

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 SUPPLEMENTAL DIRECT TESTIMONY OF CYNTHIA K. COX
3 BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
4 ADMINISTRATIVE CASE NO. 2001-105
5 JUNE 22, 2001

6
7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. (“BELLSOUTH”) AND YOUR BUSINESS
9 ADDRESS.

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11 A. My name is Cynthia K. Cox. I am employed by BellSouth as Senior Director for
12 State Regulatory for the nine-state BellSouth region. My business address is 675
13 West Peachtree Street, Atlanta, Georgia 30375.

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15 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

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17 A. Yes. I filed direct testimony in this proceeding on May 18, 2001, including five
18 exhibits.

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20 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT
21 TESTIMONY?

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23 A. The purpose of my supplemental direct testimony is to amend portions of my
24 Direct Exhibit CKC-5. The portions of Direct Exhibit CKC-5 that have been
25 revised include the Statement of Generally Available Terms and Conditions

1 (“SGAT”), SGAT Attachment A (Price List), SGAT Attachment C (Service
2 Descriptions), and SGAT Attachment F (Line Information Data Base (“LIDB”)).
3 The SGAT, SGAT Attachment A, and SGAT Attachment C have been amended
4 to add terms, conditions and cost-based rates for combining network elements that
5 are typically combined in BellSouth’s network. SGAT Attachment F is being
6 amended to include the LIDB storage agreement and two addendums that should
7 have been included in BellSouth’s May 18, 2001 filing. The amended portions of
8 Direct Exhibit CKC-5 are attached to my supplemental testimony.

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10 Q. WHY IS BELLSOUTH FILING THESE NEW RATES?

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12 A. In its May 16, 2001 Order in Case No. 2000-465 (“AT&T/BellSouth Arbitration
13 Case”), the Kentucky Public Service Commission (“Commission”) ruled that
14 BellSouth must combine unbundled network elements (“UNEs”) for AT&T if the
15 elements are typically combined by BellSouth in its network, and must do so for a
16 charge that is determined in accord with the TELRIC methodology. The
17 Commission’s Order requires BellSouth to combine UNEs at any location in
18 Kentucky even where they are not presently combined. In order to be compliant
19 with the Commission’s order, BellSouth is filing rates for “new” combinations.
20 The rates for providing new combinations, contained in the revised SGAT
21 Attachment A attached to my supplemental testimony, are equal to the cost study
22 results filed by BellSouth witness Ms. Daonne Caldwell on June 22, 2001 in the
23 generic UNE cost docket (Administrative Case No. 382).

24

1 Q. DOES THIS MEAN THAT BELLSOUTH HAS CHANGED ITS POSITION, AS
2 DISCUSSED IN YOUR DIRECT TESTIMONY, THAT BELLSOUTH IS NOT
3 OBLIGATED TO PROVIDE NEW COMBINATIONS AT COST-BASED
4 RATES?

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6 A. No. BellSouth's position on this issue remains the same as I discussed in my
7 direct testimony. The FCC's and the Eighth Circuit Court's previous rulings
8 remain in effect – BellSouth has no obligation to combine network elements for
9 competitive local exchange carriers (“CLECs”) when those elements are not
10 currently combined in BellSouth's network. Moreover, the Commission's Order
11 requires that BellSouth perform the combining at a price that may have no
12 relationship to the current cost of performing the “combining” work.

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14 Q. HAS BELLSOUTH CHALLENGED THE COMMISSION'S MAY 16, 2001
15 RULING?

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17 A. Yes. On June 4, 2001 BellSouth filed with the Commission a Motion for
18 Reconsideration of the May 16, 2001 Order. In its Motion for Reconsideration,
19 BellSouth encourages the Commission to reconsider its decision on this issue
20 citing, among other things, that the Commission's decision, as presently written,
21 imposes a greater burden on BellSouth than is legally permissible. As fully
22 explained in my direct testimony, as well as in BellSouth's Motion for
23 Reconsideration, the rulings of the Eighth Circuit Court and the FCC clearly
24 demonstrate that BellSouth is not obligated to combine network elements for
25 CLECs when those elements are not currently combined in BellSouth's network.

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2 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?

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4 A. Yes.

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