

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) 2002-0456

**AT&T'S RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
DATA REQUESTS TO ALL PARTIES**

Comes now, AT&T Communications of the South Central States, LLC and TCG Ohio, Inc. (AT&T) and responds to BellSouth Telecommunications, Inc.'s Data Requests to All Parties as follows:

1. Please identify each county within Kentucky where you currently provide local and/or intraLATA service (whether by resale, owned facilities, UNEs or otherwise).

RESPONSE:

AT&T provides intrastate service in Kentucky as set forth in its tariffs on file with the Kentucky Public Service Commission ("the Commission"). These are also located at <http://serviceguide.att.com/>.

2. Please identify which of the following service categories you provide in the counties you named in question 1.

Business and/or Residential Dial Tone Services of the type represented by the

following non-exhaustive list:

Plain Old Telephone Services (POTS)

Business Trunk Type Services

Primary Rate ISDN (PRI) and Basic Rate ISDN (BRI)

Centrex Type Services

Data Type Services of the type represented by the following non-exhaustive list:

IP Based Data Service

Packet Data Service

Primary Rate ISDN

Private Line Services

RESPONSE:

AT&T objects to the portion of this Data Request which inquires about residential services and IP/packet data services, on the grounds that it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence in this docket pertaining to contract service arrangements ("CSAs"). CSAs apply to business customers and are not offered to residential customers. The Commission does not regulate IP/packet data services. Any inquiry into residential services and IP/packet data services are therefore outside the scope of this docket.

With regard to the rest of the Data Request, as referenced in response to no. 1 above, AT&T's Kentucky intrastate tariffs are on file with the Commission and also are located

at the website listed. AT&T refers BellSouth to those tariffs for a complete description of the business services it offers in Kentucky.

3. Of the services you provide in Kentucky, what is the percent split by access lines between business and residential service?

RESPONSE:

AT&T objects to this Data Request on the grounds that it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. CSAs apply to business customers and are not offered to residential customers. The percentage split between business and residential service is outside the scope of this docket investigating CSAs. The Commission's Order dated December 19, 2002 ("Order") describes the following areas of inquiry in this docket: a focus on "pricing practices in regard to CSAs" (Order at page 2); an examination of "whether BellSouth and other carriers are providing services under CSAs when they should be providing service at tariffed rates" (Order at page 3); a consideration of "standards that should limit [the] use [of CSAs] and provide objective criteria for pricing services differently" (Id.); a consideration of "whether the existence of competition should be a factor in determining whether two customers are 'similarly situated' so that they are entitled to the same rate" (Id.); and an exploration of "the legal and policy implications of creating a special tariff for which only one unnamed customer, in fact, qualifies" (Order at page 4). Examination of these issues is not advanced by ascertaining the split between AT&T's business and residential customers.

4. Of the services you provide in Kentucky, what is the percent split by revenue between business and residential service?

RESPONSE:

AT&T objects to this Data Request on the grounds that it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. CSAs apply to business customers and are not offered to residential customers. The percentage split between revenues for business and residential service is outside the scope of this docket investigating CSAs. The Commission's Order dated December 19, 2002 ("Order") describes the following areas of inquiry in this docket: a focus on "pricing practices in regard to CSAs" (Order at page 2); an examination of "whether BellSouth and other carriers are providing services under CSAs when they should be providing service at tariffed rates" (Order at page 3); a consideration of "standards that should limit [the] use [of CSAs] and provide objective criteria for pricing services differently" (Id.); a consideration of "whether the existence of competition should be a factor in determining whether two customers are 'similarly situated' so that they are entitled to the same rate" (Id.); and an exploration of "the legal and policy implications of creating a special tariff for which only one unnamed customer, in fact, qualifies" (Order at page 4). Examination of these issues is not advanced by ascertaining the revenue split between AT&T's business and residential customers.

5. What percent of your customers purchase services from your company at your

filed tariff rates and conditions?

RESPONSE:

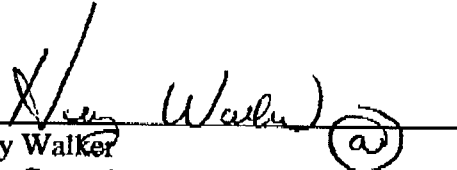
100%. All contract tariffs are filed at the Commission.

6. Does your company sell its services through a company sales force, agents, or both?

RESPONSE:

AT&T objects to this Data Request on the grounds that it is overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The methods AT&T uses to sell its services are outside the scope of this docket investigating CSAs. The Commission's Order dated December 19, 2002 ("Order") describes the following areas of inquiry in this docket: a focus on "pricing practices in regard to CSAs" (Order at page 2); an examination of "whether BellSouth and other carriers are providing services under CSAs when they should be providing service at tariffed rates" (Order at page 3); a consideration of "standards that should limit [the] use [of CSAs] and provide objective criteria for pricing services differently" (Id.); a consideration of "whether the existence of competition should be a factor in determining whether two customers are 'similarly situated' so that they are entitled to the same rate" (Id.); and an exploration of "the legal and policy implications of creating a special tariff for which only one unnamed customer, in fact, qualifies" (Order at page 4). Examination of these issues is not advanced by examining AT&T's methods for selling its services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", is written over a horizontal line. To the right of the signature, there is a small circle containing a lowercase letter "a".

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