COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

BELLSOUTH TELECOMMUNICATIONS, INC.'S
DATA REQUESTS TO PADUCAH POWER SYSTEM
FOR THE IMPAIRMENT OF LOCAL SWITCHING FOR MASS MARKET

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Commission's February 9, 2004 Order in this case, hereby serves its Data Requests to Paducah Power System ("Paducah Power"). If your response to both Data Request 1 and Data Request 3 is "none," you do not need to answer the remaining questions. Incorporated by reference are the Instructions and Definitions set out in BellSouth's discovery filed October 10, 2003 and November 24, 2003.

DATA REQUESTS

1. Identify each switch owned by Paducah Power that Paducah Power uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE:

2. For each switch identified in response to Data Request No. 1, please:

(a) provide the Common Language Location Identifier ("CLLI") code of the switch;

(b) provide the street address, including the city and state in which the switch is located;

(c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

(d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

(e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and

(f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

3. Identify any other switch not previously identified in Data Request No. 1 that Paducah Power uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Data Request, do not include ILEC switches used by Paducah Power either on an unbundled or resale basis.

RESPONSE:

4. For each switch identified in response to Data Request No. 3, please:

(a) identify the person that owns the switch;

(b) provide the Common Language Location Identifier ("CLLI") code of the switch;

(c) provide the street address, including the city and state in which the switch is located;

(d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

(e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;

(f) identify all documents referring or relating to the rates, terms, and conditions of Paducah Power's use of the switch; and

(g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Data Request No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

6. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Data Request 1.

RESPONSE:

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 6, separate the lines by end user and end user location in the following manner:

   (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;

   (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

   (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

   (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

   (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

(f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

(g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

(h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

(i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

(j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

(k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

(l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

(m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Data Request No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE:

9. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Data Request No. 3.

RESPONSE:

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 9, separate the lines by end user and end user location in the following manner:

(a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;

(b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

(c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

(d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

(e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

(f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

(g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

(h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

(i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

(j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

(k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

(l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

(m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

12. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE:

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 12, separate the lines by end user and end user location in the following manner:

    (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;

    (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

    (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

    (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

    (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

(f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

(g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

(h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

(i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

(j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

(k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

(l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

(m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Data Request is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

(a) Provide the Common Language Location Identifier ("CLLI") code of the switch;

(b) Provide the street address, including the city and state in which the switch is located;

(c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

(d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

(e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and

(f) Identify all documents referring or relating to the rates, terms, and conditions of Paducah Power's provision of switching capability.

RESPONSE:

The undersigned verifies that the above answers are correct based on information and belief.

_____
Signature

_____
Name

STATE OF _____)
)
COUNTY OF _____)

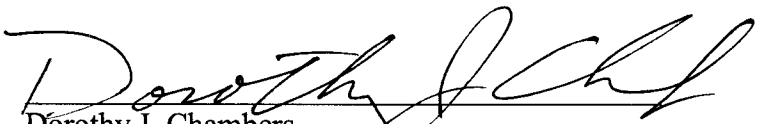
I, the undersigned, a Notary Public in and for the State and County aforesaid, do hereby certify that the foregoing document was presented before me by _____, who is personally known to me, and I further certify that he signed and acknowledged the same to be his true act and deed in due form of law.

WITNESS, my hand and official this the _____ day of _____, 2004.

_____
NOTARY PUBLIC

My Commission Expires:_____

Respectfully submitted,



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527516

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

BELLSOUTH TELECOMMUNICATIONS, INC.'S
DATA REQUESTS TO PADUCAH POWER SYSTEM
FOR IMPAIRMENT OF TRANSPORT AND DEDICATED LOOPS

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Commission's February 9, 2004 Order in this case, hereby serves its Data Requests to Paducah Power System ("Paducah Power"). If your response to Data Request 1, Data Request 2, and Data Request 3 is "none," you do not need to answer the remaining questions. Incorporated by reference are the Instructions and Definitions set out in BellSouth's discovery filed October 10, 2003 and November 24, 2003.

DATA REQUESTS

1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of central offices or wire centers in Kentucky for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if

you are self-providing such facilities For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

RESPONSE:

2. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in Kentucky. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access,

other unbundled network elements or other services obtained from third parties, should not be included in this response.

RESPONSE:

3. Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in Kentucky. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

RESPONSE:

4. For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)

b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.

c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).

d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.

e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)

f. Whether you are able to immediately provide transport along the particular route.

g. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE:

5. For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)

b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.

c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).

d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.

e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)

f. Whether you are willing and able immediately to provide transport along the particular route.

g. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE:

6. For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet[1] related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;

b. The name of the carrier or company from whom you received or purchased the transport;

c. Whether you are operationally ready to provide transport using these facilities; and

d. The capacity deployed and the capacity active on the route as of September 30, 2003.

RESPONSE:

7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are

[1] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

RESPONSE:

8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in Kentucky for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

RESPONSE:

9. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in Kentucky. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

RESPONSE:

10. Affirm or deny that you have obtained from a third party (other than the ILEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in Kentucky. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

RESPONSE:

11. Affirm or deny that you have obtained from a third party (other than the ILEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in Kentucky. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

RESPONSE:

12. If you answered in the affirmative to Question 8 and 10 (that you have self-provided or obtained from a third party other than the ILEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets)[2] identifying:

a. The RSAG valid address of each customer location.

b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)

c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.

d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).

e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.

f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

RESPONSE:

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[2] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

13. If you answered in the affirmative to Questions 9 and 11 (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets),[3] identifying:

a. The RSAG valid address of each customer location.

b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)

c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.

d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).

e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.

f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).

g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

RESPONSE:

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[3] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

The undersigned verifies that the above answers are correct based on information and belief.

_____
Signature

_____
Name

STATE OF _____)
)
COUNTY OF _____)

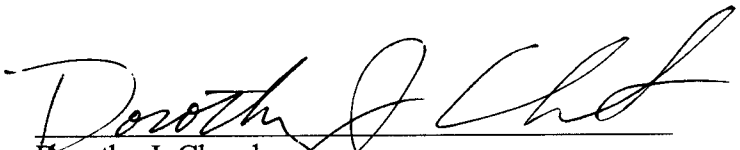
I, the undersigned, a Notary Public in and for the State and County aforesaid, do hereby certify that the foregoing document was presented before me by _____, who is personally known to me, and I further certify that he signed and acknowledged the same to be his true act and deed in due form of law.

WITNESS, my hand and official this the _____ day of _____, 2004.

_____
NOTARY PUBLIC

My Commission Expires:_____

Respectfully submitted,



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