Mark Neinast. The flash drive contains confidential information relied upon by AT&T Kentucky witness Raymond Drause. Mr. Drause lists in his rebuttal testimony filed on July 10, 2012, other materials he reviewed in preparing his testimony. Halo either has, or can readily obtain from publicly available sources, the items identified by Mr. Drause.

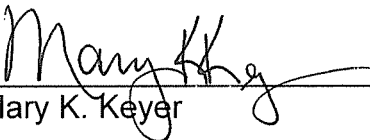
CERTIFICATE OF SERVICE – PSC 2011-00283

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof via U.S. Mail, this 10th day of July 2012.

Russell Wiseman
President & CEO
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