

REQUEST: Please produce all documents that reflect the negotiations surrounding BellSouth's engagement of KCI for the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 1, in the Georgia 271 docket.

REQUEST: Please produce all documents that relate to, reflect or represent all compensation received by KCI for the testing done on BellSouth's OSS in Georgia.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 2, in the Georgia 271 docket.

REQUEST: Please produce any and all internal audits, change orders or work orders under the contract between KCI and BellSouth for Georgia Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 1 and 2, in the Georgia 271 docket.

REQUEST: Please produce all drafts, revisions and edits of the Georgia Master Test Plan and all subparts respectively revised and agreed upon by KCI and BellSouth to include but not limited to revisions filed with the GPSC on 10/16/99, 12/15/99 and 3/21/2000.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 5 in the Georgia 271 docket.

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REQUEST: Please produce all drafts, revisions, and edits of the Georgia Final and Supplemental Test Reports, including, but not limited to, related electronic mail, notes, memoranda and other correspondence.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 6 in the Georgia 271 docket.

REQUEST: Please produce all data provided by BellSouth to KCI or Hewlett Packard ("HP") related to the Georgia and Florida OSS Tests, to include all revisions, changes, work papers, and drafts.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 6 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 7, in the Georgia 271 docket.

REQUEST: Please produce all correspondence and documents referring or relating to the Georgia and Florida OSS Tests, including, but not limited to, analysis or evaluation of information whether in letter, facsimile (fax), or electronic or other form, between or among any of the following entities: KCI, BellSouth, the GPSC, FPSC, and HP and Competing Local Exchange Carriers ("CLECs").

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 7 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 8, in the Georgia 271 docket.

REQUEST: Please produce all documents related to exception reports filed by KCI, including, but not limited to revisions, drafts, working papers and communications between BellSouth and KCI relating to any proposed exception report, in connection with the Georgia or Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No.8 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 11, in the Georgia 271 docket.

REQUEST: Please produce all withdrawn "draft exception" reports and related documents, to include but not limited to all comments sent or received from BellSouth and any subsequent communications, and all communications from BellSouth to KCI for the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 9 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 12, in the Georgia 271 docket.

REQUEST: Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from the GPSC and FPSC on the exception or closure reports in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 10 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 13, in the Georgia 271 docket.

REQUEST: Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from HP on the exception or closure reports in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 11 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 14, in the Georgia 271 docket.

REQUEST: Please produce all notes taken by any participant in the weekly Georgia OSS and Florida OSS conference calls referenced in various Status Reports.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 12 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 15 in the Georgia 271 docket.

REQUEST: Please produce all documents detailing or related to any process for reviewing CLEC communications relating to the Georgia and Florida OSS Tests, including, but not limited to, documents demonstrating who at KCI or BellSouth received the communications, to whom they were disseminated, the process for evaluating the communicated information, and the plan and process for responding.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 13 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 13, in the Georgia 271 docket.

REQUEST: Please produce a log, including date, time, participants, agenda, and topics discussed, of all calls and meetings between KCI and BellSouth or between BellSouth and the GPSC and between BellSouth and the FPSC or among KCI, BellSouth and the GPSC or FPSC. Please provide copies of all notes taken by any participant in the calls identified.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 14 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 16, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to KCI's evaluation of the accuracy of BellSouth's reports of flow through rates for BellSouth's own business and residential orders in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 15 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 18, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to consideration of whether to evaluate the degree of parity between flow through rates for individual CLEC and BellSouth in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 16 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 19, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 17 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 20, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to retesting of BellSouth's proposed modifications to remedy Exception Nos. 9, 24 and 91 and any other exceptions closed on the basis of proposed fixes in the Georgia OSS Test.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 18 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 21, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to the basis for determining the number of calls used during retests of billing exceptions in the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 22, in the Georgia 271 docket.

REQUEST: Please produce all documents related to any retesting or reconsideration of any exception after the issuance of the closure report on the exception in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 20 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 23, in the Georgia 271 docket.

REQUEST: Please produce all system outage logs for BellSouth systems necessary for the Georgia and Florida OSS Test.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 21 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 24, in the Georgia 271 docket.

REQUEST: Please produce any documents provided by BellSouth to KCI that were relied upon in building the interfaces to place orders with BellSouth for the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 22 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 25, in the Georgia 271 docket.

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REQUEST: Please produce all documents related to the construction of the TAG and EDI interfaces in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 23 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 26, in the Georgia 271 docket.

REQUEST: Please produce all job aids, methods and procedures, and maintenance methods and procedures used to evaluate the DSL portion of the Supplemental Test Plan in the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 27, in the Georgia 271 docket.

