

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER) CASE NO. 2003-00379
REGARDING UNBUNDLING REQUIREMENTS)
FOR INDIVIDUAL NETWORK ELEMENTS) FILED: March 4, 2004

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSES AND OBJECTIONS TO
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S
INTERROGATORIES (NOS. 120-124)**

Pursuant to the March 1, 2004 Order of the Kentucky Public Service Commission ("Commission"), BellSouth Telecommunications, Inc. ("BellSouth") hereby files the following Responses and Objections to AT&T Communications of the South Central States, LLC's ("AT&T") Interrogatories (Nos. 120-124), dated February 23, 2004.

SPECIFIC RESPONSES

REQUEST: Please indicate the number of "ported" residential telephone numbers to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5. Please provide this information in excel format, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

RESPONSE: BellSouth objects to Interrogatory 120, insofar as it seeks to impose an obligation on BellSouth that exceeds the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law. BellSouth will provide responsive documents in the manner specified by the Commission; but will not engage in electronic production that is not required by the Commission unless BellSouth and all other parties to this proceeding jointly agree to provide documents in electronic (excel) format. Subject to this objection and without waiving this objection, the information responsive to this Interrogatory is contained in the enclosed CD-ROM. This document contains confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided pursuant to the terms of the parties' Protective Agreement in response to the Commission's March 1, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery.

REQUEST: Please indicate the number of "extracted" business class loops to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5. Please provide this information in Microsoft Excel, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

RESPONSE: BellSouth objects to Interrogatory 121, insofar as it seeks to impose an obligation on BellSouth that exceeds the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law. BellSouth will provide responsive documents in the manner specified by the Commission; but will not engage in electronic production that is not required by the Commission unless BellSouth and all other parties to this proceeding jointly agree to provide documents in electronic (excel) format. Subject to this objection and without waiving this objection, the information responsive to this Interrogatory is contained in the enclosed CD-ROM. This document contains confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided pursuant to the terms of the parties' Protective Agreement in response to the Commission's March 1, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery.

REQUEST: Please provide in Microsoft Excel Format, for the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:

- a. 2-Wire UNE loops;
- b. 4-Wire UNE loops;
- c. DS1 UNE loops;
- d. DS3 UNE loops;
- e. DS0 EELs;
- f. DS1 EELs;
- g. DS3 EELs;
- h. T-1 Special Access lines; and
- i. DS3/T-3 Special Access lines

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5.

RESPONSE: BellSouth objects to Interrogatory 122, insofar as it seeks to impose an obligation on BellSouth that exceeds the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law. BellSouth will provide responsive documents in the manner specified by the Commission; but will not engage in electronic production that is not required by the Commission unless BellSouth and all other parties to this proceeding jointly agree to provide documents in electronic (excel) format. Subject to this objection and without waiving this objection, the information responsive to this Interrogatory is contained in the enclosed CD-ROM. These documents contain confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and are being provided pursuant to the terms of the parties' Protective Agreement in response to the Commission's March 1, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery.

REQUEST: Please provide all information "related to the actual deployment that exists in 7 of the 10 markets." Including at a minimum:

- a. The identity each of the switches claimed to be providing service to mass market customers, by owner, location and CLLI code;
- b. The number of mass market customers claimed to be served from each switch;
- c. The number of "ported" residential telephone numbers to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months;
- d. The number of "extracted" business class loop to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months;
- e. For the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:
 - i. 2W UNE loops;
 - ii. 4W UNE loops;
 - iii. DS1 UNE loops;
 - iv. DS3 UNE loops;
 - v. DS0 EELs;
 - vi. DS1 EELs;
 - vii. DS3 EELs;
 - viii. T-1 Special Access lines;
 - ix. DS3/T-3 Special Access lines;

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-7.

RESPONSE: BellSouth objects to Interrogatory 123, insofar as it seeks to impose an obligation on BellSouth that exceeds the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law. BellSouth will provide responsive documents in the manner specified by the Commission; but will not engage in electronic production that is not required by the Commission unless BellSouth and all other parties to this proceeding jointly agree to provide documents in electronic (excel) format. Subject to this objection and without waiving this objection, BellSouth states that Pamela Tipton's Direct Testimony in Kentucky does not discuss "the actual deployment that exists in 7 of the 10 markets." For purposes of this response,

RESPONSE (CONT'D):

BellSouth assumes that AT&T is referring to Pamela Tipton's Direct Testimony at page 16, lines 14 through 17 which states "With respect to the six geographic markets where the trigger is not met, but where BellSouth has concluded that CLECs are not impaired without access to BellSouth's unbundled switching, a CLEC is serving mass-market customers using its' own switch in one of those markets."

- a. With regard to the CLEC BellSouth has identified as having actual deployment in the market where the triggers are not met, BellSouth is providing a list of the switches this CLEC uses to provide qualifying service in Kentucky. The information responsive to this Interrogatory is contained in the enclosed CD-ROM. This document contains confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR § 64.2007 and is being provided pursuant to the terms of the parties' Protective Agreement in response to the Commission's March 1, 2004 Order Granting AT&T's Motion to Require BellSouth To Respond To Discovery.
- b. BellSouth did not request that CLECs provide the number of mass-market customers served by each CLEC switch. BellSouth has made a conservative assumption that the switches identified by CLECs as providing qualifying service in Kentucky serve the general geographic area within which the switch resides.
- c. Please see BellSouth's Response to AT&T's Interrogatory, Item No. 120.
- d. Please see BellSouth's Response to AT&T's Interrogatory, Item No. 121.
- e. Please see BellSouth's Response to AT&T's Interrogatory, Item No. 122.

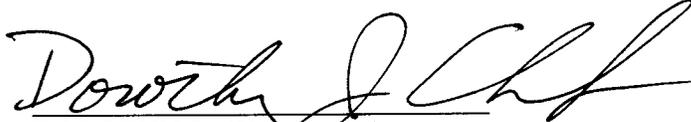
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REQUEST: Referring to the Direct Testimony of Pamela A. Tipton at page 7, lines 18 and 19, please provide a listing of the BellSouth wire centers in each of the 20 markets proposed.

RESPONSE: The information responsive to this Interrogatory is contained in the enclosed CD-ROM.

Respectfully submitted, this 4th of March, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Dorothy J. Chambers", written over a horizontal line.

DOROTHY J. CHAMBERS
601 W. Chestnut Street, Suite 407
P. O. Box 32410
Louisville, KY 40232
(502) 582-8219

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

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.