

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

COMPUTER INNOVATIONS)	
)	
COMPLAINANT)	
)	
vs.)	CASE NO. 2001-00068
)	
BELLSOUTH TELECOMMUNICATIONS, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF S DATA REQUEST

Pursuant to 807 KAR 5:001, BellSouth Telecommunications, Inc. (BellSouth) is requested to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 27, 2002.

1. BellSouth has asserted in this proceeding that its customer service agreements (CSAs) respond to specific competitive situations and specific locales and that the CSAs are filed with the Commission and are available for public inspection. (See letter from Dorothy J. Chambers dated September 14, 2001.) Describe criteria used by BellSouth to respond to specific competitive situations and specific locales. How is BellSouth made aware of the competitive situation and specifically how does BellSouth frame its response? Is there a percentage below the competitor s price that BellSouth offers?

2. By letter filed July 10, 2001, Computer Innovations asserts that it formed a competitive local exchange carrier (CLEC) as a second corporation and was prepared to begin offering services at the 15.54 percent reseller discount. However, at that time BellSouth initiated a program selling its products to regular retail customers at discounts of up to 22 percent. Is this an accurate statement? If so, how does BellSouth respond to the allegations that its retail division is targeting potential CLEC customers and undercutting its own wholesale division as alleged by Computer Innovations?

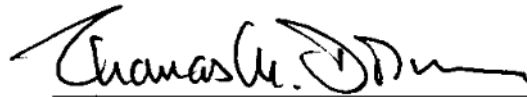
3. Has BellSouth offered Primary Rate Interface (PRI) service to Computer Innovations competitors for rates as low as 25 percent of the PRI rate offered to Computer Innovations? If so, why?

4. BellSouth offered a settlement to Computer Innovations by letter dated August 8, 2001. The offer was for the same pricing and terms as provided in BellSouth's contract with Hopkinsville Electric. Why was this particular CSA chosen as a settlement offer? Is there similarity of service between Computer Innovations and Hopkinsville Electric?

5. How does BellSouth respond to the allegations of Computer Innovations that BellSouth did not offer PRI service in Richmond, Kentucky even though it had the lines in place and, thereby, required Computer Innovations to obtain more expensive Basic Rate Interface lines?

6. Provide all criteria, such as terms and volume, upon which BellSouth formulates its competitive offerings. Put this information in a matrix for comparison of contracts on file at the Commission.

7. BellSouth's CSAs are available for public inspection. (The underlying cost information is not publicly disclosed.) Does BellSouth agree that it makes available any CSA to any similarly situated customer who agrees to the same terms and conditions?



Thomas M. Dorman
Executive Director
Public Service Commission
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DATED: August 7, 2002

cc: Parties of Record