REQUEST: Please produce all documents related to the determination of the P-value calculations in the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 28, in the Georgia 271 docket.

REQUEST: Please produce all documents referring or relating to recommendations for modification of the Georgia and Florida OSS Tests received from any entity.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 26 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 29, in the Georgia 271 docket.

REQUEST: Please produce all documents referring or relating to the scope of the Georgia and Florida OSS Tests as defined by the GPSC and the FPSC.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 27 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 30, in the Georgia 271 docket.

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REQUEST: Please produce all BellSouth analysis and evaluation related to the AT&T Georgia 1000 Test of BellSouth provision of UNE-P.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 31, in the Georgia 271 docket.

REQUEST: Please produce all documents related to KCI's determination that any exception was satisfied, not satisfied, or no determination was made in the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 32, in the Georgia 271 docket.

REQUEST: Please produce all documents that refer or relate to the standards or methodologies used to make the following determinations during the Georgia OSS Test: "satisfied," "not satisfied," "material adverse impact on competition," "no material adverse impact on competition," "statistically significant," and "not statistically significant."

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 33., in the Georgia 271 docket.

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REQUEST: Please produce all documents related to the decision to terminate the Georgia OSS Test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 34, in the Georgia 271 docket.

REQUEST: Please produce retest transactions, analysis and evaluations on any open exceptions in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 32 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 35, in the Georgia 271 docket.

REQUEST: Please produce all documents relating to the design consideration and implementation of re-testing in the Georgia OSS Test, including, but not limited to, the volume to be tested and the product mix for retesting, for every transaction-based test.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production, POD No. 36, in the Georgia 271 docket.

REQUEST: Please produce all documents relating to the design and implementation of each test bed account in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 34 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents related to the design, methodology and implementation of data integrity testing of performance measures in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD No. 35 in North Carolina Utilities Commission Docket P-55, Sub 1022 and POD No. 37, in the Georgia 271 docket.

REQUEST: Please produce copies of any and all Test Cycle Logs included as part of the cycle report in the Master Test Plan in Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 36 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce any reports, data, analysis, or other documentation that describe BellSouth's procedures for augmenting interconnection trunk groups, including engineering standards used for making the determination to augment.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 37 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please provide Trunk Group Service Detail for all CLEC trunks that had blocking in excess of 3% during the months of Nov. 2000 through April 2001 in Kentucky. Please provide this information in electronic form on an Excel spreadsheet or equivalent.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 38 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please provide the detailed WFA logs for interconnection trunks provisioned to AT&T during the past 6 months. Include both BellSouth Managed and CLEC Managed trunks. Please provide this information in electronic form, such as an Excel spreadsheet, if possible.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 39 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please provide LCSC's standard work unit volume graphs for the latest 12 months.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 40 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents relating to the group or department that reviews work performed by the LCSC representatives to ensure the accuracy of the issued order based on the information submitted by the CLEC in the LSR. Include documents relating to its methods, procedures and work papers.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 40 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce a copy of BellSouth's Performance Measurements Quality Assurance Plan ("PMQAP").

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 42 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce copies of all Service Center Call Data, including Call Management System Reports, timeliness information, call abandonment rates, hold time range/median/mode and raw data.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 43 (1st and Supplemental Responses) in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents related to or used for “method one” and “method two” as described on pages 6 and 9 of the Affidavit of Victor K. Wakeling attached as Exhibit CKC-4 to the Direct Testimony of Cynthia Cox (May 18, 2001) (“*Wakeling Aff.*”..).

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 44 in North Carolina Utilities Commission Docket P-55, Sub 1022. In addition, please see attached.

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REQUEST: Please produce all correspondence, including electronic mail, between Pricewaterhouse Coopers LLC ("PwC") and BellSouth regarding or related to the Attestation Report filed as Exhibit OSS-74.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 45 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all information provided to PwC by BellSouth for the evaluation performed by PwC filed as Exhibit OSS-74.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 46 in North Carolina Utilities Commission Docket P-55, Sub 1022.

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REQUEST: Please produce all drafts and comments on any drafts on the Attestation Report prepared by PwC.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 47 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all work papers prepared by PwC as part of the examination of BellSouth OSS.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 48 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents by state relating or referring to loss of dial tone incidents in the year 2001 involving CLEC UNE-P customers.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 49 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents by state relating or referring to UNE-P User Group Meetings in which loss of dial tone incidents were discussed.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 50 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents relating or referring to the action plan or steps and the timeline for the development or generation of a new "single C-order" (change order) process for the UNE-P conversions.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 51 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents that relate to BellSouth's attempts to increase the capacity of its OSS production systems.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 52 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents that relate to attempts by BellSouth to solicit or consider input from CLECs regarding the design or PMAMP, SEEM or SQM.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 53 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents that relate to the decision by BellSouth to include or exclude from SEEM or any particular performance measures.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 54 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents that relate to the determination by BellSouth of where and how to set the penalty levels in SEEM.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 54 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please produce all documents that refute or support the statement contained in Victor Wakeling's affidavit that "The data demonstrate that competition in Kentucky's local exchange market is economically viable, rapidly expanding, irreversible, and serving the public interest." (*Wakeling Aff. at 2-3*).

