

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

BELLSOUTH
TELECOMMUNICATIONS, LLC
D/B/A AT&T KENTUCKY

JUL 03 2012

PUBLIC SERVICE
COMMISSION

COMPLAINANT

CASE NO. 2011-00283

V.

HALO WIRELESS, INC.

RESPONDENT

**HALO WIRELESS, INC.'S OBJECTIONS AND/OR RESPONSES
TO FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS OF AT&T KENTUCKY**

TO: BellSouth Telecommunications, LLC. d/b/a AT&T Kentucky (AT&T), by and through its counsel of record, Mary K. Keyer, Esq., 601 W. Chestnut Street, Room 407, Louisville, Kentucky 40202.

COMES NOW, Halo Wireless, Inc. (Halo) hereby serves its Objections and/or Responses to First Set of Interrogatories and Request for Production of Documents of AT&T Kentucky as follows:

GENERAL OBJECTIONS AND CONDITIONS TO RESPONSES

1. These objections and responses are based upon Halo=s present knowledge after a reasonable investigation and upon Halo=s interpretation and construction of AT&T Kentucky's Interrogatories and Request for Production of Documents.

2. Halo makes any answer to these interrogatories and request for production of documents without waiving or intending to waive but, on the contrary, preserving and intending

to preserve: (a) the right to object to, on the grounds of authenticity, admissibility, competency, privilege, relevance, or materiality, or any other proper grounds, the use of such documents or information for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action; (b) the right to object on any and all grounds, at any time, to other requests for production, or other discovery procedures involving or relating to the subject of the request for production to which Halo has responded herein; and (c) the right to supplement any of the responses made herein. Inadvertent production of any alleged privileged document shall not be deemed a waiver of any applicable privilege with respect to such document or any other document.

3. Halo objects to the requests for production of documents not within Halo's possession, custody or control. Any response that Halo will produce certain documents is not a representation that such documents exist and are in Halo's possession, custody or control. Halo reserves the right to amend or supplement these responses as appropriate.

4. Halo objects to these interrogatories and requests for production to the extent they seek information that is confidential to Halo. To the extent Halo is required to produce any such documents, Halo requests an appropriate protective order to preserve the confidentiality of the information in the documents.

5. All discoverable documents in response to the interrogatories and requests for production have been, or will be, produced to AT&T Kentucky.

6. Halo objects to these interrogatories and requests for production to the extent that they seek to impose upon Halo obligations greater than those arising under the Kentucky Rules of Civil Procedure.

OBJECTIONS AND/OR ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1 (DATA REQUEST NO. 1):

Referring to page 3, lines 9-10 and 22 of the Pre-Filed Testimony of Russ Wiseman on Behalf of Halo Wireless, Inc., filed May 11, 2012, in Florida Public Service Commission Docket No. 110234-TP (“Wiseman Florida Testimony”), identify with specificity each “novel, but legal way” and each of the “different, but legal ways” in which Halo has interpreted and applied telecommunications laws and rules and explain, for each such way, in what sense it is “different” or “novel.”

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds that its business model was novel and different, while also being legal, in that upon information and belief, Halo was the first small company market entrant to utilize the various federal and FCC rules, regulations, and precedents regarding enhanced service providers (“ESPs”) and commercial mobile radio service (“CMRS”) to configure its network in the specific way it does to provide wireless telephone exchange service and/or exchange access services to communications-intensive ESP business end users. Halo’s model was also novel in that it used the same common infrastructure to deliver wireless broadband services and interconnected service to consumers and small businesses. In short, this business model provided Halo a significant source of revenue that could effectively subsidize the build-out, operation and delivery of rural broadband in a financially sustainable way without the need for government subsidies, without customers worrying of Halo going broke, and on a scale that could put a real dent in the nation's goal of getting broadband to rural communities. Further response to these questions can be found in previously filed testimony, transcripts, and other documents filed in other similar proceedings in which Halo and AT&T are parties, which documents will be produced to AT&T Kentucky. Such documents speak for themselves.

INTERROGATORY NO. 2 (DATA REQUEST NO. 4):

Referring to page 3, lines 12-14 of the Wiseman Florida Testimony, explain how “Halo’s participation in the Florida broadband communications market has . . . lower[ed] cost for a great number of consumers”; state whether any of the referenced consumers are Florida consumers; identify the costs that have been reduced for the consumers; and explain how those costs have been reduced.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds that Halo’s participation in the market has lowered cost for a great number of consumers because Halo’s business model utilizes the various federal and FCC rules, regulations, and precedents regarding ESPs and CMRS to provide wireless services directly to its customers at a legally lower rate. Major providers of communications services voluntarily choose to purchase services from Halo’s customer Transcom, and incorporate them into the delivery of services to their own consumer customers, including presumably Florida consumers. As a result, Halo’s participation has at least indirectly resulted in cost saving to all parties involved. Further response to these questions can be found in previously filed testimony, transcripts, and other documents filed in other similar proceedings in which Halo and AT&T are parties, which documents will be produced to AT&T Kentucky. Such documents speak for themselves.

