

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

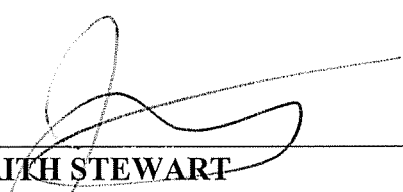
Complaint of America Federal )  
Of State, County, Municipal Employees )  
Council 62 (AFSCME Council 62) ) CASE NO. 2004-00250  
Against AT&T Communications of the )  
South Central States, LLC )

**REPLY TO ANSWER OF AT&T COMMUNICATIONS OF THE  
SOUTH CENTRAL STATES, LLC**

Plaintiff, American Federal State, County, Municipal Employees hereby replies to the Answer of AT&T Communications of the South Central States, LLC ("AT&T") as follows:

1. In response to Defendant AT&T's Second Defense, new invoices were sent to the Indianapolis office with the same address and name as previously billed. Since there were no notations or written changes to their billing procedures, it is reasonably expected that the previously contracted billing arrangement was in effect.

Respectfully submitted,



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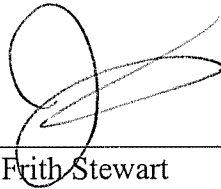
**JOHN FRITH STEWART**  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Reply to the Answer of AT&T Communications of the South Central States, LLC filed on behalf of the American Federation of State, County, Municipal Employees, Local 62 was served upon all parties of records this 9<sup>th</sup> day of September, 2004.

Martha Ross-Bain  
AT&T Communications of the Southern  
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Atlanta, GA 30309

C. Kent Hatfield  
Stoll, Keenon & Park, LLP  
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John Frith Stewart



Memo

September 7, 2004

To: John Stewart

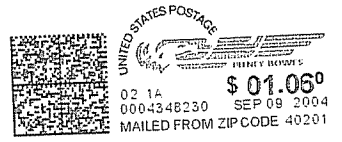
From: Roger Poer, Controller  
AFSCME Council 62

Subject: AT& T billing before the Public Service Commission

In response to there second defense; new bills were sent to Indianapolis office, at the same address and in the same name as previously billed. No notation was made on there bills that billing method had changed. Therefore, it reasonable to expect that our previous contracted billing arrangement had continued.

Frankly, I don't follow the other defenses; they lack knowledge of details of their billing?





**SEGAL STEWART CUTLER**  
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