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 56, part 1), 2), 4), 5) and 6) in North Carolina Utilities Commission Docket P-55, Sub 1022.

3) Local Telephone Competition: Status as of December 31, 2000,
Industry Analysis Division, Common Carrier Bureau, Federal
Communications Commission, May 2001.

At Table 6, this release indicates four (4) large CLECs reported serving over 56,000 end-user lines in Kentucky as of the end of December 2000. This is an increase of one CLEC (serving at least 10,000 lines in the state) from the prior report for June 2000, which did not disclose the lines served for purposes of confidentiality.

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REQUEST: Please produce all correspondence referring or relating to the Georgia OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, HP, and PwC.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

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REQUEST: Please provide any and all correspondence between BellSouth and PwC regarding the Attestation Report filed as Exhibit OSS-74.

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, POD 45 in Alabama 271 Docket.

REQUEST: Please provide floor plans for at least three central offices in Louisville, Kentucky that contain collocation. Please ensure that the floor plans show the entire central office including the BellSouth telecommunications area and the collocation areas. Further, please ensure that the frame placements in the central office are labeled with the type of equipment that is located in those areas.

RESPONSE: Attached are the floor plans for three central offices in Louisville, Kentucky. Please note that all BellSouth Certified Contractors ("BCCs") have access to engineering drawings, which include floor plans for BellSouth's central offices.

REQUEST: Please provide the document or documents specifying the engineering guidelines used by BellSouth in planning and utilizing the telecommunication space within its central offices in Kentucky and each of the BellSouth states. Please ensure that this document or documents contains the information outlining how various pieces of telecommunications equipment including interconnection frames, power, transport, and switching equipment are related to one another within the central office from a space planning standpoint.

RESPONSE: The following documents are utilized by BellSouth for space planning purposes:

1. Network Equipment –Building System (NEBS) Requirements: Physical Protection (GR-63-CORE). This is a copyrighted Telcordia document, therefore AT&T can request this document directly from Telcordia.
2. BellSouth Engineering and Installation Standards Central Office Equipment (TR-73503). This document is attached to this request on a CD.
3. Vendor specific system/equipment documentation, which addresses such issues as power and interconnection requirements, heat dissipation, floor loading, cable length limitations, etc. This information is protected, in most cases, under contract provisions between the vendor and BellSouth that prohibit BellSouth from providing this information to an outside third party, without prior written authorization from the vendor. Furthermore, this documentation is extremely voluminous and would be overly burdensome to produce.

In addition to the above, practical and economic engineering, as well as FCC collocation rules, are applied to the technical limitations and requirements outlined in the above documentation. BellSouth does not have a specific document that addresses globally all of the vendor specifications for every piece of equipment within each of its central offices. Each vendor has its own documentation for its specific products.

REQUEST: Please provide a tour of any three central offices within the Louisville, Kentucky area that contain collocation arrangements. The tour should permit escorted access to the collocation arrangements, interconnection frames, power equipment used for collocation, and the cable vault.

RESPONSE: BellSouth objected to this request and AT&T agreed to consider withdrawing this request if BellSouth provides building plans for three Central Offices. See the response to Item No. 59, preceding

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REQUEST: Please provide all documents relating to the dead air problems identified in Trouble Ticket Nos. KI015929 and KI016185.

RESPONSE: Attached

REQUEST: Please provide all documents relating to any BellSouth facility or network changes effecting telecommunications traffic at the Louisville Armory Place switching facility during the period of January 1, 2000 to present.

RESPONSE: The significant network changes involved in this request are documented in a substantial volume of disjointed records involving all aspects and associated minutia of such large-scoped projects like project authorizations and approvals, orders to switch vendors, project management records, meeting records, schedules and schedule changes, billing records, equipment inventory records, acceptance testing records, methods of procedures, etc.

BellSouth objects to providing such a large number of documents that are not easily retrievable and which would require significant resources and time to accomplish.

REQUEST: Please provide all documents relating to any testing, inspections, troubleshooting or verification of functionality of the facilities or network at the Louisville Armory Place switching facility relating to telecommunication traffic.

RESPONSE: See Response to POD 62.

