

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION CONCERNING THE PROPRIETY)
OF INTERLATA SERVICES BY BELLSOUTH) CASE NO.
TELECOMMUNICATIONS, INC. PURSUANT TO) 2001-105
THE TELECOMMUNICATIONS ACT OF 1996)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE TO THE COMMISSION STAFF'S
DATA REQUEST DATED FEBRUARY 25, 2002

REQUEST NO. 1

A narrative description by BellSouth of each of the five areas which it identified to the Federal Communications Commission ("FCC") as items of concern leading to the withdrawal of its Section 271 Application for Georgia and Louisiana. BellSouth has refiled the application with the FCC having addressed the five areas. Commission Staff seeks a narrative description of each area as it relates to BellSouth's compliance with 47 U.S.C. § 271 in Kentucky. The five items are: (1) the timeliness of evidence demonstrating that competing carriers could integrate or have successfully integrated pre-ordering and ordering functionality; (2) BellSouth's performance on service order accuracy; (3) the accuracy of certain performance data; (4) the timeliness of evidence of the "double FOC" performance issue related to the due date calculator; and (5) the timeliness

of evidence related to the allocation of resources in the Change Control Process.¹

RESPONSE

On February 21, 2002, BellSouth filed its Response in Opposition to a Motion by AT&T, MCI, and SECCA which suggested that the Commission have additional process in this docket based on BellSouth's December 20, 2001, withdrawal of its 271 application to the FCC for the states of Georgia and Louisiana. The notice of withdrawal advised the FCC that BellSouth would shortly refile its application and address certain concerns raised by CLECs during the review process. BellSouth refiled its 271 application for Georgia and Louisiana on February 14, 2002. As part of that application, BellSouth addressed each of the five items listed in the Commission's Initial Data Request. BellSouth's February 21, 2002, response attached a copy of the February 14, 2002, Georgia/Louisiana filing with the FCC. That material included BellSouth's brief which contains a detailed narrative regarding the five issues. Because the five issues are regional, BellSouth's response addresses these issues as they pertain to its 271 application in Kentucky. BellSouth previously provided the Commission one paper copy of the FCC

¹ See BellSouth's letter to the FCC filed December 20, 2001 in CC Docket No. 01-277.

filing. It attaches hereto an additional ten copies of the
brief for the convenience of the Commissioners and Staff.

Respectfully submitted,

Creighton E. Mershon, Sr.
601 W. Chestnut Street, Room 407
P. O. Box 32410
Louisville, KY 40232
Telephone No. (502) 582-8219

Fred J. McCallum, Jr.
Lisa S. Foshee
Suite 4300, BellSouth Center
675 W. Peachtree Street, N.E.
Atlanta, GA 30375
Telephone No. (404) 335-0793

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.