HOGAN & HARTSON

September 15, 2006

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PUBLIC SERVICE
COMMISSION

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Mary K. Keyer
General Counsel/Kentucky
BellSouth Telecommunications, Inc.
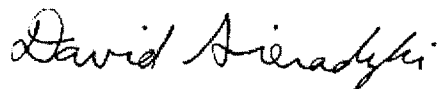601 W. Chestnut St., Room 407
Louisville, KY 40203

Re: *Petition of SouthEast Tel., 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

Dear Ms. Keyer:

Enclosed please find SouthEast Telephone, Inc.'s First Set of Data Requests to BellSouth Telecommunications, Inc. in the above-referenced proceeding. As you know, BellSouth's responses are due on Sept. 29, 2006.

Please contact me if you have any questions.

Very truly yours,

David L. Sieradzki
Counsel for SouthEast Telephone, Inc.

cc: Amy E. Dougherty
       Darrell Maynard

COMMONWEALTH OF KENTUCKY
BEFORE THE 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)	Case No. 2006-00316
Interconnection Under the Telecommunications Act of)	
1996)	

SOUTHEAST TELEPHONE INC. FIRST SET OF
DATA REQUESTS TO BELLSOUTH TELECOMMUNICATIONS, INC.

SouthEast Telephone, Inc. ("SouthEast") requests that BellSouth

Telecommunications, Inc. ("BellSouth") respond to the following data requests separately and

completely, by no later than September 29, 2006.

Instructions

SouthEast requests that BellSouth provide responses to these data requests in

electronic format, transmitted via e-mail and/or on clearly labeled CD-ROM disks that can be

read by personal computers using the Microsoft Windows operating system. Four identical

copies of each CD-ROM disk should be provided. The response to each request and subpart

should be provided in a separate electronic document or documents, with file names that identify

the request to which such document or documents respond. Narrative responses should be

provided in either Microsoft Word or Adobe Acrobat PDF format. The response to each request

and subpart calling for numerical data and/or spreadsheets should be provided in Microsoft Excel

format, and all cells should be "unlocked" so as to enable the user to review any formulas used to

derive data in the cells and to manipulate such data. Responses to requests that require

BellSouth to produce pre-existing documents should be provided in the native electronic file

- 1 -

format in which each such document was originally created. Include with each response the name and job title of the witness who will be responsible for responding to questions relating to the information provided.

Unless otherwise specified below, all requests relating to revenue data, cost data, usage, lines, wire centers, other network facilities, interconnection agreements, and commercial agreements pertain only to BellSouth's service area within the Commonwealth of Kentucky. To the extent a data request calls for information broken down by wire centers, such wire centers shall be identified at a minimum by CLLI code. All requests relating to Administrative Case No. 382 refer only to the portion of that Kentucky Public Service Commission proceeding pertaining to BellSouth (not the portions pertaining to other ILECs).

"Document" as used herein means any document, data, information, reports, studies, analyses, interoffice and intraoffice correspondence, e-mail messages, e-mail attachments, records, tables, charts, graphs, pictures, schedules, memoranda, notes, letters, booklets, circulars, bulletins, notices, instructions, minutes and other communications of any type, including all drafts and final versions, however produced or reproduced, stored in any media, including but not limited to hard copies, electronic copies, disks, CD-ROMs, and file back-ups.

If any document called for in these requests is withheld on the basis of a claim of privilege, please set forth the nature of the information with respect to which the privilege is claimed, together with the type of privilege claimed, a statement of all the circumstances on which BellSouth will rely to support such a claim of privilege, the date and topic of the document, and a list of those in the possession, custody or control of such document or copies thereof. If any document called for in these requests is withheld pursuant to an objection, state

the basis for the objection and produce those documents to which the objection does not apply. Without limiting the generality of the foregoing, if any such claim of privilege or objection applies only to a portion of any document called for in these requests, state the basis for the claim of privilege or objection and produce all other portions of such document as to which the claim of privilege or objection does not apply. If the data requested in any portion of these requests are unavailable, please provide the remaining available data responsive to the requests.

Definitions

- "Relate to," "refer to," "regarding," "with respect to," and "pertain to" mean supporting, evidencing, describing, mentioning, memorializing, constituting or referring to.

- "Or" shall be read as inclusively as possible, to include "or," "and," and "both."

- "Any" and "all" shall be read as inclusively as possible, to include "any," "all," and "every."

- "Act" means the Communications Act of 1934, as amended.

- "FCC" means the Federal Communications Commission.

- "Commission" means the Kentucky Public Service Commission.

- With the exception of terms specifically defined herein, all terms defined in the Act or in the FCC's rules, orders, and policies have the meaning defined therein. Terms not otherwise defined have the commonly understood meaning within the telecommunications industry.

- Unless otherwise specifically set forth below, all references to "lines," "switched access lines," "loops," UNE-P, and Platform mean those facilities and services operating at the voice-grade or DS0 level.

- "Platform" means an ILEC offering comprising the combination or commingling of voice-grade loop elements, local switching, transport, and related functionalities, that enable a CLEC or other requesting carrier to provide service to residential and/or business customers. The term "Platform" includes offerings pursuant to an interconnection agreement, commercial agreement, SGAT, tariff, or other arrangement; offerings pursuant to Sections 201, 202, 252, or 271 of the Act or other legal authority; and offerings identified as "UNE-P," "Wholesale Local Voice Platform," or other designations. "Platform" does not include resale offerings pursuant to Section 251(c)(4) of the Act.

Data Requests

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

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

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

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

21. 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.

22. 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.

23. 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.

24. 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.

25. 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.

26.　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.

ITEM
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)

27. 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.

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

29. 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.

30. 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.

31. 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.

32. 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.

33. 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.

34. 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.

35. 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.

36.   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.

37.   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.

38.   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.

39.   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.

40.   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.

41.   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.

42.   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.

43.   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.

44. 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.

45. 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.

46. 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;

     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.

47.   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.

48.   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.

49.   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.

* * * * *

Please contact the undersigned if you have any questions.

Very truly yours,

SOUTHEAST TELEPHONE, INC.

By: _____

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September 15, 2006