

BIG RIVER TELEPHONE COMPANY, LLC'S

EXHIBIT NO. 11

AT&T MISSOURI'S RESPONSE TO INTERROGATORY 13

**AT&T MISSOURI'S OBJECTIONS AND RESPONSES TO BIG RIVER'S FIRST SET
OF DOCUMENT REQUESTS, INTERROGATORIES, AND REQUESTS FOR
ADMISSION**

Interrogatories

13. In regard to "regulatory and witnessing support" as referred to by Mr. Greenlaw, please provide:

- a) a detailed job description for those engaged in regulatory and witnessing support for AT&T Services, Inc.;
- b) a description of the qualifications for an individual to be engaged in regulatory and witnessing support for AT&T Services, Inc.;
- c) a description of the training provided to individuals engaged in witnessing support for AT&T Services, Inc.; and
- d) the name, job title, and business address of the individual who supervises witnessing support for AT&T Services, Inc.

Objection: AT&T Missouri objects to this request on the grounds that it seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving its objections, AT&T Missouri provides the following response.

Answer:

- a) This position testifies in proceedings conducted before regulatory bodies and/or courts on wholesale policy issues arising from the federal Telecommunications Act of 1996. Researches and compiles information obtained through regulatory contacts. Summarizes regulatory issues for management. Monitors regulatory proceedings and complaint pleadings. Assists in recommending company response to regulatory issues. Assists in the development of company position on regulatory issues. Monitors state and federal regulatory and legislative developments to identify issues affecting company's operations and plans.
- b) Qualifications include:
 - Solid understanding of FTA '96, Sections 251, 252 and 271, as well as FCC regulations implementing the FTA.
 - Excellent communication skills (written and oral)
 - Communication, influencing and negotiating skills; issue resolution

- Strong presentation skills
 - Strong in building relationships and able to communicate at all levels
 - Ability to manage and prioritize multiple projects.
- c) Individuals are hired into this position because of their previous job training and expertise. Training is provided for new witnesses in preparation for their participation in general commission proceedings.
- d) No one individual supervises witness support for AT&T Services, Inc. Witnesses are provided from various business units within AT&T.