

**BellSouth Telecommunications, Inc.**

601 W. Chestnut Street  
Room 407  
Louisville, KY 40203

Mary.Keyer@BellSouth.com

**Mary K. Keyer**

General Counsel/Kentucky

502 582 8219  
Fax 502 582 1573

September 29, 2006

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

**RECEIVED**

SEP 29 2006

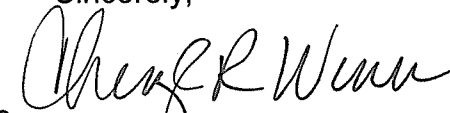
PUBLIC SERVICE  
COMMISSION

Re: Petition of SouthEast Telephone, Inc., for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection Under the Telecommunications Act of 1996 PSC 2006-00316

Dear Ms. O'Donnell:

Enclosed for filing are four (4) copies of BellSouth Telecommunications, Inc.'s Responses and Objections to SouthEast Telephone, Inc.'s First Set of Data Requests. In accordance with the Commission's Procedural Schedule, the Responses are emailed to SouthEast today.

Sincerely,

  
for Mary K. Keyer

cc: Parties of Record

651625

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 29 2006

PUBLIC SERVICE  
COMMISSION

In the Matter of:

PETITION OF SOUTHEAST TELEPHONE, INC., )  
FOR ARBITRATION OF CERTAIN TERMS AND )  
CONDITIONS OF PROPOSED AGREEMENT WITH )  
BELLSOUTH TELECOMMUNICATIONS, INC. )  
CONCERNING INTERCONNECTION UNDER THE )  
TELECOMMUNICATIONS ACT OF 1996 )

Case No. 2006-00316

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND**  
**OBJECTIONS TO SOUTHEAST TELEPHONE, INC.'S**  
**FIRST SET OF DATA REQUESTS**

Pursuant to 47 U.S.C. § 252(b)(3), BellSouth Telecommunications, Inc. ("BellSouth"), responds to the First Set of Data Requests filed by SouthEast Telephone, LLC ("Southeast") on September 15, 2006.

**GENERAL OBJECTIONS**

1. BellSouth objects to each data request to the extent that it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such data request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

2. BellSouth objects to each data request to the extent that it is intended to apply to matters other than Kentucky intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to each such data request as being irrelevant, overly

broad, unduly burdensome, and oppressive. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

3. BellSouth objects to each data request to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

4. BellSouth objects to each data request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this discovery. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each data request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

7. BellSouth objects to each data request to the extent that it seeks to impose obligations on BellSouth that exceed the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

8. BellSouth objects to each data request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

9. BellSouth objects to each data request to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

10. BellSouth is a large corporation with employees located in many different locations in Kentucky and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the data requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or

expense. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

Respectfully submitted,

*for Cheryl Winn*  
\_\_\_\_\_  
MARY K. KEYER  
601 W. Chestnut Street, Room 407  
P. O. Box 32410  
Louisville, KY 40232  
(502) 582-8219

ANDREW D. SHORE  
BellSouth Center – Suite 4300  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375  
(404) 335-0765

COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

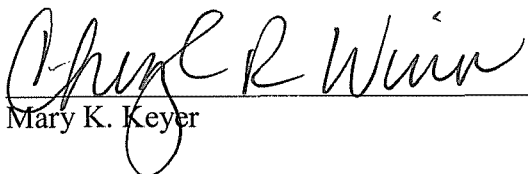
650193

**CERTIFICATE OF SERVICE KPSC 2006-00316**

It is hereby certified that a true and correct copy of BellSouth's Responses to SouthEast Telephone's First Set of data Requests to BellSouth was served on the following individuals via email this 29th day of September 2006.

Bethany Bowersock  
Liz Thacker  
SouthEast Telephone, Inc.  
106 Power Drive  
P. O. Box 1001  
Pikeville, KY 41502-1001  
[beth.bowersock@setel.com](mailto:beth.bowersock@setel.com)  
[liz.thacker@setel.com](mailto:liz.thacker@setel.com)

Hon. David L. Sieradzki  
Hogan & Hartson, L.L.P.  
555 Thirteenth Street, N.W.  
Washington, DC 20004-1109  
[dlsieradzki@hhlaw.com](mailto:dlsieradzki@hhlaw.com)

for   
Mary K. Keyer



REQUEST: Please provide, in electronic spreadsheet form, the monthly cost per line, by wire center, for each analog loop type (SL1, SL2, UCL, UNE-P, *etc.*) relied upon by the Kentucky PSC in setting final costs and rates in Administrative Case No. 382.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth's loop costs are not relevant. The Commission established cost-based UNE loop rates in Administrative Case No. 382. Every CLEC in Kentucky had the opportunity to participate in that cost proceeding, and many in fact litigated vigorously the UNE rates. The rates the Commission established in its cost proceeding are set forth in Attachment 2 to *every* BellSouth interconnection agreement in Kentucky. SouthEast was one of numerous CLECs that had the opportunity to litigate this issue at the same time as the entire industry during the Administrative Case No. 382 proceeding. There is no legitimate reason to allow SouthEast to unnecessarily and unilaterally decide to litigate the issue yet again. There has been no showing that the rates the Commission established in Administrative Case No. 382 are not appropriate. Indeed, to the contrary, the Commission (as well as the FCC in reviewing BellSouth's section 271 application) concluded that the UNE loop rates the Commission established are cost-based and proper. SouthEast is not entitled to special or unique UNE rates.

In addition, even if the establishment of a special UNE loop rate for SouthEast was appropriate, which it most certainly is not, SouthEast failed to raise the issue in a timely fashion. The 1996 Act requires that before a party may petition a state commission for arbitration of an issue, the party must first attempt to negotiate in good faith the resolution of the issue. SouthEast failed to do so here. Notwithstanding the fact the parties had been negotiating terms of a new interconnection agreement for several months, SouthEast did not raise the issue of desiring special SouthEast loop rate until right before it filed its petition for arbitration. Such conduct does not satisfy the good faith negotiation standard.





REQUEST: Please provide, in electronic spreadsheet form, the number of switched access lines, by wire center, used by the Kentucky PSC in Administrative Case No. 382 to establish the weighted average cost of analog loops by UNE zone (as referenced in the preceding data request). Identify the vintage of the data.

RESPONSE: See response to data request no. 1.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 3  
Page 1 of 1

REQUEST: Please provide, in electronic spreadsheet form, the number of switched access lines (calculated using an identical definition as used in answer to the preceding data request) by wire center as of December 31, 2005.

RESPONSE: See response to data request no. 1.



REQUEST: Provide, in electronic spreadsheet form, the number of UNE-P lines, separately for residential and business customers, by wire center, as of the end of each year, 2001 through 2005.

RESPONSE: See response to data request no. 1. BellSouth further objects to this request to the extent it seeks confidential and proprietary and/or competitively sensitive business information. In addition, there is no longer an obligation for ILECs to provide UNE-P, and discovery seeking information regarding UNE-P is patently unreasonable.



**REQUEST:** Provide, in electronic spreadsheet form, the number of lines provided by BellSouth under a DS0 commercial agreement, separately for residential and business customers, by wire center, as of the end of 2004 and 2005.

**RESPONSE:** BellSouth objects to this request on the grounds that it seeks information that is not relevant to the issues in this arbitration. This is an arbitration pursuant to section 252 of the 1996 Act to address obligations arising under section 251 of the Act. There is no question that BellSouth does not have a section 251 obligation to provide a "DS0" service. Accordingly, DS0 commercial agreements have no relevance to this arbitration. BellSouth further objects on the grounds that the information sought is confidential and competitively sensitive business information.