INTERROGATORY NO. 3 (DATA REQUEST NO. 3):

Explain the purpose of Halo’s insertion of Transcom’s Charge Number into call records as summarized at p. 10, lines 7-11, of the Wiseman Florida Testimony, and how the insertion of

Transcom's Charge Number into call records accomplishes or helps accomplish (or could accomplish or help accomplish) that purpose. The explanation should, without limitation, state whether the identification Transcom (and other potential high volume customers of Halo) as the financially responsible party(ies) was intended to facilitate Halo's billing of Transcom (and other potential high volume customers of Halo); or the terminating carriers' billing of Transcom (and other potential high volume customers of Halo); or both or neither. The explanation should also include the means by which the insertion of Charge Numbers would facilitate that billing.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo responds that until December 2011, it populated the charge number parameter with the billing telephone number of the financially responsible party, consistent with industry practices. The purpose of Halo's practice (and the industry practice) was to ensure that Halo's billing records and the records of any other carriers to whom Halo was obligated to pass records established the proper financially responsible party. In the case of any records up to December 2011, in which Transcom was designated as the financially responsible party, Transcom was so designated because consistent with industry practice, Transcom originated the call at issue (as an end user) and was therefore the financially responsible party even if (contrary to Halo's contentions) Transcom was not the originating party. Further response to these questions can be found in previously filed testimony, transcripts, and other documents filed in other similar proceedings in which Halo and AT&T are parties, which documents will be produced to AT&T Kentucky. Such documents speak for themselves.

INTERROGATORY NO. 4 (DATA REQUEST NO. 4):

Referring to page 31, lines 4-6, of the Wiseman Florida Testimony, identify all persons who participated in or advised on the design of “our business plan,” including attorneys.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds that Jody Craft, Scott Birdwell, Nate Nelson and Halo’s attorneys, W. Scott McCollough and Steve Thomas, each participated in the discussion and design of Halo’s business plan. The participation of Jody Craft, Scott Birdwell, Nate Nelson involved the review of applicable federal and FCC rules, regulations, and precedents regarding ESPs and CMRS and planning of Halo’s business and network configuration to comply with same. W. Scott McCollough and Steve Thomas each participated as attorneys to Halo and advised Halo with respect to the applicable federal and FCC rules, regulations, and precedents regarding ESPs and CMRS and the manner in which Halo could comply with same. Further response to these questions can be found in previously filed testimony, transcripts, and other documents filed in other similar proceedings in which Halo and AT&T are parties, which documents will be produced to AT&T Kentucky. Such documents speak for themselves.

INTERROGATORY NO. 5 (DATA REQUEST NO. 5):

Referring to page 42, lines 6-8 of the Wiseman Florida Testimony, identify all agents, representatives, employees, officers, counsel or other persons acting on behalf of Halo who “relied on all of this precedent.”

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing

Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo responds that in addition to the persons identified in Halo's response to this Interrogatory, all of the officers of Halo as well as those performing work on behalf of Halo relied on the referenced precedent. Further response to these questions can be found in previously filed testimony, transcripts, and other documents filed in other similar proceedings in which Halo and AT&T are parties, which documents will be produced to AT&T Kentucky. Such documents speak for themselves.

INTERROGATORY NO. 6 (DATA REQUEST NO. 8):

Referring to page 37, lines 15-17 of the Wiseman Florida Testimony, does Halo deny that some calls ultimately sent by Halo to AT&T Florida for termination started on landline equipment? If so, state the basis for Halo's denial.

ANSWER:

Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. The term "landline" is not defined in the Requests, applicable tariffs, or the applicable FCC rules. Halo also does not have an independent understanding of the meaning of that term and therefore cannot respond until the term is defined. Because additional clarification is required to further object or respond to this Request, Halo reserves the right to supplement its objections herein and respond subject to and without waiver of such further objections. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

INTERROGATORY NO. 7 (DATA REQUEST NO. 9):

Referring to page 37, lines 15-17 of the Wiseman Florida Testimony, has Halo taken any measures to avoid sending to AT&T Kentucky calls that started on landline equipment? If so, please describe each such measure and state when Halo employed that measure.

