

REQUEST: Please provide BellSouth's response to Ms. Lichtenberg's testimony that BellSouth contacted CLEC customers and won them back before the service was put in.

RESPONSE: The requests to process switchback orders to BellSouth were initiated by the end user on both accounts after service was established with the CLEC as discussed by Ms. Lichtenberg in her testimony on October 24. At the end user's request, the BellSouth Service representative negotiated service orders to return the end user to BellSouth. Both accounts are noted to substantiate that the transactions were requested by the end users. (See attached documentation.) In addition, both transactions were validated by third party verification. As additional information, neither customer is located in Kentucky; they are both Georgia customers.

**BellSouth Records**

[REDACTED]

[REDACTED] 119 \*MEM1\* JAN 14 1995 \*FINAL\* ATLS 1FR NLS  
DUPL CUST EXIST (7) GRP 06 PO  
[REDACTED] A1 STA TAX NNNN CC D MCC\* C03  
[REDACTED] A2 RTA TAR 023701 DOD 123094 DOI 050593  
APT 10 RB FXX NT AVT 0 DEP 01-95 SCHLD WO 1214-  
E PT GA 30344 PPD CCH AMT DUE 0.00

**1001 TEMP CPNI ANSWERED QUESTIONS ABOUT ACCOUNT \*\*\* PDSTSNL**  
**0927 PAGERS WSCCPTC**  
**0927 OLT TO MKTING, ALSO CHECKED BALANCE DUE ON WSCCPTC**  
**→ 0927 TO MCI METRO WANTS TO COME BACK TO BELL SOUTH**  
**→ 0927 NWC PSG LH/ MS PRICE CALLED IN RE SVC WAS SWITCHED**

---RMKS  
RMKR (A) TPV REJECT OLT MS TO JOE @  
TPV 2 VRFY LOCAL SVC 2 BST  
FRM 'MCI METRO' TPV REP HD  
WRNG PHN # JXW 100101 NOB2N8H7

[REDACTED]

[REDACTED] 700 \*MEM1\* OCT 04 2001 \*LIVE\* E JNBO 14R NP  
DUPL CUST EXIST (3) PORC  
[REDACTED] PB O26 STA TAX NNNN CC B MCC0 C1884  
[REDACTED] RA RTA TAR 000703 TBE A9 0222 DOI 100301  
JNSBRO GA 30238 RB N27 NT AVT 100 DEP -00  
PPD CCH N AMT DUE 38.61  
CI OS [REDACTED] & 5524 EMPLD GMAC WK# [REDACTED]  
\*CIV 1001  
(BSUM) SS(1);X NAT FE TP3WF802SR M  
IC 3/0000 2/0000 P/0000 TRT 000000000000 RCK 000000000000 [REDACTED]  
LB 0.00 BAL 0.00 CC 38.61 TOT 38.61 LP  
DATE TYPE NOTATIONS URB 1.55  
DEN 37.06  
FU ACT USERID

**1012 TEMP CPNI ANSWERED QUESTIONS ABOUT ACCOUNT \*\*\* BYJSQTY**  
**→1011 TOLL SERVICE WYRZYTS**  
**→1011 VERIFY HE CHANGED OVER TO BELLSOUTH FOR LOCAL**  
**→1011 MIS ANTHONY ROGERS REQUESTED 3 WAY WITH MCI TO**  
**1011 TEMP CPNI ANSWERED QUESTIONS ABOUT ACCOUNT \*\*\* WYRZYTS**  
**1004 TEMP CPNI ANSWERED QUESTIONS ABOUT ACCOUNT \*\*\* PKLKFKW**  
**1004 SIC 053731 IDOR,020688 \*\*\* RI10A02**  
**1003 IMAT R 770 210-5524 276 LNPD DOR:060397 B \$0.01 1004 DOR RI10A02**  
**1003 IMAT R 770 210-4106 698 PF DOR:020688 B \$0.00 1004 DOR RI10A02**

---RMKS  
RMKR (A) WINBACK ORDER, THIRD PART  
VERIFICATION, CUSTOMER MR  
[REDACTED], 10-03-2001,

BellSouth Telecommunications, Inc.  
Kentucky PSC Case No. 2001-105  
Second Set of Late Filed Exhibits  
BellSouth Late Filed Exhibit No. 2  
Page 1 of 1

REQUEST: Please update the numbers provided in Wakeling's Exhibits VW-3 and VW-4.