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REQUEST: Please provide all documents relating to the identification and repair of the faulty T1 card located at the Louisville Armory Place switching facilities during the period of January 1, 2001 to the present.

RESPONSE: All related documents are provided in response to Item 62.

REQUEST: Please provide all documents relating to BellSouth's internal troubleshooting or investigation of its network and facilities upon notification that AT&T Broadband customers were experiencing the dead air problems identified in Trouble Ticket Nos.KI015929 and KI016185, during the period of March 16, 2001 to the present.

RESPONSE: All related documents are provided in response to Item 62

REQUEST: Please provide all documents relating to BellSouth's actions in response to the issues raised in AT&T Broadband's letter dated May 2, 2001 from Denise Berger to Jann Burris, attached as Exhibit JBC-2 to AT&T witness Coleman's Testimony filed July 9, 2001.

RESPONSE: As indicated in BellSouth's response to Item 181, AT&T's 1st Interrogatories, Kentucky Public Service Commission, Case No. 2001-105, a response to Ms. Berger's letter was provided in Mr. Jenkins' letter dated May 24, 2001.

Mr. Jenkins' response was based on discussions with the BellSouth Network Manager, Chris Barnes, and review of the BellSouth trouble log notes which are included under Item 62. Mr. Barnes' response outlining his investigation and assessment of the events are also included in Item 62.

REQUEST: Please provide documents related to any problems conveyed to BellSouth regarding the "double billing" by BellSouth of AT&T Broadband customers for service after the porting of such customers from BellSouth service to AT&T Broadband service.

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

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REQUEST: Please provide documents related to any problems conveyed to BellSouth regarding the inability of AT&T customers to receive local calls from BellSouth customers.

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

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REQUEST: Please provide documents relating to any problems conveyed to BellSouth regarding the reassignment of the AT&T Broadband customer telephone numbers by BellSouth after porting from BellSouth service to AT&T service.

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

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REQUEST: Please provide documents relating to the issues raised in AT&T
Broadband letter dated May 25, 2001 from Denise C. Berger to Jan Burris
attached as Exhibit JBC-4 to AT&T witness Coleman's Testimony filed
July 9, 2001.

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

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REQUEST: Please provide documents relating to the rescheduling of customer service transitioning scheduled on June 9, 2001 for AT&T Broadband service

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

REQUEST: Please provide documents relating to BellSouth's justification or cause for rescheduling customer service transitions from BellSouth service to CLEC service during the period of January 1, 2001 to the present.

RESPONSE: All related documents are provided in response to Interrogatory Item 182.

REQUEST: Please produce all contracts, work orders, or other documents between BellSouth and PwC outlining the scope of PwC's work in preparing the Attestation Report filed as Exhibit OSS-74.

RESPONSE: There are no documents responsive to this request in BellSouth's possession, custody or control beyond the response provided for North Carolina POD No. 45. Please refer to the response to AT&T's First Request for Production of Documents, POD 45 in North Carolina Utilities Commission Docket P-55, Sub 1022.

DUPLICATE OF 45

REQUEST: Please produce all correspondence, including electronic mail, between PwC and BellSouth regarding or related to the Attestation Report filed as Exhibit OSS-74.

RESPONSE: This request is an exact duplicate of Request 45. Please see Request 45 for response.

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DUPLICATE OF 46

REQUEST: Please produce all documents and information provided to PwC by BellSouth for the evaluation performed by PwC filed as Exhibit OSS-74.

RESPONSE: This request is an exact duplicate of Request 46. Please see Request 46 for response.

DUPLICATE OF 47

REQUEST: Please produce all drafts and comments on any drafts regarding the Attestation Report prepared by PwC filed as Exhibit OSS-74.

RESPONSE: This request is an exact duplicate of Request 47. Please see Request 47 for response.

DUPLICATE OF 48

REQUEST: Please produce all correspondence referring or relating to the Georgia OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, HP, and PwC.

RESPONSE: This request is an exact duplicate of Request 48. Please see Request 48 for response.

REQUEST: Please produce all internal BellSouth documents that describe how BellSouth handles disconnect orders associated with a CLEC UNE-P order and that describe how BellSouth coordinates its disconnect orders with a CLEC UNE-P order.

RESPONSE: These documents contain proprietary information and will only be made available subject to an appropriate protective agreement.

REQUEST: Please provide any and all documents related to and relied upon in responding to AT&T's Interrogatories to BellSouth.

RESPONSE: Documents related and relied upon are provided with the corresponding Production of Document or Interrogatory Request Item.

REQUEST: Please provide all responses and documents to any data request filed in Case No. 2001-105.

RESPONSE: Parties will be served with copies of all filed data requests as part of the filing procedure.