

S T O L L | K E E N O N | & | P A R K | L L P

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C. KENT HATFIELD
502-568-5745
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August 9, 2004

Ms. Elizabeth O'Donnell
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

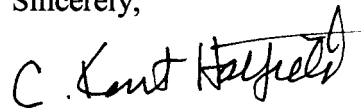
RECEIVED
AUG 10 2004
PUBLIC SERVICE
COMMISSION

RE: Case No. 2004-00234

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of AT&T Communications of the South Central States, Inc. First Set of Interrogatories to BellSouth Telecommunications, Inc. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me the enclosed, self-addressed stamped envelope.

Sincerely,



C. Kent Hatfield
Counsel for AT&T of the
South Central States, Inc.

CKH:jms

enc.

cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 10 2004

In the Matter of:

PUBLIC SERVICE
COMMISSION

PETITION BY AT&T COMMUNICATIONS)
OF THE SOUTH CENTRAL STATES, LLC)
AND TCG OHIO, INC. FOR ARBITRATION)
OF CERTAIN TERMS AND CONDITIONS)
OF A PROPOSED INTERCONNECTION)
AGREEMENT WITH BELL SOUTH)
TELECOMMUNICATIONS, INC. PURSUANT)
TO 47 U.S.C. SECTION 252)

CASE NO. 2004-00234

**AT&T'S FIRST SET OF INTERROGATORIES TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, LLC and TCG Ohio ("AT&T"), hereby serves its First Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. "Cost Study" or "Cost Studies" includes study summaries, work papers, study inputs and supporting documentation.

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

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

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

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

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

10. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

11. "'Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

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

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

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

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

14. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these

discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

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

- a) “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.
- b) “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.
- c) “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.
- d) “Access Line” refers to a working analog voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.
- e) Digital Loop Carrier (“DLC”) includes IDLC (integrated), UDLC (Universal) and NGDLC (Next Generation).
- f) “ILEC” refers to Incumbent Local Exchange Carrier.
- g) “CLLI code” refers to Common Language Location Identifier.
- h) “CO” refers to Central Office.
- i) “Coordinated cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch.
- j) “Coordinated time-specific cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

- k) “CWINS” refers to Customer Wholesale Interconnection Services.
- l) “DSO” refers to Digital Signal, level zero.
- m) “FCC” refers to the Federal Communications Commission.
- n) “LCSC” refers to Local Carrier Service Center.
- o) “LSR” refers to Local Service Request.
- p) “MDF” refers to Main Distribution Frame.
- q) “OSS” refers to Operational Support Systems.
- r) “PIC” refers to Primary Interexchange Carrier.
- s) “SEEM” refers to Self Effectuating Enforcement Mechanism.
- t) “UNE” refers to Unbundled Network Element.
- u) “UNE-L” refers to Unbundled Network Element-Loop.
- v) “UNE-P” refers to Unbundled Network Element –Platform.
- w) Unless otherwise stated, information requests refer to the states of North Carolina, Georgia, Kentucky, and Mississippi.
- x) “LIDB” refers to Line Information Database.
- y) “MSA” refers to Metropolitan Statistical Area.
- z) “LATA” refers to Local Access and Transport Area.

GENERAL INSTRUCTIONS

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

- a) the privilege asserted and its basis;

- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

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

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

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

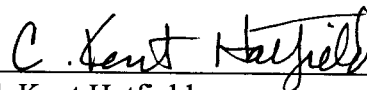
5. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

INTERROGATORIES

1. For each of the past 10 years, please identify that portion of the annual depreciation expense reported in ARMIS 43-03 Rows 6561 through 6565 (for each row separately; the column "Total Regulated") that is associated with investment reported in the following Rows of ARMIS 43-03 (Total Regulated Column). Please provide this information for each of the following states: Georgia, Kentucky, and Mississippi.

Row	Category
2211	Non-digital Switching
2212	Digital Electronic Switching
2210	Central Office Switching
2220	Operator Systems
2231	Radio Systems
2232	Circuit Equipment
2230	Central Office - Transmission
2411	Poles
2421	Aerial Cable
2422	Underground Cable
2423	Buried Cable
2424	Submarine and Deep Sea Cable
2426	Intrabuilding Network Cable
2431	Aerial Wire
2441	Conduit Systems
2410	Cable and Wire Facilities

Respectfully submitted,



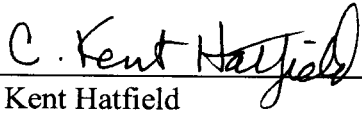
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COUNSEL FOR AT&T OF THE SOUTH CENTRAL STATES, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing, First Interrogatories to BellSouth Telecommunications, Inc filed on behalf of AT&T Communications of the Southern States, LLC, was served upon all parties of record this 9th day of August, 2004.



C. Kent Hatfield

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