

- REQUEST: To the extent that Mr. Milner and Mr. Wakeling's reported number of resold lines, UNE loops and UNE Loop/Port Combinations differ, please provide:
- a. A listing of each type of arrangement counted by Mr. Milner and/or Wakeling that is not considered by the other;
  - b. The exact number of lines in each category identified in (a) above;
  - c. An explanation as to why one witness includes the category in (a) above and the other does not;
  - d. Identify whether the category is included/not-included in BellSouth's Form 477 Reports to the FCC; and
  - e. For any category not included by BellSouth in its Form 477 reports to the FCC, explain why the category was not included.

RESPONSE:

- A. There are no significant differences in the lines counted by Messrs. Milner and Wakeling. Mr. Milner's Exhibit WKM-9 shows the count of resold "units" for the top fifty services available for resale ("Top 50"), which includes most types of resold lines. Item numbers 1, 2, 3, 9, 14, 17, 18, 19, 24, 25, 27, 28, 33, and 34 in Exhibit WKM-9 are resold lines. Mr. Wakeling only counts the items for the list of CLECs shown in his exhibits. Another difference arises between Mr. Wakeling's source data (which requires customer specific information) and Mr. Milner's source data (which is not customer specific), i.e. billed versus booked data sources. In addition to the types of lines included in WKM-9, Mr. Wakeling also includes resold FCO/FX lines, toll terminals, Business Plus/Business Choice, and WATS lines.

In the course of reconciling the counts on these two exhibits, it was discovered that Mr. Wakeling's source data inadvertently included 154 resold "units" which should not have been counted as resold lines. When these 154 units are subtracted from Mr. Wakeling's Exhibit VW-3, the share of CLEC lines computed on his exhibit drops a minimal amount, from 7.3% to 7.2%. The Method 2 estimate (Exhibit VW-4) remains at 5.4%.

- B. For items listed in A above, all resold lines reflected in WKM-9 for Kentucky total 36,042 resold lines. Mr. Wakeling presents 34,733 resold lines for the list of CLECs in his Exhibit VW-3. The comparable number from Mr. Wakeling's source data that compares to Exhibit's WKM-9 resold lines is 34,032. The additional resold FCO/FX lines, toll terminals, Business Plus/Business Choice, and WATS lines accounted for a further 777 resold lines included in the Exhibit VW-3 total.

Mr. Milner states there are UNE loops in Kentucky totaling 5,330. Mr. Wakeling attributes 5,127 UNE loops to the list of CLECs shown in his Exhibit VW-6. Mr. Wakeling's count a) is associated with the CLECs identified in his Exhibit VW-6 and b) is based on an extract from the loop history table from the Work Force Administration system. Mr. Milner's slightly higher aggregate amount was extracted from billing systems. The same UNE loop categories are believed to be reflected in both.

Mr. Milner states there are UNE Combinations in Kentucky totaling 14,635. Mr. Wakeling attributes 14,307 UNE Combinations to the list of CLECs shown in his Exhibits VW-6 and VW-7. Again, Mr. Wakeling's slightly lower total is associated with the CLECs identified in his Exhibits versus Mr. Milner's "Top 50" count. The UNE-P categories for Mr. Wakeling's exhibits and Mr. Milner's amount all consist of Product Group 644 for residence and Product Group 681 for business.

- C. Answer included in A, B. above. The purpose of Mr. Milner's Exhibit WKM-9 is to demonstrate for the 271 checklist that CLECs are purchasing services for resale from BellSouth in sizable quantities. The point is amply made by showing only the top 50 types of resold units in WKM-9. Mr. Wakeling's exhibits are "bottoms up" approaches to demonstrating lines in Kentucky for the CLECs identified for purposes of Track A.
- D. BellSouth is attaching a display that shows the resold line USOCs included in the extract supporting Mr. Wakeling's Exhibits for March 2001. All of these USOCs are believed to be included in the Form 477. The resale line USOCs appear in the "LINE USOC" column. Confidential CPNI CLEC information is redacted. As explained in A above, the entry "# N/A" in the "LINE USOC" column identifies a USOC that was originally

included in Mr. Wakeling's Exhibits but has since been recognized as being included in error. The total of these erroneous USOCs (indicated as "# N/A") sums to the adjustment of -154 lines described in A above. As indicated above, Mr. Milner's resale count (top 50 resale items) and resale in Mr. Wakeling's Exhibits (for CLEC's identified) are not intended to be exactly the same as the Form 477 count. Total resold lines, UNE loops, and UNE Combinations are included in Form 477 Reports to the FCC. BellSouth believes it includes all the categories required by the Form 477 instructions.

E. See response to D.

In summary, the differences between amounts used by Mr. Milner and Mr. Wakeling are immaterial, and do not affect the conclusions presented in BellSouth's testimony/affidavit as filed.

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