ANSWER:

Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. The term “landline” is not defined in the Requests, applicable tariffs, or the applicable FCC rules. Halo also does not have an independent understanding of the meaning of that term and therefore cannot respond until the term is defined. Because additional clarification is required to further object or respond to this Request, Halo reserves the right to supplement its objections herein and respond subject to and without waiver of such further objections. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

INTERROGATORY NO. 8 (DATA REQUEST NO. 10):

Referring to page 45, line 15 of the Wiseman Florida Testimony, please identify the persons who are on the board of Halo and the persons who are on the board of Transcom.

ANSWER:

Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for information from a non-party.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds as follows: Scott Birdwell, Director of Halo; Information concerning the officers, directors and shareholders of Halo may be obtained from the Statement of Financial Affairs filed with the United States Bankruptcy Court for the Eastern District of Texas, Sherman Division (Case No. 11-42464). Information concerning Transcom’s officers and directors may be obtained from Transcom and public records maintained by the Texas Secretary of State.

INTERROGATORY NO. 9 (DATA REQUEST NO. 11):

Of all calls that Halo delivers to AT&T Kentucky for termination to AT&T Kentucky’s end user customers or for delivery to other carriers, what is Halo’s best estimate of the percentage that started on landline equipment and what is the basis for that estimate?

ANSWER:

Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. The term “landline” is not defined in the Requests, applicable tariffs, or the applicable FCC rules. Halo also does not have an independent understanding of the meaning of that term and therefore cannot respond until the term is defined. Because additional clarification is required to further object or respond to this Request, Halo reserves the right to supplement its objections herein and respond subject to and without waiver of such further objections. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

INTERROGATORY NO. 10 (DATA REQUEST NO. 12):

Describe the “alternate arrangements for the termination of InterMTA traffic” referenced in the September 30, 2010, letter from Carolyn Malone to Randy Ham that is Exhibit RW-2 to the Wiseman Florida Testimony.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds that if a call from a low volume customer would be deemed to be between two MTAs, Halo sends it to other vendors for completion at the appropriate rate. If a call from a high volume customer is addressed to a telephone number associated with a rate center in an MTA other than the tower where the high volume customer originates the further communications, Halo rejects the call and it is not completed.

INTERROGATORY NO. 11 (DATA REQUEST NO. 13):

Referring to page 7, lines 6-7 of the Pre-Filed Rebuttal Testimony of Robert Johnson in Florida Public Service Commission Docket No. 110234-TP (“Johnson Florida Rebuttal”), has there ever been an instance in which a Transcom customer has sent traffic to an “enhanced service

session” other than traffic that was to be transported by Halo to a carrier for eventual termination to a called party? If not, could a Transcom customer do such a thing? If so, how?

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is confidential or proprietary and seeks information from Halo about a third party’s business operations. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, and responding using the characterizations in the Request without agreeing to those characterizations, Halo responds that upon information and belief there are instances in which a Transcom customer has sent traffic to an “enhanced service session” other than traffic that was to be sent by Halo to a carrier for eventual termination to a called party. For example, upon information and belief, there are instances in which a Transcom customer has sent traffic to an “enhanced service session” and Transcom has selected another vendor to arrange for completion of that traffic. Accordingly, the second subpart of this interrogatory is inapplicable.

INTERROGATORY NO. 12 (DATA REQUEST NO. 14):

Referring to page 19, lines 1-10 of the Johnson Florida Rebuttal, if a Transcom customer’s traffic is IP-originated, what benefits, if any, that the customer can obtain by certifying to Transcom that the traffic is IP-originated.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is confidential or proprietary and seeks information from Halo regarding a third party’s operations. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo’s general and specific objections and conditions, and without waiving the same, Halo responds that upon information and belief, if a Transcom customer’s traffic is

certified as IP-originated it may have access to a larger termination footprint for the enhanced sessions it receives from Transcom and in some case lower prices.

INTERROGATORY NO. 13 (DATA REQUEST NO. 15):

If Transcom's customer certifies that its traffic is IP-originated, does Transcom do anything to confirm that the certification is true? If so, identify all measures that Transcom has taken to confirm a customer certification that its traffic is IP-originated.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo further objects to this interrogatory on the ground that it includes separate and distinct requests that are appropriate for individual interrogatories. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion and seeks information from Halo regarding a third party's operations.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo responds that upon information and belief, there are no technical means by which a provider who receives traffic from another provider can definitively determine if that traffic was IP-originated or not other than to rely on the certification of the sending provider. Accordingly, Interrogatory subpart 12(b) is not applicable.