REQUEST: Provide a copy of any and all documents, studies, analyses, consultants' reports, memoranda, back-up data, and any other material or information that BellSouth created, sponsored (in whole or in part), used or relied on to determine any of the rates it has proposed to Southeast Telephone or to any other CLEC for access to unbundled local switching and all other non-loop elements and functionalities of the Platform, since January 1, 2005. Without identifying the names of carriers other than SouthEast, please identify the specific rates that BellSouth proposed, and/or that a CLEC agreed to pay or is actually paying, for unbundled local switching and all other such elements and functionalities.

RESPONSE: See response to data request no. 5.



REQUEST: Provide the net investment in central office switching account 2212.1 (Circuit Switching) for Kentucky at the end of 2005.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth's switching costs are not relevant. BellSouth is no longer required to provide switching as a UNE under section 251. Consequently, the rates and terms related to BellSouth's provision of switching are not subject to section 252 arbitration.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 8  
Page 1 of 1

REQUEST: Provide that portion of the annual depreciation expense reported in ARMIS 43-03 Row 6560 associated with central office switching account 2212.1 for Kentucky in 2005.

RESPONSE: See response to data request no. 7.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 9  
Page 1 of 1

REQUEST: For each year, 2000 through 2005, please provide the average monthly minutes of use per BellSouth switched access line in Kentucky, separately identified for local, originating interstate access, terminating interstate access, originating intrastate access, terminating intrastate access, and originating ISP-bound traffic.

RESPONSE: See response to data request no. 7.





BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 10  
Page 1 of 1

REQUEST: For each year, 2000 through 2005, please provide the average monthly minutes of use per BellSouth UNE-P line in Kentucky, separately identified for each of the categories set forth in the preceding data request.

RESPONSE: See response to data request nos. 4 and 7.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 11  
Page 1 of 1

REQUEST: Provide the annual revenue received by BellSouth in 2004 and 2005 from the following UNE End Office Switching rate elements: (a) End Office Switching Function; and (b) End Office Trunk Port-Shared.

RESPONSE: See response to data request no. 7.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 12  
Page 1 of 1

REQUEST: Provide the total number of billed minutes in 2004 and 2005 for the following UNE End Office Switching rate elements: (a) End Office Switching Function; and (b) End Office Trunk Port-Shared.

RESPONSE: See response to request no. 7.



REQUEST: Explain with specificity the basis for each and every difference between the costs that are intended to be recovered through the Remote Site Adjacent Collocation Application Fee (\$755.62) and the Adjacent Collocation Application Fee (\$3,165.50) identified in Exhibit B to Attachment 4 (the rate schedule in the collocation section) of the most recent proposed Interconnection Agreement that BellSouth proffered to SouthEast. Please provide all documents, including but not limited to cost studies or other analyses, justifying or supporting such cost differences. To the extent that the Commission addressed these fees in Administrative Case No. 382, provide all documents, including but not limited to cost studies or other analyses, justifying or supporting each of these fees.

RESPONSE: The Application Fee recovers the costs incurred in reviewing and processing a collocation application. Specifically, the Adjacent Collocation Application Fee recovers the costs associated with eight different work groups that review and respond to the details included on an Adjacent Collocation application. The Commission approved the Adjacent Collocation Application Fee (Element H.4.9) in Administrative Case No. 382. The work groups that review and respond to this application are:

- The customer contact group (Account Team & clerical support) that receives the application, verifies the accuracy of the inputs, communicates with the customer and internal groups, and prepares the written response to the customer's application.
- The Service Order group that performs work required to issue the service order.



RESPONSE: (Cont.)

- Six network and property management work groups that manage the central office space, equipment and building infrastructure (e.g., power capacity manager, circuit capacity manager, and corporate real estate). These work groups receive the application, ensure that power is available and can be provided safely, ensure that cable racking and support structure are available, ensure that building infrastructure and associated property will accommodate the arrangement, ensure that duct space is available for the facilities coming from the adjacent arrangement, and provide a coordinated response to the customer contact group.

The Remote Site Adjacent Collocation Application Fee recovers the cost associated with three different work groups that review and respond to the details included in a Remote Site Adjacent Collocation application. The Kentucky Commission did not address this item in Administrative Case No. 382. The work groups that review and respond to this application are:

- The customer contact group (Account Team) that receives the application, verifies the accuracy of the inputs, communicates with the customer and internal groups, and prepares the written response to the customer's application.
- The Service Order group that performs work required to issue the service order.
- The Outside Plant Engineering work group that receives the application, updates all manual records, assesses easement requirements, and responds to the application.

The basis for the difference in the costs is simply that an Adjacent Collocation arrangement at a central office is more complex and requires more work groups and work time than an Adjacent Collocation arrangement at a remote site. It should be noted that, subject to technical feasibility and space availability, BellSouth will permit an Adjacent Collocation arrangement on BellSouth central office property only when space within the requested BellSouth central office is legitimately

RESPONSE: (Cont.)

exhausted and where the adjacent arrangement does not interfere with access to existing or planned structures or facilities on the BellSouth property. An adjacent collocation arrangement would consist of a structure (e.g., a Hut or Controlled Environmental Vault) on the property.

The following supporting files are attached: H.4.9.xls, H.10.1.xls, KYADJPHC.xls, KYADJPHCRT.xls, and ADJ\_RT~1.ppt.

BellSouth Telecommunications, Inc.  
KY PSC Adm Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 13  
ATTACHMENT

	A	B	C	D	E	F	G	H	I	J
1	Kentucky									
2	Index Sheet									
3	Study Period: 2000-2002									
4										
5										
6										
7										
8										
9	<b>Sheet Name:      Description:</b>									
10	Index      Adjacent Physical Collocation									
11	Investments      CALCULATOR INPUT FORM - MATERIAL/INVESTMENT DATA									
12	Additives_Recurring      CALCULATOR INPUT FORM - RECURRING EXPENSES DATA									
13	Additives_Nonrecurring      CALCULATOR INPUT FORM - NONRECURRING EXPENSES DATA									
14	Recurring Labor      CALCULATOR INPUT FORM - RECURRING LABOR EXPENSES DATA									
15	Nonrecurring Labor      CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES									
16	INPUT_Investment      Adjacent Physical Collocation - Input Investments									
17	INPUT_Nonrecurring      Adjacent Physical Collocation - NRC Circuit Design worktimes									
18	wp H.4.3      Development of Investment for 2 Wire Cross Connects									
19	wp H.4.3 NRC      Development of Investment for NRC Circuit Design									
20	wp H.4.4      Development of Investment for 4 Wire Cross Connects									
21	wp H.4.5      Development of Investment for DS1 Cross Connects									
22	wp H.4.6      Development of Investment for DS3 Cross Connects									
23	wp H.4.7      Development of Investment for 2 Fiber Cross Connects									
24	wp H.4.8      Development of Investment for 4 Fiber Cross Connects									