RESPONSE: Please see attached for redacted and updated Exhibits VW-3 and VW-4.  
The volumes reflected on these exhibits are for August, 2001.

REQUEST: Please provide the exact number of Interconnection Agreements as of October 22, 2001 in Kentucky.

RESPONSE: The total number of Interconnection Agreements in Kentucky is 555.  
Please see the attached for a current listing.

REQUEST: Please provide a list of activities associated with the collocation “hibernation” fee.

RESPONSE: From a review of the Kentucky hearing transcripts, it appears that a misnomer of “hibernation” was applied to BellSouth’s policy of allowing a collocator to reduce power (“power down”) its collocation space. As such, there is no such thing as a “hibernation” fee. However, there are specific charges associated with a collocator’s request to reduce power to its existing collocation arrangement(s). To continue collocation occupancy in accordance with the FCC rules, BellSouth will permit a collocator that has ordered DC power from BellSouth’s main power board to reconfigure its power to run directly from the BellSouth Battery Distribution Fuse Board (“BDFB”) and reduce power or “power down” to a minimum 10-amp fuse capacity. A collocator that currently receives its DC power directly from the BellSouth BDFB may also “power down” to a minimum 10-amp fuse capacity.

The following procedures have been implemented by BellSouth when a collocator requests a reduction in power to its collocation space:

1. The collocator sends BellSouth a subsequent application for a Reduction of Power. The current subsequent application fee would be assessed for the processing of this application. (Please note that BellSouth is currently in the process of developing a cost-based rate specifically associated with a collocator’s request to reduce its existing collocation power.)
2. In addition to submitting the subsequent application for a Reduction of Power, the collocator submits an “Agreement for Collocation Customer to Install Undersized Power Feeders.” (See Attached Document) As clarification, “Undersized Power Feeders” are defined as any case where the ampacity rating of the overcurrent protection device is less than the maximum peak, List 2, or worst-case manufacturer stated drain for the Customer’s equipment.
3. If the collocator receives its power directly from BellSouth’s main power board, the collocator’s BellSouth Certified Contractor (“BCC”) disconnects the power feeds from the BellSouth main power board, removes the associated cabling and installs power feeds to a BellSouth

BDFB. In addition, the collocator's BCC must update any affected central office records, purchase the necessary breakers, correct stenciling and prepare Methods and Procedures (M&Ps) for BellSouth's Network Operations. If the collocator is already receiving its power from the BellSouth BDFB, then the collocator would only have to update the affected central office records, purchase the necessary breakers, correct any stenciling, and prepare M&Ps for BellSouth's Network Operations. The minimum power requirement that BellSouth will allow the collocators to receive in a "power down" arrangement is 10 amps.

4. When a collocator determines that it is ready to "power up" its equipment, the collocator would again submit a subsequent application, along with the subsequent application fee, specifying what its new power needs are. Termination of "hibernation" (or a "power up") is considered by BellSouth to be an upgrade to an existing arrangement, and as such, would require all of the same power modifications and work activities associated with an upgrade to an existing arrangement.

