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April 20, 2011

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Complaint and Petition for Relief of BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South Carolina v. Image Access, Inc., d/b/a New Phone
Docket No. 2010-19-C

Dear Ms. Boyd:

Enclosed for filing is AT&T South Carolina's Response to NewPhone's Second Amended Answer/Counterclaim in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
917973

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re:

BellSouth Telecommunications, Incorporated d/b/a AT&T Southeast d/b/a AT&T South Carolina v. Image Access Incorporated d/b/a NewPhone	)	DOCKET NO. 2010-19-C

AT&T SOUTH CAROLINA'S RESPONSE TO NEWPHONE'S SECOND AMENDED ANSWER/COUNTER-CLAIM

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully submits this Response to the Second Amended Defenses, Answer, and Counter-Claim ("Second Amended Complaint") of Image Access, Inc. d/b/a/ NewPhone ("NewPhone") filed on March 31, 2010.

1. AT&T South Carolina denies Paragraph 12 of the Defenses as amended by Paragraph 1 of the Second Amended Complaint.

2. AT&T South Carolina otherwise reasserts and reiterates each and every statement set forth in its original and amended Responses/Answers.

3. AT&T South Carolina responds to the amended and restated Counter-Claim ("Amended Counter-Claim") as follows:

   1. AT&T South Carolina admits the allegations of Paragraph 1 of the Amended Counter-Claim.

   2. AT&T South Carolina admits that it and NewPhone are parties to the interconnection agreements identified in paragraphs 4 and 5 of AT&T South Carolina's Complaint and Petition for Relief and that those interconnection agreements say what

they say. AT&T South Carolina denies the remainder of the allegations of Paragraph 2 of the Amended Counter-Claim (including each sub-part).

3. AT&T South Carolina admits that the Telecommunications Act of 1996 and regulations promulgated thereunder say what they say. AT&T South Carolina denies the remainder of the allegations of Paragraph 3 of the Amended Counter-Claim (including each sub-part).

4. AT&T South Carolina denies the allegations of Paragraph 4 of the Amended Counter-Claim.

5. Absent discovery, AT&T South Carolina does not know if the allegations of Paragraph 5 of the Amended Counter-Claim are accurate with regard to each of the disputes addressed by the Amended Counter-Claim. AT&T South Carolina, therefore, denies these allegations.

6. AT&T South Carolina admits that is has offered certain promotional offerings to its retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 6 of the Amended Counter-Claim.

7. AT&T South Carolina admits that it has offered certain "cash back" promotions to its retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 7 of the Amended Counter-Claim.

8. AT&T South Carolina denies the allegations of Paragraph 8 of the Amended Counter-Claim.

9. AT&T South Carolina admits that Paragraph 12 of AT&T South Carolina's Complaint and Petition for Relief says what it says. AT&T South Carolina denies the remainder of the allegations of Paragraph 9 of the Amended Counter-Claim.

10. AT&T South Carolina admits that it has offered certain "line connection charge waiver (LCCW)" promotions to its retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 10 of the Amended Counter-Claim.

11. AT&T South Carolina admits that it has offered certain "secondary service charge waiver" promotions to its retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 11 of the Amended Counter-Claim.

12. AT&T South Carolina admits that it has offered certain "retention" promotions to retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 12 of the Amended Counter-Claim.

13. AT&T South Carolina admits that it has offered certain promotions to retail customers that apply to certain combinations of telecommunications and/or non-telecommunications services and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 13 of the Amended Counter-Claim.

14. AT&T South Carolina admits that it has offered certain blocking capability to retail customers and denies the remainder of the allegations of Paragraph 14 of the Amended Counter-Claim.

15. AT&T South Carolina denies the allegations of Paragraph 15 of the Amended Counter-Claim.

16. AT&T South Carolina admits that is has offered certain promotional offerings to its retail customers and that those promotional offerings speak for themselves. AT&T South Carolina denies the remainder of the allegations of Paragraph 16 of the Amended Counter-Claim.

17. AT&T South Carolina denies the allegations of Paragraph 17 of the Amended Counter-Claim.

18. AT&T South Carolina denies the allegations of Paragraph 18 of the Amended Counter-Claim.

19. AT&T South Carolina denies the allegations of Paragraph 19 of the Amended Counter-Claim.

20. AT&T South Carolina denies the allegations of Paragraph 20 of the Amended Counter-Claim.

21. AT&T South Carolina denies the allegations of Paragraph 21 of the Amended Counter-Claim.

22. AT&T South Carolina denies the allegations of Paragraph 22 of the Amended Counter-Claim.

23. AT&T South Carolina denies the allegations of Paragraph 23 of the Amended Counter-Claim (including each sub-part) and denies that NewPhone is entitled to any relief sought in Paragraph 23 of the Amended Counter-Claim (including each sub-part).

4. Other than as amended above, AT&T South Carolina reasserts and reiterates each and every statement set forth in its original and amended Responses/Answers.

Respectfully submitted this 20th day of April, 2011.

BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a AT&T SOUTHEAST d/b/a AT&T SOUTH CAROLINA

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STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Response to NewPhone's Second Amended Answer/Counterclaim in Docket No. 2010-19-C to be served upon the following on April 20, 2011:

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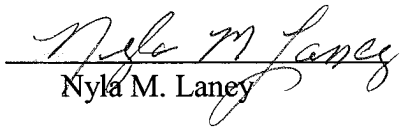

Nyla M. Laney

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