	A	B	C	D	E	F	G	H
1		<b>CALCULATOR INPUT FORM - NONRECURRING EXPENSES DATA</b>						
2								
3		<b>Instructions:</b>						
4		<b>1. Use this worksheet to record nonrecurring non-labor expenses to be input into the TELRIC calculations.</b>						
5		<b>2. All amounts shown are per unit (e.g., per call, per loop, per MOU).</b>						
6		<b>3. Input data, by Cost Element, leaving no blank lines. On next row</b>						
7		<b>after last line of data, type END in Cost Element Column.</b>						
8		<b>4. All data on this form should be cell-referenced to study workpapers.</b>						
9		<b>5. Do NOT change columns, headings, sheet name.</b>						
10		<b>6. Use column D when cost element has a single nonrecurring cost; use columns E &amp; F for elements with a first</b>						
11		<b>and additional nonrecurring cost; use columns G &amp; H for elements with an initial and subsequent nonrecurring cost.</b>						
12								
13								
14			<b>Nonrecurring</b>		<b>Nonrecurring</b>	<b>Nonrecurring</b>	<b>Nonrecurring</b>	<b>Nonrecurring</b>
15		<b>Cost</b>	<b>Expense Description</b>	<b>Nonrecurring</b>	<b>First</b>	<b>Additional</b>	<b>Initial</b>	<b>Subsequent</b>
16	<b>State</b>	<b>Element #</b>	<b>(Limited to 25 characters)</b>	<b>\$ Amount</b>	<b>\$ Amount</b>	<b>\$ Amount</b>	<b>\$ Amount</b>	<b>\$ Amount</b>
17	KY	H.4.9	Corp. Real Estate Support (CRES)	\$1,013.000				
18		END						
19								
20								
21			Maximum 10 entries per Cost Element #					

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
1	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES														
2															
3	Instructions:														
4	1. Use this worksheet to record nonrecurring labor times to be input into the TELRIC calculations.														
5	2. All amounts shown are per unit (e.g., per call, per loop, per MOU).														
6	3. Input data, by Cost Element, leaving no blank lines. On next row														
7	after last line of data, type END in Cost Element Column.														
8	4. All data on this form should be cell-referenced to study workpapers.														
9	5. Do NOT change columns, headings, sheet name.														
10	6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, I, J, & K for elements with a first														
11	and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.														
12	7. Study midpoint date is set at 6/2001.														
13	8. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.														
14															
15	Study Mid-Point Date (Mos.)		Jun-01												
16															
17															
18	(For use w/ one NR)														
19	State	Cost Element #	Cost Element Life (Mo)	Labor Expense Description (Limited to 25 characters)	JFC Payband	Installation Time (Hours)	Disconnect Time (Hours)	First Installation Time (Hours)	First Disconnect Time (Hours)	Additional Installation Time (Hours)	Additional Disconnect Time (Hours)	Initial Installation Time (Hours)	Initial Disconnect Time (Hours)	Subsequent Installation Time (Hours)	Subsequent Disconnect Time (Hours)
20	KY	H.4.9	3	Service Inquiry	JG58	11.0000	0								
21	KY	H.4.9	3	Service Inquiry	WS10	1.0000	0								
22	KY	H.4.9	3	Service Inquiry	230X	0.5000	0.03								
23	KY	H.4.9	3	Service Inquiry	34XX	10.0000	0								
24	KY	H.4.9	3	Service Inquiry	34XX	1.0000	0								
25	KY	H.4.9	3	Service Inquiry	34XX	8.0000	0								
26	KY	H.4.9	3	Service Inquiry	32XX	3.0000	0								
27	KY	H.4.9	3	Service Inquiry	JG58	0.7500	0								
28	KY	H.4.9	3	Service Inquiry	JG55	0.1250	0								
29	KY	H.4.9	3	Service Inquiry	34XX	5.0000	0								
30	KY	H.4.9	3	Service Inquiry	34XX	5.0000	0								
31	END														
32	Maximum of 25 entries per Cost Element #														
33															
34															
35															
36															

A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Kentucky												
2	Adjacent Physical Collocation - NRC Circuit Design worktimes												
3	Study Period: 2000-2002												
4													
5													
6													
7	Cost Element #	Description	Workgroup	Source	JFC								
8													
9	KY	Adjacent Collocation - Application Cost											
10		Service Inquiry	Account Team	Interconnection Operations	JG58		11.0000	0.0000					
11		Service Inquiry	Account Team Clerical	Interconnection Operations	WS10		1.0000	0.0000					
12		Service Inquiry	Customer Point of Contact	Interconnection Operations	230X		0.5000	0.0300					
13		Service Inquiry	Interexchange Network Access Coord (NIAC)	Interconnection Operations	34XX		10.0000	0.0000					
14		Service Inquiry	Power Capacity Management (PCM)	Network Planning & Support	34XX		1.0000	0.0000					
15		Service Inquiry	Circuit Capacity Management (CCM)	Network Planning & Support	34XX		8.0000	0.0000					
16		Service Inquiry	Outside Plant Engineering (OSPE)	Network Planning & Support	32XX		3.0000	0.0000					
17		Service Inquiry	Corp. Real Estate Support (CRES)	Interconnection Operations	JG58		0.7500	0.0000					
18		Service Inquiry	Corp. Real Estate Support (CRES)	Interconnection Operations	JG55		0.1250	0.0000					
19		Service Inquiry	Common Systems Capacity Mgmt. (CSCM)	Interconnection Operations	34XX		5.0000	0.0000					
20		Service Inquiry											
21													\$ 1,013.00