By the execution of this Agreement, Collocation Customer (Customer) agrees to waive, release, discharge, indemnify and save harmless BellSouth Telecommunications, Inc. for any damage, loss, claim, action, causes of action of whatever kind or nature, known or unknown, associated with the Customer's decision to utilize Power Feeders described below to serve Customer's equipment located in the BellSouth Telecommunications, Inc. Central Office identified below:

Collocation Customer Name \_\_\_\_\_

Reference Number \_\_\_\_\_ Office CLLI Code \_\_\_\_\_

Street Address \_\_\_\_\_ City / State / Zip \_\_\_\_\_

### **Collocation Customer Chooses to Install Undersized Power Feeders**

"Undersized Power Feeders" is defined as any case where the ampacity rating of the overcurrent protection device is less than the maximum peak, List 2, or worst-case manufacturer stated drain for the Customer's equipment. BellSouth will permit Customer's certified vendor ("Vendor") to install undersized power feeders in the above referenced central office subject to the following conditions:

- 1) The certified engineering and installation vendor contracted by the Customer shall size the DC power conductors to meet cable sizing requirements per the latest issue of BellSouth Technical Reference TR-73503 "Central Office Engineering and Installation Guidelines", subject to an amended voltage drop requirement specified in this agreement. Specifically, the ampacity rating of the conductors shall meet or exceed the overcurrent protection device rating, and the voltage drop requirements set forth in TR-73503 are amended per this agreement for an ampacity of 67% of the rating of a fuse type protection device or 80% of the rating of a circuit breaker type protection device.
- 2) Collocation Customer acknowledges that it has chosen to install Power Feeders to his equipment and that such wiring creates an additional risk of loss or damage to Customer's service or property.
- 3) In the event that the overcurrent protection device, located in a BellSouth owned Battery Distribution Fuse Bay (BDFB) or power board, does activate (i.e., blown fuse or tripped circuit breaker), BellSouth will respond to the alarm condition and will attempt to restore Customer's service via replacement of the blown fuse with a fuse of equal ampacity rating or resetting the tripped circuit breaker. If the overcurrent protection device operates again, then the Customer will be provided an opportunity to reduce the power requirements before a second attempt to restore service. The Customer acknowledges responsibility for the alarm condition and agrees to compensate BellSouth for reasonable alarm response expenses. Under no circumstance will BellSouth replace the overcurrent protection device with a larger ampacity rated overcurrent protection device. Under no circumstance will the Customer be allowed to replace the overcurrent protection device with a larger ampacity rated protection device. If the Customer does replace the overcurrent protection device with a larger

ampacity rated device, the Customer acknowledges that such an act is willful misconduct and gross negligence, and the Customer acknowledges and accepts liability for any damage to BellSouth or other collocation customer's service, property, injuries, or death to personnel resulting from this action.

- 4) The Customer acknowledges and assumes the risk that a larger ampacity rated overcurrent protection device and associated power cable, if required, will result in the requirement for a new physical collocation application / inquiry.

By: \_\_\_\_\_

\_\_\_\_\_  
Collocation Customer (Print Name)

Authorized Signature

\_\_\_\_\_  
Title

Date \_\_\_\_\_



REQUEST: Please provide the number of Unbundled Copper Loops – Non-Designed (“UCL-ND”) ordered, by month, for 2001.

RESPONSE: The number of UCL-NDs ordered region-wide April through September, 2001, is shown below in the column labeled “Inward”.

<u>Month</u>	<u>In Svc</u>	<u>Inward</u>	<u>Outward</u>
April	1	1	0
May	1	0	0
June	2	3	2
July	97	97	2
August	119	23	1
September	148	31	2
<b>Total</b>	<b>148</b>	<b>155</b>	<b>7</b>

REQUEST: Please provide a comparison of UNE rates for line sharing and line splitting. Specifically, demonstrate when the UNE-P rate element is applicable and when the standalone UNE loop and UNE port elements are applicable.

RESPONSE: In response to this request, attached are the following:

1. An excerpt from BellSouth's SGAT that provides BellSouth's proposed rates for a UNE loop, a UNE port, a 2-wire cross connect, a loop/port combination (UNE-P), and various line sharing elements  
  
and
2. Diagrams illustrating various scenarios that occur when converting an end user customer to line sharing or line splitting. Where either line sharing or line splitting occurs, BellSouth has indicated the UNE elements and associated rates that would apply.