INTERROGATORY NO. 14 (DATA REQUEST NO. 16):

If a Transcom customer falsely certifies that its traffic is IP-originated, what undesired or adverse consequences, if any, that customer might experience as a result of the false certification.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks information that is confidential or proprietary. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo also objects

to this Interrogatory on the ground that it asks for a legal conclusion and seeks information from Halo regarding a third party's operations.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo responds that upon information and belief, any false certification of traffic would constitute a breach of the customer's contract with Transcom and trigger potential penalty provisions or other legal action.

INTERROGATORY NO. 15 (DATA REQUEST NO. 17):

Referring to page 7, lines 9-10 of the Johnson Florida Rebuttal, of the "host of different kinds of companies" that Transcom serves, please identify all kinds in addition to the kinds identified.

ANSWER:

Halo objects to this interrogatory to the extent that it seeks information that is confidential or proprietary and seeks information from Halo regarding a third party's customers and operations. Halo also objects to the foregoing Interrogatory for the reason said Interrogatory is vague and ambiguous. Halo also objects to this Interrogatory on the ground that it asks for a legal conclusion.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo responds that upon information and belief, there are very few, if any, providers that would fit neatly and exactly into one and only one category, but upon information and belief virtually all of the providers who are customers of Transcom fit into at least one of the 3 categories provided.

INTERROGATORY NO. 16 (DATA REQUEST NO. 18):

Please admit that the traffic that Halo delivers to AT&T Kentucky, some (including traffic that is delivered by Transcom's customer to Transcom in IP format) has not been enhanced by Transcom in the manner described at page 14, line 10, to page 16, line 5, of the Johnson Florida Rebuttal. If your answer is anything other than an unqualified admission, please explain why your answer is not an unqualified admission in light of the deposition testimony of Robert Johnson on

May 22, 2012, to the effect that Transcom does not enhance all traffic that is delivered to Transcom in IP format, including traffic that Transcom delivers to Halo.

ANSWER:

Halo objects to this interrogatory/request for admission to the extent that it seeks information that is confidential or proprietary and seeks information from Halo regarding a third party's customers and operations. Halo further objects to this interrogatory/request for admission on the ground that it includes separate and distinct requests that are appropriate for individual discovery requests. Halo also objects to the foregoing interrogatory/request for admission for the reason said interrogatory/request for admission is vague and ambiguous, and was clearly intended for a proceeding pending in Kentucky and not with this Commission.

Subject to Halo's general and specific objections and conditions, and without waiving the same, Halo denies AT&T's Request for Admission.

OBJECTIONS AND/OR RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST NO. 1 (DATA REQUEST NO. 2):

Please produce the presentations referred to on page 5, line 22, of the Wiseman Florida Testimony.

RESPONSE:

Halo objects to this request as being vague, overly broad and failing to describe the documents requested with reasonable particularity. Halo further objects to this request to the extent that it seeks documents that are confidential or proprietary.

Subject to Halo's general and specific objections and conditions, and without waiving same, responsive, non-privileged, documents relating to this request Halo will produce documents to Plaintiff upon execution of a confidentiality agreement.

REQUEST NO. 2 (DATA REQUEST NO. 4):

Referring to page 31, lines 4-6, of the Wiseman Florida Testimony, ... [p]roduce all documents setting forth or memorializing the business plan, and all documents relating to the establishment or design of the business plan, including, without limitation, all documents reflecting or relating to the perceptions of regulatory counsel described in the Wiseman Florida testimony at p. 7, line 12, to p. 8, line 2.

RESPONSE:

Halo objects to this request as being vague, overly broad and failing to describe the documents requested with reasonable particularity. Halo further objects to this request to the extent that it seeks documents that are protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks documents that are confidential or proprietary.

Subject to Halo's general and specific objections and conditions, and without waiving same, responsive, non-privileged, documents relating to this request Halo will produce documents to Plaintiff upon execution of a confidentiality agreement.

REQUEST NO. 3 (DATA REQUEST NO. 5):

Referring to page 42, lines 6-8 of the Wiseman Florida Testimony, ... [p]lease produce all documents evidencing, reflecting or otherwise relating to the [stated reliance “on all of this precedent.”]

RESPONSE:

Halo objects to this request as being vague, overly broad and failing to describe the documents requested with reasonable particularity. Halo further objects to this request to the extent that it seeks documents that are protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks documents that are confidential or proprietary.

Subject to Halo’s general and specific objections and conditions, and without waiving same, responsive, non-privileged, documents relating to this request Halo will produce documents to Plaintiff upon execution of a confidentiality agreement.

