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October 15, 2010

Via Hand Delivery

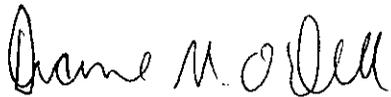
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Core Communications, Inc. v. AT&T Communications of Pa., LLC and TCG Pittsburgh, Inc., Docket Nos. C-2009-2108186 and C-2009-2108239

Dear Secretary Chiavetta:

On behalf of Core Communications, Inc., ("Core") enclosed please find an original and three copies of its Objections to AT&T's Interrogatories, Set VI with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely yours,



Deanne M. O'Dell, Esq.

DMO/lww

Enclosure

cc: Hon. Angela Jones, w/enc.
Cert. of Service, w/enc.

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burdensome, vague, oppressive and seeks information that is not relevant nor reasonably calculated to lead to the discovery relevant information.

Core objects to any of the Interrogatories and Requests for Documents that seek documents initially created by parties not affiliated with Core or who were not acting at the direction or on its behalf (e.g. news articles, investment analysts reports, agency or court filings by other parties) on the grounds that the request is overly broad, unduly burdensome and seeks information that is not relevant nor reasonably calculated to lead to the discovery of relevant information and on the ground that the information is equally available from other sources.

SPECIFIC OBJECTIONS

OBJECTIONS OF CORE TO INTERROGATORIES OF AT&T COMMUNICATIONS OF PA, LLC, SET VI IN DOCKET NOS. C-2009-2108186 AND C-2009-2108239

AT&T-Core-6-2: For each month from November 2009 to the present, provide: (1) the total number of minutes Core alleges AT&T terminated with Core, and (2) the total dollar amount Core alleges AT&T owes for call termination services.

- (a) For each month, list separately how much of the minutes and dollar amounts are for ISP-bound traffic versus VoIP traffic.
- (b) For each month, list separately how much of the minutes and dollar amounts are for local traffic versus non-local traffic.

OBJECTION: Core objects to subpart (a) of this question on the basis that it falls outside the scope of permissible discovery and is not relevant to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

AT&T-Core-6-3: Provide the number of customers Core serves in Pennsylvania as of October 2010.

- (a) How many customers are ISP customers?
- (b) How many customers are VoIP customers?

OBJECTION: Core objects to subpart (a) and subpart (b) of this question on the basis that they fall outside the scope of permissible discovery and are not relevant to the subject matter involved in this proceeding nor are they reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). Subject to and without waiver of its objection, Core will provide a response.

REQUEST AT&T-Core-6-6: For any of the traffic in dispute in this case, did Core charge Verizon for the termination of such traffic?

- (a) If so, identify how much Core charged Verizon and the amounts Verizon paid.
- (b) If so, what percentage of the traffic in dispute in this case did Core charge to Verizon?
- (c) If not, for each year from 2004 to the present, explain how Core identified and separated out traffic that originated from a carrier other than Verizon.

OBJECTION: Core objects to this question on the basis that it falls outside the scope of permissible discovery and is not relevant to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

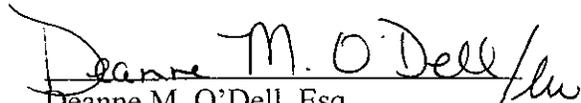
Subject to and without waiver of its objection, Core will provide a response.

AT&T-Core-6-7: For all of the traffic in dispute in this case, identify how many minutes constituted VNXX or FX traffic. If Core cannot identify the exact number of minutes that are VNXX or FX traffic, explain why not.

OBJECTION: Core objects to this question on the basis that it falls outside the scope of permissible discovery and is not relevant to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

Subject to and without waiver of its objection, Core will provide a response.

Respectfully submitted,



Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott
213 Market St., 8th Floor
Harrisburg, PA 17101
717.255.3744

Date: October 15, 2010

CERTIFICATE OF SERVICE

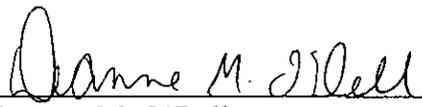
I hereby certify that this day I served a copy of Core Communications, Inc.'s
Objections to Set VI Interrogatories upon the persons listed below in the manner
indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and First Class Mail

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Dated: October 15, 2010



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