Diagrams 1-3 depict the following:

- BellSouth Retail Voice Service
- Conversion from BellSouth Retail Voice Service to Line Sharing with BellSouth Provided Splitter
- Conversion from BellSouth Retail Voice Service to Line Sharing with CLEC Provided Splitter

Diagrams 4-6 depict the following:

- CLEC Voice Service on BellSouth UNE-P
- Conversion from CLEC Voice Service on UNE-P to Line Splitting with BellSouth Provided Splitter
- Conversion from CLEC Voice Service on UNE-P to Line Splitting with CLEC Provided Splitter

Diagrams 7-9 depict the following:

- BellSouth Retail Voice Service
- Conversion from BellSouth Retail Voice Service to Line Splitting with BellSouth Provided Splitter
- Conversion from BellSouth Retail Voice to Line Splitting with CLEC Splitter.

REQUEST: Please provide a comparison of each state's parity results for June, July and August.

RESPONSE: Please see the attached exhibit which compares the state parity results from the Multi-State Summary (MSS) provided and filed by BellSouth in this proceeding. This exhibit summarizes all the results from the MSS based on BellSouth meeting or not meeting either the benchmark or parity standard for each measure at each disaggregated level. This allows BellSouth to produce a composite number to track overall progress improvement at a state level. As can be seen, Kentucky was ranked numbers 1, 2 and 6 over the three months compared in this report. It can be noted that the difference between Kentucky's 6th ranked result and the 1st ranked result for August is less than 1%. However, it is more important to note the continuous improvement BellSouth has made over this three month period for all the states in BellSouth's region. It is also important to realize that such ranking is less important than the actual range of results. The range of performance in August of 82.93% to 86.53% represents a total variance across the nine states of only 3.6%, so while one state is 1st and another 9th, all are performing well.

REQUEST: What is BellSouth's Kentucky MSS performance on the measures that correlate to the "Not Satisfieds" in the Third Party Test?

RESPONSE: The referenced "Not Satisfied" items were included in the KPMG final report to Georgia, filed in Georgia on March 20, 2001 and filed with this Commission on May 18, 2001, in Exhibit OSS-64 of Ron Pate's Direct Testimony. See Attachment 1 for a comparison which relates the "Not Satisfied" items with the relevant Kentucky performance data filed in this case for the months of June, July, and August.

KPMG conducted additional metric testing for the Georgia Commission and certain "exceptions" from this test, raised in the AT&T Norris testimony were addressed in Mr. Varner's rebuttal testimony. Staff questioned Mr. McElroy on these exceptions at the hearing. These exceptions are not related to the "not satisfied" items from the Third Party Test and per Mr. Varner's testimony do not affect the integrity of Kentucky's performance data. KPMG has recently filed an updated status report with the Georgia commission in these items which is attached for the Commission's information. (See Attachment 2)

REQUEST: Please provide 12 months of the internal network services ranking data.

RESPONSE: The Turf Performance Matrix Report referred to in the hearing as the network services ranking report is confidential and proprietary and is provided subject to the execution of an appropriate confidentiality agreement. Without waiving this confidentiality BellSouth states as follows:

The Turf Performance Report was not created to evaluate the regionality of BellSouth's Operation Support Systems. A good indication of that regionality is the fact that BellSouth is meeting from 82.93% to 86.53% of its wholesale performance measures across the nine states for August 2001 -- just a 3.6% variation across the region. Kentucky, ranked 6th, is only 0.76% off the best mark at 85.77% (see the response to Item No. 7). In addition, the network organization evaluates a subset of the wholesale measures, which run the greatest volume and are, in BellSouth's opinion, critical to CLEC operations, on a daily basis. For these measures Kentucky accomplishes even higher results (above 95%).

The Turf Performance Report is only useful when one understands its intent and construction. The Report ranks the thirty seven network operations districts on fifteen measures (one measure is under construction, so current reports include only fourteen measures). Each measure has equal weight in the total ranking. This data is then summarized to rank eight BellSouth states and two regions in Florida resulting in 10 ranked regions. Rankings are done on year-to-date basis, and no comparison exists using 12 months of data as specifically requested by the Commission. The latest report available, September 2001, is attached which includes monthly results for 2000 and 2001 through September. However the rankings in the report are based on September 2001 year-to-date.

