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January 21, 2003

Kentucky Public Service Commission
Mr. Thomas M. Dorman
Executive Director
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: *Inquiry into the Use of Contract Service Arrangements by
Telecommunications Carriers in Kentucky*
Case No. 2002-00456

Dear Mr. Dorman:

Enclosed for filing is the Response of AT&T to BellSouth's Motion for Reconsideration and Motion for Extension of Time.

I have also enclosed a copy to be stamped "filed" and returned in the enclosed, self-addressed, postage prepaid envelope.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/bb
Encl.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter Of:

INQUIRY INTO THE USE OF CONTRACT SERVICE)	
ARRANGEMENTS BY TELECOMMUNICATIONS)	CASE NO.
CARRIERS IN KENTUCKY)	2002-00456

RESPONSE OF AT&T TO BELLSOUTH'S
MOTION FOR RECONSIDERATION AND MOTION FOR EXTENSION OF TIME

AT&T Communications of the South Central States ("AT&T"), submits the following response to the "Motion for Reconsideration and Motion for Extension of Time" filed by BellSouth Telecommunications, Inc. ("BellSouth") in the above-captioned proceeding.

BellSouth, along with AT&T, has been directed by the Kentucky Public Service Commission ("the Commission") to participate in the above-captioned inquiry regarding the use of Contract Service Arrangements ("CSAs") by telecommunications carriers in Kentucky.

To initiate the proceeding, BellSouth and other carriers have been directed to provide certain information to the Commission by February 5, 2003. Such information is to include, among other things, "full and complete copies of all CSAs entered during 2001 and 2002" as well as specific information about each CSA. BellSouth estimates that this will require the filing of "approximately 780 contracts." Because of the voluminous nature of the requested material, BellSouth proposes instead to submit "a reasonable random sample of approximately 10 percent of the contracts." BellSouth also requests an extension of time of 45 days to file its response.

AT&T opposes allowing BellSouth, or any party, to file a random sample of CSAs rather than filing all CSAs entered into within a given period. A random sample may omit potentially significant information concerning the variety and terms of BellSouth's CSAs. Such a limited sample may also not be sufficient to indicate whether some customers are receiving service at

rates significantly more or less than other, similarly situated customers purchasing the same services.

At the same time, AT&T would submit that the use of a shorter time period will reduce the burden of compliance, while providing sufficient information for the proceeding. AT&T therefore suggests that, instead of submitting a random sample of CSAs from 2001 and 2002, BellSouth and the other parties should submit all CSAs entered into during the last twelve months, *i.e.*, February 1, 2002 through January 31, 2003. That would give the Commission complete and up-to-date information about the use of CSAs while substantially reducing the amount of filings required.

AT&T does not oppose granting BellSouth, as well as other parties, additional time to respond to the Commission's request for information. In light of AT&T's suggested reduction in the filing obligation in the proceeding, however, an extension until February 28, 2003 should give the parties sufficient time to respond to the Commission's request while not unreasonably delaying these proceedings.

Finally, AT&T has noted that the focus of the Commission's investigation appears to be on the use of CSAs by incumbent local exchange carriers and competitive local exchange carriers. As a predominately inter-exchange carrier, AT&T has some contracts with customers which apply only to long distance traffic and believes that the use of such contracts, which predates the 1996 Telecommunications Act, are outside the scope of this proceeding. Therefore, unless the Commission directs otherwise, AT&T will assume that the agency's request for information applies to contracts to provide, in whole or in part, local exchange telecommunications services and does not apply to a contract which solely concerns the provision of long distance service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 21st day of January, 2003.

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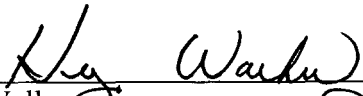
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