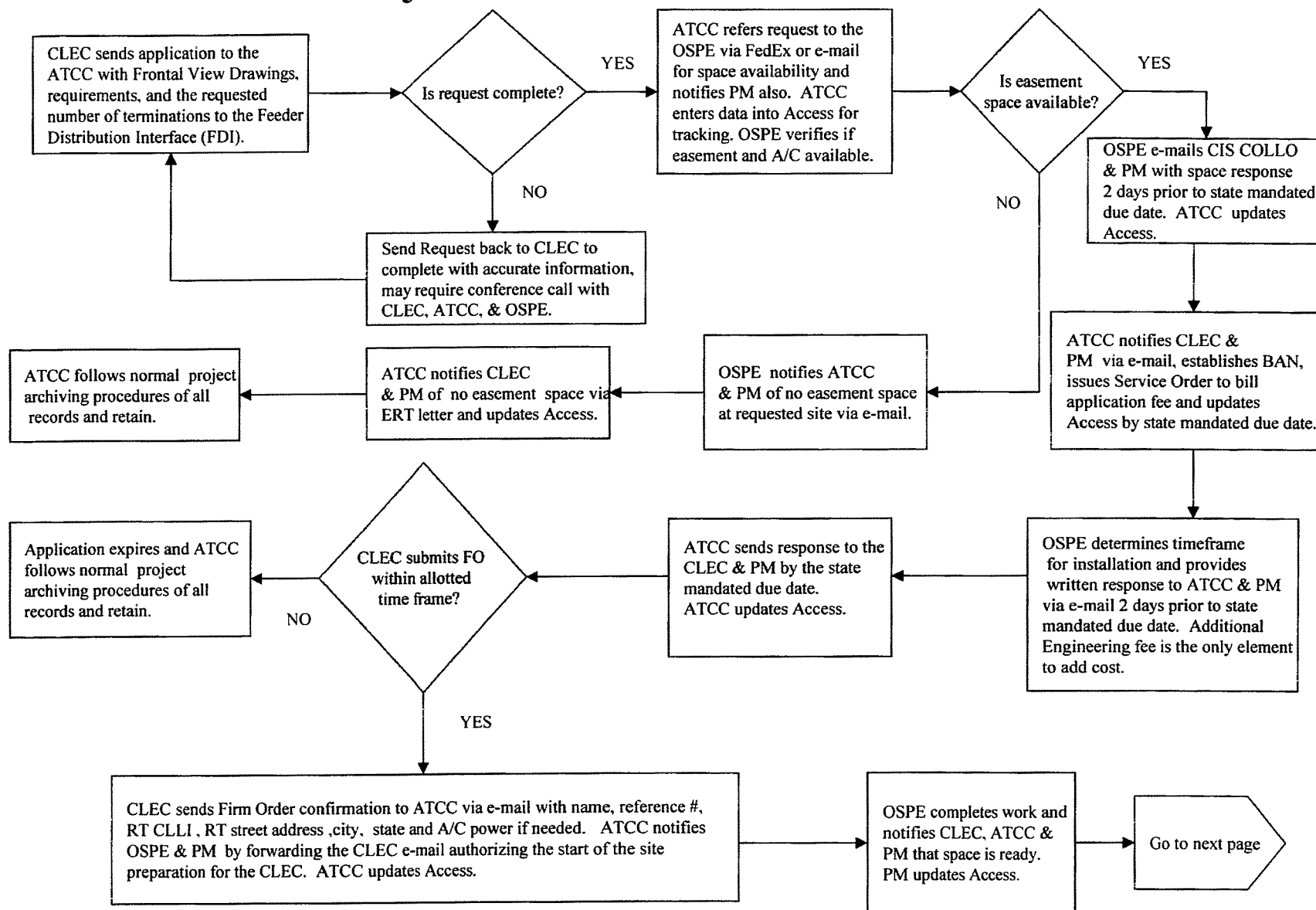
	A	B	C	D
1	Kentucky			
2	Index Sheet			
3	Study Period: 01/2002 - 12/2004			
4				
5				
6				
7				
8				
9		<b>Sheet Name:</b>	<b>Description:</b>	
10		index	Adjacent Collocation at the Remote Terminal (RT)	
11		Investments	CALCULATOR INPUT FORM - MATERIAL/INVESTMENT DATA	
12		Additives_Recurring	CALCULATOR INPUT FORM - RECURRING EXPENSES DATA	
13		Nonrecurring Labor	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES	
14		INPUTS_Nonrecurring	Adjacent Collocation at the Remote Terminal - NRC Circuit Design Worktimes	
15		INPUTS_Recurring	Adjacent Collocation at the Remote Terminal (RT)	
16		wp H.10.3		#REF!
17				
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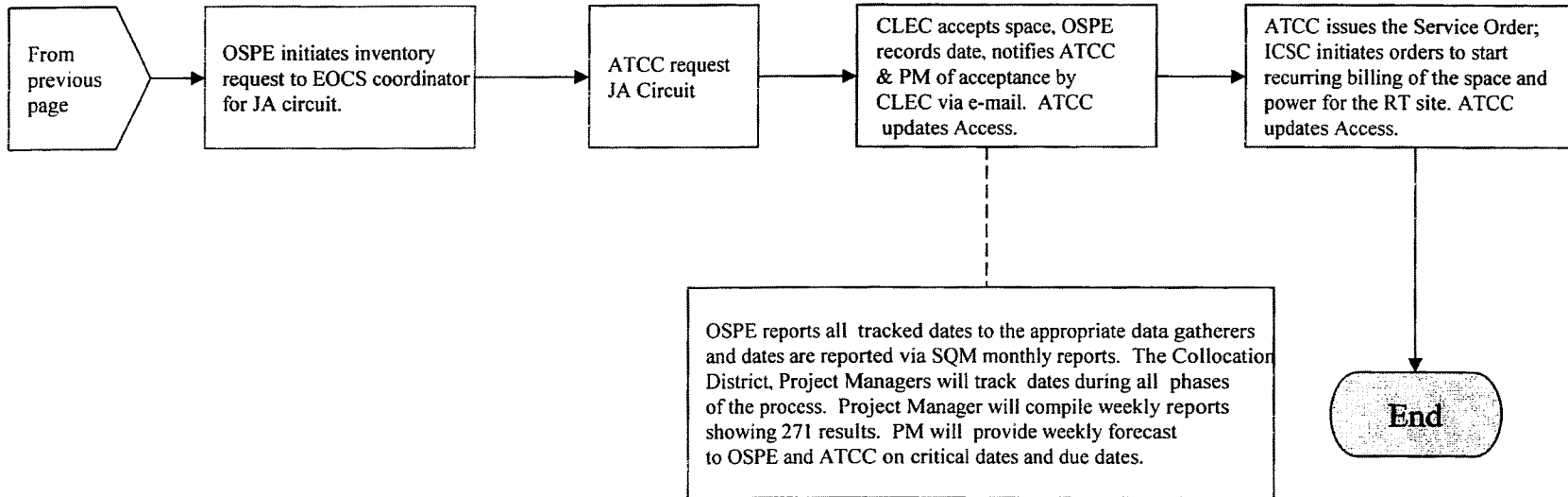
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	CALCULATOR INPUT FORM - NONRECURRING LABOR TIMES													
2	Instructions:													
3	1. Use this worksheet to record nonrecurring labor times to be input into the TELRIC calculations.													
4	2. All amounts shown are per unit (e.g., per call, per loop, per MOU).													
5	3. Input data, by Cost Element, leaving no blank lines. On next row													
6	after last line of data, type END in Cost Element Column.													
7	4. All data on this form should be self-referenced to study worksheets.													
8	5. Do NOT change columns, headings, sheet name.													
9	6. Use columns F & G when cost element has a single nonrecurring cost; use columns H, J, & K for elements with a first													
10	and additional nonrecurring cost; use columns L, M, N & O for elements with an initial and subsequent nonrecurring cost.													
11	7. Study midpoint date is set at 6/2003.													
12	8. Input Cost Element Life (in months) on first row of data for each cost element. It is not necessary to repeat on each line.													
13	Study Mid-Point Date (Mo.)													
14	Jun-03													
15														
16														
17														
18	Cost	(For use w/ one NR)												
19	State	Element #	Life (Mo)	Labor Expense Description	JFC	Installation	Disconnect	Time	(Hours)	First	Installation	Disconnect	Time	(Hours)
20	KY	H.10.1	60	(Limited to 25 characters)	Payband	230X	1,000	1,000	0.000	0.000	2.500	3.500	32XX	WS10
21	KY	H.10.1	60	Application Fee										
22	KY	H.10.1	60	Application Fee										
23	KY	H.10.1	60	Application Fee										
24	KY	H.10.1	60	Application Fee										
25	END													
26	Maximum of 25 entries per Cost Element #													
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1	Category										
2	Inputs for Nonrecurring Costs										
3	Study Period: 01/2002 - 12/2004										
4	KY										
5											
6	Item / Description	Cost Element	(For use w/ one NR)	Life (mos.)	Source						
7	Element	Install	Disconnect	Install	Disconnect	Install	Disconnect	First	Disconnect	Install	Disconnect
8											
9	H, 10	ADJACENT COLLOCATION AT THE REMOTE TERMINAL									
10											
11	H, 10, 1	Application Fee		60							
12		Service Order									
13		Process service order									
14											
15		Service Order									
16		Application Receipt & Review (3 hrs)									
17		Initial review of application & discussion with applicant									
18		Expansion of application contents & impact to overall project w/applicant									
19		Includes identification of application for interdepartmental coordinators									
20		Review of Remote Site Collocation Agreement (1 hr)									
21		Review of applicant's specific term, conditions & rates for RT collocation									
22		Clarification of agreement terms & conditions for evaluation of their impact specific to project									
23		Identification of impacting terms & conditions to interdepartmental coordinators (i.e. unique contract terms, etc)									
24		Processing of Application (3 hrs)									
25		Identify interdepartmental coordinators by name, etc/Assign reference number									
26		Request so issuance for establishing billing account number (BAN)									
27		Prepare distribution cover list & identify any critical concerns relating to application									
28		Assemble Application Package for distribution to interdepartmental coordinators									
29		Update master data base for corporate compliance reporting									
30											
31		Network Provisioning									
32		Review requirements on application, update all manual records									
33		Determine if assessment requirements are met.									
34		Respond to application.									
35		Network Provisioning									
36		Filing									
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# RT Adjacent Collocation Work Flow



