

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

C. MAXWELL BROWN, JR., M.D. )  
 )  
COMPLAINANT )  
 )  
v. ) CASE NO. 2004-00441  
 )  
BELLSOUTH TELECOMMUNICATIONS, INC. )  
 )  
DEFENDANT )

COMMISSION STAFF'S FIRST DATA REQUEST  
TO BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that BellSouth Telecommunications, Inc. ("BellSouth") file the original and 8 copies of the following information, with a copy to all parties of record.

Regarding BellSouth's Answer to the Complaint, page 2, paragraph 4, provide all information pertaining to marketing of the "Key Customer Program Subscriber Election" offer. Include scripts, training material, and any other documentation that BellSouth or its agents relied upon or were directed to rely upon while soliciting customers.

This information should be filed within 14 days of the date of this request. Include with your response the name of the person who is responsible for responding to questions relating to the information provided.



Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: February 28, 2005

cc: Parties of Record