COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF THE FEDERAL COMMUNICATIONS COMMISSION'S TRIENNIAL REVIEW ORDER REGARDING UNBUNDLING REQUIREMENTS FOR INDIVIDUAL NETWORK ELEMENTS	))))	CASE NO. 2003-00379

BELLSOUTH TELECOMMUNICATIONS, INC.'S
ADDITIONAL DISCOVERY TO ICG TELECOM GROUP, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby serves its Additional Discovery to ICG Telecom Group, Inc. ("ICG").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its subsidiaries, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to ICG.

3. "ICG" means ICG Telecom Group, Inc., its predecessors in interest, subsidiaries, present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of ICG.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of ICG including, but not limited to, correspondence, memoranda,

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drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

9. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

10. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

a) the full legal name of the person;

b) the name, title and employer of the person at the time in question;

c) the present or last known employer of such person;

d) the present or last known home and business addresses of the person; and

e) the present home address.

11. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

a) the full name of the person and any names under which it conducts business;

b) the present or last known address of the person; and

c) the present or last known telephone number of the person.

12. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

a) the type of document (e.g., letter, memorandum, etc.);

b) the date of the document;

c) the title or label of the document;

d) the Bates number or other identifier used to number the document for use in litigation;

e) the identity of the originator;

f) the identity of each person to whom it was sent;

g) the identity of each person to whom a copy or copies were sent;

h) a summary of the contents of the document;

i) the name and last known address of each person who presently has possession, custody or control of the document; and

j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

13. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

14. "ILEC" refers to Incumbent Local Exchange Carrier.

15. "CLEC" refers to Competing Local Exchange Carrier.

16. "Southeastern states" include the following states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

17. "Loop" refers to a transmission facility between a distribution frame (or its equivalent) and the loop demarcation point at an end-user customer premises. This definition is intended to include facilities between a switch, wire center, collocation, or point of interconnection and a customer's premises and is inclusive of both transmission facilities

between an incumbent LEC central office and transmission facilities between non-ILEC wire centers and switches.

18. "DS1" refers to Digital Signal, level 1.

19. "High capacity" refers to transmission and loop facilities with a total digital signal speed of DS1 or higher.

20. "CLLI code" refers to the Common Language Location Identifier that identifies a specific physical location or specific piece of equipment at a physical location.

GENERAL INSTRUCTIONS

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

a) the privilege asserted and its basis;

b) the nature of the information withheld; and

c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent ICG has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in Kentucky or any other state in proceedings in which BellSouth and ICG are parties, ICG need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

ADMISSONS AND INTERROGATORIES

1. Please admit that ICG has self-reported in CLONES (Central Location Online Entry System) database from Telecordia or to other third parties that it has deployed high capacity loop facilities to the following addresses:

2. If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial.

3. Please admit that ICG has deployed high capacity loop facilities to the following addresses:

4. If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial.

5. Please admit that ICG has deployed high capacity transport facilities to each of the central offices (identified by CLLI codes) listed below:

6. If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial.

7. Please admit that ICG can route or transport traffic using ICG's own facilities between any pair of central offices to which it has deployed high capacity transport facilities. This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as ICG's switch or the switch of another CLEC.

8. If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial.

9. For each high-capacity transport facility deployed by ICG in Kentucky, describe with particularity the nodes or termination points along each such facility route.

10. Please admit that ICG has fiber based collocation arrangements at the central offices (identified by CLLI code) listed below:

11. If ICG has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where the ICG installed its own inside wiring,

the percentage of buildings where the ICG is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where the ICG is using inside wiring owned by the building owner. In each of these situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings.

REQUESTS FOR PRODUCTION

1. Produce all documents identified in response to the foregoing Interrogatories.

Respectfully submitted, this 26th of January 2004.

DOROTHY J .CHAMBERS
601 W. Chestnut Street, Room 407
P. O. Box 32410
Louisville, KY 40203
(502) 582-8219

R. DOUGLAS LACKEY
ANDREW D. SHORE
MEREDITH E. MAYS
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0747

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.

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