# RT Adjacent Collocation Work Flow



**NOTE: LCSC will issue orders for the termination of the cable to the FDI binding posts for the unbundled sub-loops, as per the procedures established by the SI (Service Inquiry) for Sub-loop Unbundling. The two processes will flow independent of each other. The CLEC will be notified via the ERT Response Letter for RT Collocation of the requirement for their initiation of the SI for Sub-loop Unbundling terminations at the FDI.**

7/24/2001

### Installation Nonrecurring Cost Summary

#### Kentucky H.4.9 Adjacent Collocation - Application Cost

##### Nonrecurring Cost - Installation

<u>Description</u>	<u>Direct Cost</u>	<u>Shared Cost</u>	<u>TELRIC</u>
Nonrecurring Cost Development Reports	\$1,951.1400	\$0.0000	\$1,951.1400
OTHER EXPENSES:			
Corp. Real Estate Support (CRES)	<u>\$1,013.0000</u>	<u>\$0.0000</u>	<u>\$1,013.0000</u>
Total Cost	<u>\$2,964.1400</u>	<u>\$0.0000</u>	<u>\$2,964.1400</u>
Gross Receipts Tax Factor			X <u>1.0012546</u>
Cost (Including Gross Receipts Tax)			<u>\$2,967.8587</u>
Common Cost Factor			X <u>1.066929</u>
Economic Cost			<u>\$3,166.4946</u>

7/24/2001

**Disconnect Nonrecurring Cost Summary**

**Kentucky  
H.4.9 Adjacent Collocation - Application Cost**

	<b><u>Nonrecurring Cost - Disconnect</u></b>		
<b><u>Description</u></b>	<b><u>Direct Cost</u></b>	<b><u>Shared Cost</u></b>	<b><u>TELRIC</u></b>
Nonrecurring Cost Development Reports	\$0.9447	\$0.0000	\$0.9447
OTHER EXPENSES:			
Corp. Real Estate Support (CRES)	<u>\$0.0000</u>	<u>\$0.0000</u>	<u>\$0.0000</u>
Total Cost	<u>\$0.9447</u>	<u>\$0.0000</u>	<u>\$0.9447</u>
Gross Receipts Tax Factor			X 1.0012546
Cost (Including Gross Receipts Tax)			<u>\$0.9447</u>
Common Cost Factor			X 1.066929
Economic Cost			<u>\$1.0092</u>

7/24/2001

**Nonrecurring Cost Development - Direct Cost**

**Kentucky  
H.4.9 Adjacent Collocation - Application Cost**

			A	B	C	D=AxC	E=BxC	F	G=ExF
<b>Function</b>	<b>JFC/ Payband</b>	<b>JFC/Payband Description</b>	<b>Installation Worktime</b>	<b>Disconnect Worktime</b>	<b>Direct Labor Rate</b>	<b>Installation Cost</b>	<b>Disconnect Cost</b>	<b>Disconnect Discount Factor</b>	<b>Discounted Disconnect Cost</b>
Service Inquiry	JG58	Job Grade 58	11.0000	0.0000	\$47.0654549	\$517.7200	\$0.0000	1.0102	\$0.0000
Service Inquiry	WS10	Wage Scale 10	1.0000	0.0000	\$24.1422104	\$24.1422	\$0.0000	1.0102	\$0.0000
Service Inquiry	230X	Customer Point Of Contact - ICSC/LCSC	0.5000	0.0300	\$31.1718015	\$15.5859	\$0.9352	1.0102	\$0.9447
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	10.0000	0.0000	\$50.9798764	\$509.7988	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	1.0000	0.0000	\$50.9798764	\$50.9799	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	8.0000	0.0000	\$50.9798764	\$407.8390	\$0.0000	1.0102	\$0.0000
Service Inquiry	32XX	Outside Plant Eng (FG30)	3.0000	0.0000	\$43.6606378	\$130.9819	\$0.0000	1.0102	\$0.0000
Service Inquiry	JG58	Job Grade 58	0.7500	0.0000	\$47.0654549	\$35.2991	\$0.0000	1.0102	\$0.0000
Service Inquiry	JG55	Job Grade 55	0.1250	0.0000	\$31.1507714	\$3.8938	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	5.0000	0.0000	\$50.9798764	\$254.8994	\$0.0000	1.0102	\$0.0000
						<u>\$1,951.1400</u>			<u>\$0.9447</u>

7/24/2001

Nonrecurring Cost Development - TELRIC

Kentucky  
H.4.9 Adjacent Collocation - Application Cost

			A	B	C	D=AxC	E=BxC	F	G=ExF
<u>Function</u>	<u>JFC/ Payband</u>	<u>JFC/Payband Description</u>	<u>Installation Worktime</u>	<u>Disconnect Worktime</u>	<u>TELRIC Labor Rate</u>	<u>Installation Cost</u>	<u>Disconnect Cost</u>	<u>Disconnect Discount Factor</u>	<u>Discounted Disconnect Cost</u>
Service Inquiry	JG58	Job Grade 58	11.0000	0.0000	\$47.0654549	\$517.7200	\$0.0000	1.0102	\$0.0000
Service Inquiry	WS10	Wage Scale 10	1.0000	0.0000	\$24.1422104	\$24.1422	\$0.0000	1.0102	\$0.0000
Service Inquiry	230X	Customer Point Of Contact - ICSC/LCSC	0.5000	0.0300	\$31.1718015	\$15.5859	\$0.9352	1.0102	\$0.9447
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	10.0000	0.0000	\$50.9798764	\$509.7988	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	1.0000	0.0000	\$50.9798764	\$50.9799	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	8.0000	0.0000	\$50.9798764	\$407.8390	\$0.0000	1.0102	\$0.0000
Service Inquiry	32XX	Outside Plant Eng (FG30)	3.0000	0.0000	\$43.6606378	\$130.9819	\$0.0000	1.0102	\$0.0000
Service Inquiry	JG58	Job Grade 58	0.7500	0.0000	\$47.0654549	\$35.2991	\$0.0000	1.0102	\$0.0000
Service Inquiry	JG55	Job Grade 55	0.1250	0.0000	\$31.1507714	\$3.8938	\$0.0000	1.0102	\$0.0000
Service Inquiry	34XX	Ntwk & Eng Planning (FG20)	5.0000	0.0000	\$50.9798764	\$254.8994	\$0.0000	1.0102	\$0.0000
						<u>\$1,951.1400</u>			<u>\$0.9447</u>



11/7/2001

### Installation Nonrecurring Cost Summary

#### Kentucky H.10.1 Application Fee

<u>Description</u>	<u>Nonrecurring Cost - Installation</u>		
	<u>Direct Cost</u>	<u>Shared Cost</u>	<u>TELRIC</u>
Nonrecurring Cost Development Reports	\$516.62	\$0.00	\$516.62
OTHER EXPENSES:			
Total Cost	<u>\$516.62</u>	<u>\$0.00</u>	<u>\$516.62</u>
Gross Receipts Tax Factor			X <u>1.0018376</u>
Cost (Including Gross Receipts Tax)			<u>\$517.57</u>
Common Cost Factor			X <u>1.063588</u>
Economic Cost			<u>\$550.49</u>

Disconnect Nonrecurring Cost Summary

Kentucky  
H.10.1 Application Fee

Nonrecurring Cost - Disconnect

<u>Description</u>	<u>Direct Cost</u>	<u>Shared Cost</u>	<u>TELRIC</u>
Nonrecurring Cost Development Reports	\$195.31	\$0.00	\$195.31
OTHER EXPENSES:			
Total Cost	<u>\$195.31</u>	<u>\$0.00</u>	<u>\$195.31</u>
Gross Receipts Tax Factor		X	<u>1.0018376</u>
Cost (Including Gross Receipts Tax)			<u>\$195.31</u>
Common Cost Factor		X	<u>1.063588</u>
Economic Cost			<u>\$208.11</u>