REQUEST NO. 4 (DATA REQUEST NO. 6):

Please produce all documents that support or otherwise relate to the statement at p. 37, lines 10-12 of the Wiseman Florida Testimony that “We relied on the D.C. Circuit’s holding in *Bell Atlantic* that ESP’s originate traffic when this clause was being negotiated.”

RESPONSE:

Halo objects to this request as being vague, overly broad and failing to describe the documents requested with reasonable particularity. Halo further objects to this request to the extent that it seeks documents that are protected by the attorney-client privilege and/or work product doctrine and to the extent that it seeks documents that are confidential or proprietary.

Subject to Halo’s general and specific objections and conditions, and without waiving same, responsive, non-privileged, documents relating to this request Halo will produce documents to Plaintiff upon execution of a confidentiality agreement.

REQUEST NO. 5 (DATA REQUEST NO 7):

Please produce all documents that support or otherwise relate to the statements at p. 63, lines 2-4 of the Wiseman Florida Testimony concerning what Halo told AT&T or information that Halo provided to AT&T.

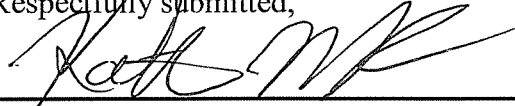
RESPONSE:

Halo objects to this request as being vague, overly broad and failing to describe the documents requested with reasonable particularity. Halo further objects to this request to the extent that it seeks documents that are confidential or proprietary.

Subject to Halo's general and specific objections and conditions, and without waiving same, responsive, non-privileged, documents relating to this request Halo will produce documents to Plaintiff upon execution of a confidentiality agreement.

DATED: July 3, 2012

Respectfully submitted,



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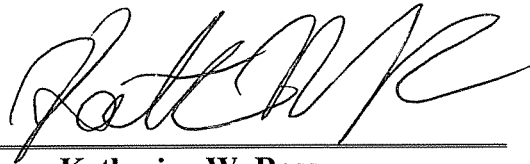
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Objections and Responses to AT&T Kentucky's Data Requests* was served via certified mail, return receipt requested, on the following counsel on this the 3rd day of July, 2012.

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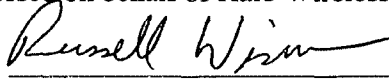


Katherine W. Ross

VERIFICATION

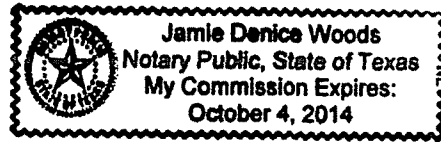
STATE OF TEXAS §
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COUNTY OF Denton §

BEFORE ME, the undersigned authority, personally appeared Russ Wiseman, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that he is the President and Chief Operating Office of Halo Wireless, Inc., that he is authorized to execute this verification, that he has read the foregoing answers to interrogatories and that the statements therein contained are within his personal knowledge and are true and correct to the best of his information and belief, and that he has executed the same for the purposes and consideration therein expressed on behalf of Halo Wireless, Inc..



RUSSELL WISEMAN

SUBSCRIBED and SWORN TO before me, on this the 29th day of June, 2012.



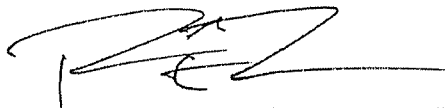
NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Commission Expires: October 4, 2014

VERIFICATION

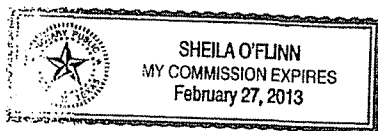
STATE OF TEXAS §
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COUNTY OF TARRANT §

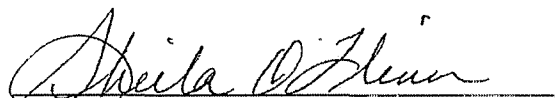
BEFORE ME, the undersigned authority, personally appeared Robert Johnson, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that he is the President of Ameliowave, Inc., who is the consulting and software development practice that is under contract with Transcom Enhanced Services, Inc. (“Transcom”) to provide support for managing existing products, developing new products, and architecting the platform and systems that support all products, that he is authorized to execute this verification, that he has read the foregoing answers to interrogatories 10-14 and that the statements therein contained are within his personal knowledge and are true and correct to the best of his information and belief, and that he has executed the same for the purposes and consideration therein expressed.



ROBERT JOHNSON

SUBSCRIBED and SWORN TO before me, on this the 2 day of July, 2012.





NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Commission Expires: 2-27-2013