The fourteen measures fall into the following eight categories -- Safety, Installation and Maintenance, Construction, Engineering, Reliability, Service, Budget, and ADSL. The majority of the measures deal with cost/productivity and only five are direct service measures. Two of these measures focus on interexchange carriers (access customers), one of the

RESPONSE (cont.):

ADSL measures is focused on customers of Bellsouth's wholesale ADSL offering. The Network Report Rate and Service Quality Index measures focus on the installation and maintenance of all services. There are no specific CLEC measures included in this report.

The purpose of this report is to identify "best practices". In addition, the objectives are based on the previous years performance. In short, it is a tool for "raising the bar" on performance year over year. As a result, a high ranking (1 is "best", 10 is "worst") does not imply poor performance, only relative performance. Conversely, a low ranking implies better relative performance and therefore, identifies those districts and states that might have valuable information on doing the job right.

In January of 2001 Kentucky was ranked 3rd, in September of 2001 Kentucky was ranked 9th. The following is a summary of Kentucky's ranks for 2001.

<b>Measure</b>	<b>January Rank</b>	<b>September Rank</b>
Safety	7	7
I&M ITP	7	6
% Ineffective Dispatch	6	9
SSI&M ITP	4	3
Construction effectiveness	3	9
PF Rate	3	3
Residence Reinstall	7	6
Report Rate	3	5
SQI	4	5
CDDD	4	10
ICS - Average Duration	2	9
TOE/EAALIS	7	6
ADSL -- Sync Appt.	1	1
ADSL - Build out Variance	1	1
Total	3	9

A decline in rank does not imply a decline in performance, only less of an increase. For example, the three measures which have declined most significantly are telling.

RESPONSE (cont.):

For ICS - Average Duration, a measure of the average time to repair interexchange carrier access circuits, Kentucky has fallen from 2nd to 9th. However, the results range from 3.33 to 4.01 hours and Kentucky's September year-to-date performance was 3.73. Kentucky has improved this result 10% over year 2000 performance but other states have improved even more resulting in Kentucky's lowered rank. In addition, Kentucky has had two major cable cuts this year involving numerous access circuits which negatively influenced year-to-date results.

For Construction Effectiveness, a measure that is a product of utilization (which captures the amount of time that construction technicians are working on construction) and efficiency (the degree to which construction work is done in minimum work times), the ranking has changed from 3rd to 9th. The results range from 72% to 95% with Kentucky at 78%. Kentucky has added 54 Installation and Maintenance technicians this year and while those technicians were being trained, experienced construction technicians were used for installation and maintenance work. In short, Kentucky management made a conscious decision to favor installation and maintenance over construction for a short period. This result reflects that decision.

Finally, for ICS - Customer Desired Due Date - Specials, a measure of the percentage of orders for special access installed on or before the desired due date, Kentucky rank has changed from 4th in January to 10th in September. The results range from 93.77% (Kentucky's performance) to 98.19% with an objective of 90%. Therefore, every state is exceeding customer expectations. In fact, Kentucky's performance has improved from 91.27 in January to 93.77 year-to-date but again other states have improved even more.

In summary, Kentucky's wholesale performance is excellent and is only marginally included in the Turf Performance Matrix Report. The Turf Performance Matrix is an internal management tool to provide incentive for improved performance in the network districts. Focusing on the raw rankings in the Turf Performance Matrix Report without a complete understanding of the intent and content of the report can lead to inappropriate or incorrect conclusions about a state's or district's performance.

REQUEST: Please provide an explanation for the variance of unbundled network element revenues during the April through June, 2001, time period.

RESPONSE: In 2001, Interconnection Services had a significant effort to bill all customers for their second half billing on collocation for prior years 1999-2000. This effort resulted in billing showing up in the April- June time frame. See below for the impact of this billing effort.

	April	May	June
Total	\$ 2,498	\$ 3,992	\$ 94
Collocation	1,680	3,161	-759
Adjusted Total	818	831	853

(Numbers in 000s)