11/7/2001

Nonrecurring Cost Development - Direct Cost

Kentucky  
H.10.1 Application Fee

			A	B	C	D=AxC	E=BxC	F	G=ExF
<u>Function</u>	<u>JFC/ Payband</u>	<u>JFC/Payband Description</u>	<u>Installation Worktime</u>	<u>Disconnect Worktime</u>	<u>Direct Labor Rate</u>	<u>Installation Cost</u>	<u>Disconnect Cost</u>	<u>Disconnect Discount Factor</u>	<u>Discounted Disconnect Cost</u>
Application Fee	230X	Customer Point Of Contact - ICSC/LCSC	1.00	1.00	\$30.9591723	\$30.96	\$30.96	1.1837	\$36.65
Application Fee	JG58	Job Grade 58	7.00	0.00	\$46.5570375	\$325.90	\$0.00	1.1837	\$0.00
Application Fee	32XX	Outside Plant Eng (FG30)	3.50	2.50	\$43.9149375	\$153.70	\$109.79	1.1837	\$129.95
Application Fee	WS10	Wage Scale 10	0.25	1.00	\$24.2545888	\$6.06	\$24.25	1.1837	\$28.71
						<u>\$516.62</u>			<u>\$195.31</u>

11/7/2001

Nonrecurring Cost Development - TELRIC

Kentucky  
H.10.1 Application Fee

			A	B	C	D=AxC	E=BxC	F	G=ExF
<u>Function</u>	<u>JFC/ Payband</u>	<u>JFC/Payband Description</u>	<u>Installation Worktime</u>	<u>Disconnect Worktime</u>	<u>TELRIC Labor Rate</u>	<u>Installation Cost</u>	<u>Disconnect Cost</u>	<u>Disconnect Discount Factor</u>	<u>Discounted Disconnect Cost</u>
Application Fee	230X	Customer Point Of Contact - ICSC/LCSC	1.00	1.00	\$30.9591723	\$30.96	\$30.96	1.1837	\$36.65
Application Fee	JG58	Job Grade 58	7.00	0.00	\$46.5570375	\$325.90	\$0.00	1.1837	\$0.00
Application Fee	32XX	Outside Plant Eng (FG30)	3.50	2.50	\$43.9149375	\$153.70	\$109.79	1.1837	\$129.95
Application Fee	WS10	Wage Scale 10	0.25	1.00	\$24.2545888	\$6.06	\$24.25	1.1837	\$28.71
						<u>\$516.62</u>			<u>\$195.31</u>



REQUEST: Please indicate whether there are any rates that apply to an Adjacent Collocation that are not identified in Exhibit B to Attachment 4 (the rate schedule in the collocation section) of the most recent proposed Interconnection Agreement that BellSouth proffered to SouthEast. If so, please identify each and every rate element, indicating with specificity the costs such elements are intended to recover and the rate that applies. Please provide all documents, including but not limited to cost studies or other analyses, justifying or supporting such cost estimates.

RESPONSE: The rates identified in Exhibit B to Attachment 4 are the only known rates that BellSouth would charge for Adjacent Collocation. BellSouth has developed processes, procedures and rates based on what would be expected to implement such an arrangement. However, Adjacent Collocation is only required if a BellSouth central office reaches a space exhaust situation. BellSouth has never experienced a space exhaust situation in Kentucky.



REQUEST: What non-recurring and/or recurring costs would BellSouth incur in connection with enabling SouthEast to bring a 900 pair copper cable from its adjacent off-site collocation into a BellSouth central office and cross-connect such copper cable to BellSouth's UNE loops at the main distribution frame ("MDF")? Please provide all documents, including but not limited to cost studies or other analyses, justifying or supporting such cost estimates.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth is not required under section 251 of the 1996 to provide the services described.





REQUEST: Please provide an electronic version of the BellSouth Cost Calculator used to develop BellSouth's final version of proposed rates in Administrative Case No. 382. Please ensure that the version of the BellSouth Cost Calculator that is provided by BellSouth in response to this discovery request contains all supporting electronic files that will permit the user of the BellSouth Cost Calculator to modify the inputs to the BellSouth Cost Calculator and produce revised results. Specifically, please ensure that the version of the BellSouth Cost Calculator that is provided allows for the use of the Capital Cost Calculator within the BellSouth Cost Calculator including the ability to modify the inputs within the Capital Cost Calculator and having these revised inputs propagate through to the cost elements within the BellSouth Cost Calculator.

RESPONSE: See responses to request nos. 1 and 7. In addition, even if cost issues were appropriate for resolution in this arbitration, which they are not, BellSouth should not be required to produce its intellectual property. A party proposing cost-based rates would have the burden to develop or purchase tools necessary to compute such rates, rather than having the benefit of the significant resources another party devoted to developing such tools.



REQUEST: Please provide an electronic version of the BellSouth Telecommunications Loop Model ("BSTLM") used to develop BellSouth's final version of proposed rates in Administrative Case No. 382. Please ensure that the version of the BSTLM provided by BellSouth in response to this discovery request contains all supporting electronic files that will permit the user of the BSTLM to modify inputs to the BSTLM and produce revised results.

RESPONSE: See response to request no. 16.



REQUEST: Please provide an electronic version of Telcordia's Switching Cost Information System Model Office ("SCIS/MO") and Simplified Switching Tool© ("SST") used by BellSouth to develop BellSouth's final version of proposed rates in Administrative Case No. 382. Please ensure that the version of the SCIS/MO and SST provided by BellSouth in response to this discovery request contains all supporting electronic files that will permit the user of the SCIS/MO and SST to modify inputs to the SCIS/MO and SST and produce revised results.

RESPONSE: See response to request no. 16.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 19  
Page 1 of 1

REQUEST: Please provide all available documents regarding how to use the BellSouth Cost Calculator including any documents related to the modification of inputs to the BellSouth Cost Calculator.

RESPONSE: See response to request no. 16.





BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 20  
Page 1 of 1

REQUEST: Please provide all available documents regarding how to use the BSTLM including any documents related to the modification of inputs to the BSTLM.

RESPONSE: See response to request no. 16.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 21  
Page 1 of 1

REQUEST: Please provide all available documents regarding how to use the SCIS/MO and SST including any documents related to the modification of inputs to the SCIS/MO and SST.

RESPONSE: See response to request no. 16.



REQUEST: Please provide all testimony, including non-confidential and confidential testimony, including pre-filed testimony and transcripts of live testimony, and including any attachments, exhibits, or other documents associated with such testimony, filed or presented by BellSouth and its witnesses in Administrative Case No. 382.

RESPONSE: See responses to request nos. 1, 16-21. Subject to the foregoing objections, BellSouth states that any non-confidential testimony filed with the Commission is publicly available to SouthEast, as is any transcript of a Commission proceeding.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 23  
Page 1 of 1

REQUEST: Please provide all documents, including cost studies, work papers, and other analyses, justifying or supporting the geographic deaveraging of BellSouth's proposed rates in Administrative Case No. 382.

RESPONSE: See response to request No. 1.





REQUEST: Please provide an electronic version of the BellSouth Cost Calculator used to develop the final rates in Administrative Case No. 382. Please ensure that the version of the BellSouth Cost Calculator that is provided by BellSouth in response to this discovery request contains all supporting electronic files that will permit the user of the BellSouth Cost Calculator to modify the inputs to the BellSouth Cost Calculator and produce revised results. Specifically, please ensure that the version of the BellSouth Cost Calculator that is provided allows for the use of the Capital Cost Calculator within the BellSouth Cost Calculator including the ability to modify the inputs within the Capital Cost Calculator and having these revised inputs propagate through to the cost elements within the BellSouth Cost Calculator.

