

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Investigation concerning the)	
Propriety of InterLATA Services)	
By BellSouth Telecommunications, Inc.)	CASE NO. 2001-105
Pursuant to the Telecommunications)	
Act of 1996)	

**SPRINT'S FIRST DATA REQUESTS AND INTERROGATORIES TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

Pursuant to the procedural directive of the Commission in the above referenced proceeding, Sprint Communications Company L.P. ("Sprint") now issues the following data requests and interrogatories to BellSouth Telecommunications, Inc. ("BellSouth" or "BST").

DEFINITIONS AND INSTRUCTIONS:

A. DEFINITIONS

1. "BellSouth" or "BST" means BellSouth Telecommunications, Inc., their subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, other representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.
2. "Sprint" means Sprint Communications Company, L.P., its subsidiaries, affiliates, agents, servants, attorneys, investigators, employees and ex-employees.

3. "Document" includes microfilm, letter, memorandum, policy, circular, minute book, telegram, chart, electronic mail, etc., and any other retrievable information in computer storage, which should be produced in printed form. BellSouth should specifically identify any instances where either withholds material because it does not consider the material to be a "document".

4. "Identify", "Identity", or "Identification" when used in reference to a document means to state the type of document (e.g., computer stored information, microfilm, letter, memorandum, policy, circular, minute book, telegram, chart, etc.) or some other means of identifying it, its present location and custodian, a description and the data on which it was made, prepared, or received. If any such document was but is no longer in BellSouth's possession or subject to its control, state what disposition was made of it, and if destroyed or disposed of by operation of a retention policy, state the retention policy. The term "identify" when used in respect to an individual means to state the person's full name, present position and business affiliation, the current business address, or if not known, the person's current home address and telephone number. The term "identify", when used with respect to a business entity means to furnish the business entity's name and address.

5. "Relate" or "relating" as used herein shall mean constituting, discussing, reflecting, embodying, evidencing, identifying, memorializing, mentioning,

substantiating, referring, or otherwise pertaining, in whole or in part, to the subject matter of the request.

6. The term “describe” when used in respect to an occurrence, event, activity or any other transaction means to provide a complete and detailed list of its nature, its time and place, and to identify the persons present and involved. The term “describe”, when used with respect to a document, means to provide a complete and detailed description of its nature and contents. The term “describe”, when used with respect to a communication other than a document, means to provide a complete and detailed description of its nature and contents.

INSTRUCTIONS

1. The obligation of BellSouth to respond to these data requests is ongoing. Accordingly, BellSouth promptly must provide additional information or documents when further information or documents responsive to these data requests are discovered.
2. In response to each data request, BellSouth shall restate the entire data request on an individual page preceding the information or document(s) responsive to that request.

3. If any document or information is withheld on the ground of privilege, BellSouth shall produce a log setting forth the date of the document, the author(s), the recipient(s), a summary of the document generally describing its contents, and the basis for the privilege asserted.
4. Identify each person who provided information used in answering each data request. Such information shall include the full name, present business address, occupation title, employer and organization for each such person, and indicate the information provided by each.
5. If you contend that any response to any data request is proprietary, Sprint agrees to sign an appropriate proprietary agreement with BellSouth. Please provide a copy of BellSouth's proposed confidentiality agreement to Sprint within three (3) business days of receipt of these data requests.
6. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information that is physically within Bellsouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

DATA REQUESTS AND INTERROGATORIES

1. Please produce all responses by BellSouth to the discovery requests of other parties in this docket and all documents produced by BellSouth in response to the discovery requests of other parties in this docket.

2. Please identify any and all BellSouth databases containing Loop Make-Up (“LMU”) information for Kentucky.

3. For each database identified in response to Request No. 2, please indicate whether competing local exchange carriers (“CLECs”) have access to the Kentucky LMU information contained in such databases, and the manner in which CLECs are provided access (e.g., electronic, etc.). If CLECs are permitted electronic access to the databases in question, please identify the BellSouth electronic interface (e.g., TAG, RoboTAG, LENS, etc.) through which electronic access is provided.

4. For each database identified in response to Request No. 2, please indicate the manner of access (e.g, electronic, etc.) that BellSouth personnel have to Kentucky-specific LMU information.

5. For each wire center associated with BellSouth’s Kentucky operations, please identify the percentage of loops by wire center for which LMU information is populated in BellSouth’s Loop Facility Assignment and Control System (“LFACS”) database.

6. For each wire center associated with BellSouth's Kentucky operations, please identify the percentage of loops by wire center for which LMU information is populated in the databases available to BellSouth personnel for obtaining LMU information.

7. Do CLECs operating in Kentucky have access to BellSouth's Corporate Facilities database, Loop Engineering Information System ("LEIS") database and Loop Engineering Assignment Data ("LEAD") system database? If so, please indicate the manner in which CLECs are permitted access (e.g., electronic, etc.). If CLECs are permitted electronic access to the databases in question, please identify the BellSouth electronic interface (e.g., TAG, RoboTAG, LENS, etc.) through which electronic access is provided. For purposes of this question, the "Corporate Facilities" database, the LEIS database, and the LEAD database means those databases, regardless of their names as used in Kentucky, that are identified and discussed on pages 67-77 of the North Carolina Utilities Commission's Recommended Order Concerning All Phase I and Phase II Issues Excluding Geographic Deaveraging, in Docket No. P-100, Sub 133d (issued June 7, 2001).

8. Do BellSouth Kentucky personnel have electronic access to BellSouth's Corporate Facilities database, LEIS database, and LEAD database?

9. Please identify and provide a copy of all BellSouth documents generated during the year 2000 and the current year to date that discuss CLEC access to LMU information in Kentucky.

Respectfully submitted this _____ day of July, 2001.

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