

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DAWSON COX, JR.)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2003-00225
)	
BELLSOUTH TELECOMMUNICATIONS, INC.)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that BellSouth Telecommunications, Inc. (BellSouth) file the original and four copies of the following information within 20 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Refer to BellSouth s Answer at page 3, first full paragraph. Are 911 calls for all 105 customers located within Franklin County and served by the Stamping Ground exchange routed to Georgetown/Scott County emergency services? How are the 911 calls for the customers grandfathered to the Frankfort exchange routed?

2. Describe in detail the routing issues surrounding these 911 calls. Do both 911 systems provide enhanced call location information? Is the call location information electronically forwarded from the Georgetown/Scott County Public Service Answer Point (PSAP) to the Franklin County PSAP? Provide any other information that will assist Commission Staff in fully understanding the relationship between the two emergency systems and how calls are facilitated.

3. Refer to BellSouth s Answer at page 4, first full paragraph. Explain in detail the solution offered by BellSouth to Franklin County. When was this offer made and what was the response from Franklin County? What would be the additional non-recurring and recurring expense incurred by the Franklin County E-911 system to implement BellSouth s proposed solution? Identify the costs that would be experienced by BellSouth.

4. Refer to BellSouth s Answer at page 4, paragraph 7. Was the Bryant residence new or existing ? If existing, was the service originally grandfathered to the Frankfort exchange? Explain in detail how this error occurred and what changes to the facilities and/or routing were required to correct the Bryant s service to the Stamping Ground exchange. How were 911 calls to be routed before the change in service and how will they be routed now?

5. Describe in detail the changes necessary to move the Franklin County customers in the Stamping Ground exchange to the Frankfort exchange. Could this change be performed through Central Office routing adjustments only? If not, what additional outside plant modifications would have to be performed? Identify the costs and revenue impact associated with such a change.

6. Does the Local Access Transport Area (LATA) boundary affect BellSouth's ability to transfer customers' service from the Stamping Ground exchange to the Frankfort exchange? If yes, explain.

7. Compare the feasibility of installing additional 911 trunks to Franklin County versus transferring service of affected customers from the Stamping Ground exchange to the Frankfort exchange.

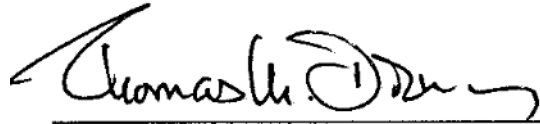
8. Provide any information that might indicate whether or not other customers in Franklin County served by the Stamping Ground exchange would oppose being transferred to the Frankfort exchange.

9. Explain any other solutions that might be considered for addressing the 911 issues involved with this case. Include an analysis of the costs experienced by PSAPs, BellSouth, and end-users.

10. At page 3, first full paragraph, BellSouth states that it is prohibited from carrying a call across the LATA boundary. On September 18, 2002, the Federal Communications Commission (FCC) granted BellSouth relief to provide in-region inter-LATA service. How does the FCC's decision still prohibit BellSouth from carrying a call across the LATA boundary?

11. Provide a detailed map of the exchange area showing locations of customers in relation to the LATA boundary, exchange boundary, and the county line.

12. Identify the optional calling plans that are available from BellSouth that would enable customers situated the same as Complainant to avoid toll charges when calling the rest of Franklin County.



Thomas M. Dorman
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

Dated: August 27, 2003

cc: Parties of Record

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