RESPONSE: See response to request no. 16.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 25  
Page 1 of 1

**REQUEST:** Please provide an electronic version of the BSTLM used to develop the final rates Administrative Case No. 382. Please ensure that the version of the BSTLM provided by BellSouth in response to this discovery request contains all supporting electronic files that will permit the user of the BSTLM to modify inputs to the BSTLM and produce revised results.

**RESPONSE:** See response to request no. 16.



REQUEST: Please provide documentation for each of the Material Costs (indicating BellSouth or manufacturer part or reference number) listed in the table below. Please include a description of each cost and/or material category used in the development of each Material Cost for each item listed below. Please produce all documents, including source data, considered, used, or relied on by BellSouth in Administrative Case No. 382 to develop or determine the "Material Cost" value for each item listed below. Also please identify the Material Cost for each item as found in BellSouth's final version of BSTLM for its proposed rates in Administrative Case No. 382.

<u>ITEM</u>
CO INVESTMENT ADDER
COMPOSITE FIBER < 6k Ft
COPPER CABLE 24 GAUGE
COPPER CABLE 26 GAUGE
DROP
DTBT MATERIAL
FDI TERMINALS
FIBER CABLE
INDOOR FDI TERMINAL PRIMITIVES
NID/NIU
COT FIBER TERMINATION
ONU 24 – CE (DLC/ONU-DLCRT CATEGORY)
ONU 24 – CHANNEL (DLC/ONU-DLCRT CATEGORY)
VENDOR "A" DLC – CE (DLC/ONU-DLCRT CATEGORY)
VENDOR "A" DLC – CHANNEL (DLC/ONU-DLCRT CATEGORY)
VENDOR "B" DLC – CE (DLC/ONU-DLCRT CATEGORY)
VENDOR "B" DLC – CHANNEL (DLC/ONU-DLCRT CATEGORY)
ONU 24 – CE (DLC/ONU-COT CATEGORY)
ONU 24 – CHANNEL (DLC/ONU-COT CATEGORY)
VENDOR "A" DLC – CE (DLC/ONU-COT CATEGORY)
VENDOR "A" DLC – CHANNEL (DLC/ONU-COT CATEGORY)
VENDOR "B" DLC – CE (DLC/ONU-COT CATEGORY)
VENDOR "B" DLC – CHANNEL (DLC/ONU-COT CATEGORY)
OC1 – SONET TERM (SONET TERMINALS – SONET RT CATEGORY)
OC12 – SONET TERM (SONET TERMINALS – SONET RT CATEGORY)
OC3 – SONET TERM (SONET TERMINALS – SONET RT CATEGORY)
OC48 – SONET TERM (SONET TERMINALS – SONET RT CATEGORY)
OC1 – SONET TERM (SONET TERMINALS – SONET COT CATEGORY)
OC12 – SONET TERM (SONET TERMINALS – SONET COT CATEGORY)
OC3 – SONET TERM (SONET TERMINALS – SONET COT CATEGORY)
OC48 – SONET TERM (SONET TERMINALS – SONET COT CATEGORY)
OC1 – SONET TERM (SONET TERMINALS – SONET CARDS CATEGORY)
OC12 – SONET TERM (SONET TERMINALS – SONET CARDS CATEGORY)
OC3 – SONET TERM (SONET TERMINALS – SONET CARDS CATEGORY)
OC48 – SONET TERM (SONET TERMINALS – SONET CARDS CATEGORY)

BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 26  
Page 2 of 2

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth's costs are not relevant.





REQUEST: For each of the items identified in the table in the preceding data request, please provide documents regarding each of the Material Costs that would exist at present for BellSouth. Please produce all documents, including source data, considered, used, or relied on by BellSouth in the development of each "Material Costs" value for each item identified in the table in the preceding data request.

RESPONSE: See response to request No. 26.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 28  
Page 1 of 1

REQUEST: Please provide all available documents, including detailed step-by-step instructions, on how to incorporate different line counts into the BSTLM model.

RESPONSE: See responses to request no. 16.



REQUEST: Please provide in electronic spreadsheet format BellSouth's total line counts by wire center for each service type in the BSTLM for year-end 2000, 2001, 2002, 2003, 2004, and 2005. If this data is not available by wire center, provide this information at the lowest level of aggregation possible.

RESPONSE: See responses to request nos. 1 and 16.



BellSouth Telecommunications, Inc.  
KY PSC Case No. 2006-00316  
SouthEast's 1<sup>st</sup> Data Request  
September 15, 2006  
Item No. 30  
Page 1 of 1

REQUEST: Produce all available documents, including source data, considered or relied on by BellSouth in the determination of the BellSouth's lines counts for year-end 2000, 2001, 2002, 2003, 2004 and 2005 for each service type contained in BSTLM as identified in the preceding data request.

RESPONSE: See response to request nos. 1 and 16.





**REQUEST:** For each wire center, please provide in electronic format the area (measured in square miles or some equivalent) comprised within the wire center's boundaries.

**RESPONSE:** BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration.



REQUEST: Please provide all digital loop carrier equipment contracts utilized for equipment purchased throughout BellSouth's territory (including but not limited to Kentucky) between the years of 2000 and 2006, including all price schedules associated with the particular contracts and all related documents. To the extent that price changes have occurred in contracts between BellSouth and its digital loop carrier equipment vendors, please provide all versions of the contracts during the 2000 to 2006 timeframe demonstrating these price changes and all related documents.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth further objects on the grounds that the request is overly broad and unduly burdensome.



REQUEST: Please indicate whether BellSouth has used the CA Turner Telephone Plant Index in adjusting costs for cost filings filed with the Commission or any other state commission within its operating territory. If not, please indicate whether any other alternative telephone plant index has been used and provide the name of this index.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration.



REQUEST: Please provide, for each new distribution area that BellSouth has built in Kentucky since Jan. 1, 1999, an electronic spreadsheet showing the number of working lines in each distribution area. The information provided in response to this request should identify, at a minimum, the year the distribution area was built, the wire center associated with the distribution area and the number of working lines associated with the distribution area.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration.





REQUEST: For each year from 1996 to the present, please provide the number of originating (i.e., minutes originating from a CLEC subscriber and terminating to a BellSouth subscriber) and terminating reciprocal compensation minutes in Kentucky.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. The Commission established reciprocal compensation rates in Administrative Case No. 382. Such rates are not an appropriate subject for this arbitration. BellSouth further objects to this request on the grounds that it is overly broad and responding to it would be unduly burdensome.



REQUEST: For each year from 1996 to the present, please provide the net revenues received by (or paid by) BellSouth to other CLECs for reciprocal compensation.

RESPONSE: See response to request no. 35. BellSouth further objects to providing confidential and proprietary financial information.



REQUEST: For each year from 1996 to the present, identify the number of CLECs with whom BellSouth has agreed to a "bill and keep" arrangement for reciprocal compensation.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth further objects on the grounds that the request is overly broad and responding to it would be unduly burdensome. Subject to the foregoing, BellSouth states that it does not keep a list or a tally of the information requested. All BellSouth Kentucky interconnection agreements are filed with the Kentucky Commission. A review of those agreements would be necessary in order to respond to this request. The agreements are publicly available to SouthEast, and SouthEast can review them to acquire the requested information, which is what BellSouth would have to do to answer this request if it were appropriate, which it is not.



REQUEST: For each year from 1996 to the present, identify the number of CLECs with whom BellSouth has an interconnection agreement with a 'price-based' compensation arrangement for reciprocal compensation.

RESPONSE: See response to request no. 37.





