


AFFIDAVIT

STATE OF GEORGIA

COUNTY OF FULTON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Cynthia K. Cox, BellSouth Telecommunications, Inc., being by me first duly sworn deposed and said that:

She is appearing as a witness before the Kentucky Public Service Commission in "Investigation Concerning the Propriety of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996," KY PSC Case No. 2001-105, and if present before the Commission and duly sworn, her testimony would be set forth in the annexed transcript consisting of 3 pages and 0 exhibit(s).


Cynthia K. Cox

SWORN TO AND SUBSCRIBED BEFORE ME this
7th day of September, 2001.


NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005

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BELLSOUTH TELECOMMUNICATIONS, INC.
SURREBUTTAL TESTIMONY OF CYNTHIA K. COX
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION
CASE NO. 2001-105
SEPTEMBER 10, 2001

8 Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH
9 BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

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

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

17 A. Yes. I previously filed direct testimony in this proceeding on May 18, 2001,
18 supplemental direct testimony on June 22, 2001, rebuttal testimony on July 30, 2001, and
19 additional supplemental direct testimony on August 29, 2001.

21 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

23 A. The purpose of my surrebuttal testimony is to respond, in part, to the testimony filed by
24 Ms. Sherry Lichtenberg on behalf of WorldCom, Inc. on August 20, 2001.

1 Q. MS. LICHTENBERG STATES (ON PAGE 2) THAT WORLDCOM'S LOCAL
2 SERVICE REQUEST ("LSR") VOLUME FOR JUNE, COMPARED TO THE TOTAL
3 UNE LSRs FOR BELLSOUTH'S REGION, SUPPORTS WORLDCOM'S
4 ALLEGATION THAT "FULL-FLEDGED" COMPETITION IS NOT PRESENT IN
5 BELLSOUTH'S REGION. DO YOU AGREE?

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7 A. No. Contrary to Ms. Lichtenberg's contention, the volume of LSRs that WorldCom
8 acknowledges for its local residential service division (MCI) in June corroborates the fact
9 that local competition is robust. The UNE Flow-Through report for June that Ms.
10 Lichtenberg cites (and that is attached to her testimony) indicates that MCI submitted to
11 BellSouth 18,665 LSRs for processing. Ms. Lichtenberg alleges that the fact that MCI's
12 LSR total for June is 22% of all the electronic UNE LSRs in June for the entire BellSouth
13 region undermines "BellSouth's contention that full-fledged competition has broken out
14 in its territory." On page 3, Ms. Lichtenberg adds that MCI "...is continuing to submit
15 about 1,000 transactions a day." In fact, rather than supporting Ms. Lichtenberg's
16 allegations, MCI's own statistics support BellSouth's position that competition is robust
17 throughout its region. The UNE LSR transaction volumes - either the total of over
18 84,000 LSRs in June or MCI's continuing "1,000 transactions a day," in addition to
19 orders from other CLECs - imply an annualized quantity of approximately 1 million
20 CLEC UNE LSR transactions for the BellSouth region. Such a volume would represent
21 an approximate 40% annual growth rate compared to the mid-2001 installed base of
22 CLEC facility-based lines in BellSouth's region. Obviously, such an annualized growth
23 rate is proof of robust competition, rather than proof of a lack of competition.
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1 Q. IS THE CURRENT VOLUME OF NEW ORDERS ALONE A TRUE MEASURE OF
2 THE LEVEL OF COMPETITION?

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4 A. No. The UNE Flow Through Report represents new orders, but it does not reflect the
5 actual level of facility-based lines in service. Further, MCI's recent individual strong
6 showing does not diminish the progress other CLECs are making (and have already
7 made). In fact, MCI's successful Georgia launch only adds credence to BellSouth's
8 position that CLECs can compete, and are competing, in the local market.
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11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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13 A. Yes.

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