REQUEST: Provide each reciprocal compensation price that BellSouth currently pays CLECs under an interconnection agreement and indicate, to the extent that differing prices apply, the number of CLECs paying each rate.

RESPONSE: See response to request no. 37.



REQUEST: At the end of calendar year 2005, please identify each CLEC with whom BellSouth has an interconnection agreement in Kentucky that is compensated for reciprocal compensation as though the CLEC's local switch does not provide functions comparable to a tandem switch.

RESPONSE: See response to request no. 37.



REQUEST: Please identify each unregulated commercial agreement between BellSouth or any of its affiliated companies, on the one hand, and another party or parties, on the other, that (a) relates to a lease of real or personal property, or any ongoing service or services (other than telecommunications services or network elements) to be provided in Kentucky over a period of six months or longer; and (b) was renewed or novated, with or without modifications, between Jan. 1, 2005 and August 31, 2006. For each such agreement, please identify (i) whether BellSouth or another affiliated company is the party to such agreement; (ii) the industry or type of entity that is the other party such contract (without identifying or naming the specific parties); (iii) the nature of the lease or other service to which the contract related; (v) the original date on which the contract was set to expire; (v) the dates upon which the renewed, novated, or modified contract was signed and took effect; (vi) the dates during which negotiations regarding the renewed, novated, or modified contract occurred; and (vii) whether BellSouth and the other contract party utilized their pre-existing contract as the initial draft used in such negotiations.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth further objects on the grounds that the request is overly broad and responding to it would be unduly burdensome.



REQUEST: Please provide a list, broken down by wire center, identifying all remote terminals ("RTs"), feeder/distribution interfaces ("FDIs"), and other network points in BellSouth's service area in Kentucky at which local loop facilities are aggregated, excluding central offices and network interface devices ("NIDs") at single-tenant premises. For each such RT, FDI, or other network aggregation point, please quantify the amount of physical collocation space, if any, that is available for requesting carriers to place interconnecting network equipment.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth is not obligated under section 251 of the 1996 Act to provide the services SouthEast improperly seeks to interject into this arbitration.





REQUEST: Please identify the computer systems and databases used to store and/or update: (1) the address of each central office, remote terminal ("RT"), and fiber/distribution interface ("FDI") in BellSouth's service area in Kentucky, (2) the CLLI code, if any, identifying such facility, (3) the geographic area served by the facility; (4) the designation of which RTs or FDIs subtend a particular central office; and/or (5) the number, categories, and addresses of customers served by a particular central office, RT, or FDI. Please identify the software used to manipulate and update such computer systems and databases, the physical locations at which such data are stored, and the electronic and hard copy documents into which such information is exported, downloaded, or printed out annually or more frequently. Please provide all such documents produced since January 1, 2005.

RESPONSE: See response to request no. 42.



REQUEST: Please identify the computer systems and databases used to store and/or update: (1) the GPS coordinates for each central office, RT, and FDI in BellSouth's service area in Kentucky, and (2) the E911 network address for such facility. Please identify the software used to manipulate and update such computer systems and databases, the physical locations at which such data are stored, and the electronic and hard copy documents into which such information is exported, downloaded, or printed out annually or more frequently. Please provide all such documents produced since January 1, 2005.

RESPONSE: See response to request no. 42.



REQUEST: Please identify and quantify, with specificity, the time and materials costs required to export or download the data referred to in the preceding two data requests to a CD-ROM disk or disks. Provide all supporting documents, including cost studies, for these cost estimates.

RESPONSE: See response to request no. 42.



- REQUEST: Please produce an electronic spreadsheet that identifies, for each wire center in BellSouth's service area in Kentucky,
- a. the total forward-looking costs per voice-grade line for all elements, services, and functionalities included in UNE-P, that formed the basis of the Commission's cost determinations in Administrative Case No. 382;
  - b. the total costs per voice-grade line generated by the most recent version of the FCC's Synthesis Model ("SM") used to determine High-Cost Model ("HCM") universal service support;
  - c. the embedded cost per voice-grade line per month derived from BellSouth's accounting data as reported to ARMIS;
  - d. the monthly recurring rates per voice-grade line for the Platform, including loop and non-loop (port) components of the Platform, as proposed in the most recent draft interconnection agreement and draft commercial agreement that BellSouth proffered to SouthEast;
  - e. the monthly recurring flat rates per line charged for basic local exchange services provided to retail residential end-user customers;
  - f. the monthly recurring flat rates per line charged for basic local exchange services provided to retail single-line and multi-line business end-user customers;
  - g. the Subscriber Line Charges and all other monthly recurring surcharges per line that BellSouth receives, respectively, from residential, single-line business, and multi-line business end-user customers (excluding sales taxes, universal service contribution surcharges, and any other surcharges or fees that BellSouth passes through on a dollar-for-dollar basis to governmental authorities or governmentally authorized entities);
  - h. the monthly weighted-average revenue per line for vertical services provided, respectively, to residential, single-line business, and multi-line business end-user customers;

REQUEST: (Cont.)

- i. the monthly weighted-average revenue per line for interstate and intrastate access charges relating to local exchange services provided, respectively, to residential, single-line business, and multi-line business end-user customers;
- j. the monthly revenue per line disbursed from the federal High-Cost Model ("HCM") universal service fund; and
- k. the monthly revenue per line disbursed from the federal Interstate Access Support ("IAS") universal service fund.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth further objects on the grounds that the request is overly broad and seeks information that would be unduly burdensome for BellSouth to produce.





REQUEST: To the extent that BellSouth contends that SouthEast should pay the rate applicable to an entire unbundled loop, rather than the rate applicable only to the Unbundled Sub-Loop Distribution element, when SouthEast interconnects and deploys line splitting equipment at a remote terminal and utilizes only the portion of the BellSouth loop facility between the remote terminal and the customer premise, please provide a complete justification for this contention, including a narrative explanation, cost data, and any documents supporting or relating to this contention.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth is not obligated under section 251 of the 1996 Act to provide the services SouthEast improperly seeks to interject into this arbitration.



REQUEST: Please identify all quality of service quality measurements and performance metrics that BellSouth keeps track of, and all related or supporting documents, pertaining to the process of accepting service orders for maintenance and repair services for unbundled network elements, processing such orders, implementing such maintenance and repair requests, and all other UNE maintenance and repair service quality measurements and performance metrics, including but not limited to each of the Maintenance and Repair performance standards (Metric Nos. B.3.1 through B.3.5; SQM Nos. M&R-1 through M&R-5) identified on page C-3 and pages C-25 through C-28 of Appendix C to the FCC Memorandum Opinion and Order in *Joint Application by BellSouth Corp., et al., for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina*, WC Docket No. 02-150, FCC 02-260, 17 FCC Rcd 17595 (released Sept. 18, 2002). Please provide a narrative description of each such service quality measurement and performance metric and the benchmark or parity standards that are measured.

RESPONSE: BellSouth objects to this data request on the grounds that it seeks information that is not relevant to any proper issue in this arbitration. BellSouth further objects on the grounds that the request is overly broad and responding to it would be unduly burdensome. Subject to the foregoing, BellSouth states that its SQM/SEEMs plan is publicly available at the Commission and BellSouth files monthly reports regarding its performance under the plan.



REQUEST: With respect to each such service quality measurement and performance metric identified in response to the preceding data request, please provide, in electronic spreadsheet format, data for each month, and weighted average by calendar quarter, for all time periods from Jan. 1, 2005 through the present, relating to BellSouth's performance in Kentucky for (a) itself, its affiliates, or its retail customers; (b) CLECs in general; and (c) SouthEast in particular.

RESPONSE: See response to request no. 48.