

- REQUEST: BellSouth Telecommunications, Inc., ALLTEL of Kentucky, and Cincinnati Bell Telephone Company shall supply the following information for each wirecenter in their respective Kentucky service territories. The information requested shall be provided in a tabular format and contain, at a minimum, the following elements: (1) wirecenter CLLI code, (2) wirecenter/location name, and (3) exchange name.
- a. The total number of high-capacity (DS1 or greater) circuits that are
 - (i) provided at retail to end-users; and
 - (ii) supplied on a wholesale basis to CLECs for resale.
 - b. The total number of high-capacity (DS1 or greater) unbundled network element loops (UNE-L) leased by all CLECs.
 - c. The total number of high-capacity (DS1 or greater) UNE-L combined with UNE switching (UNE-P) leased by all CLECs.

- RESPONSE:
- a.
 - (i) BellSouth has attached responsive information. The attachment contains proprietary and confidential information subject to the execution of a Protective Agreement. However, the wirecenter/location name and exchange are not available for all entries in the attached data tables.
 - (ii) BellSouth has attached responsive information. The attachment contains proprietary and confidential information subject to the execution of a Protective Agreement. However, the wirecenter/location name and exchange are not available for all entries in the attached data tables.
 - b. As of 9/1/03, a total of 924 high-capacity (DS1 or greater) unbundled network element loops (UNE-L) are leased by CLECs in BellSouth's service territory in Kentucky, see attached.

RESPONSES (CONT.):

- c. As of 9/1/03, a total of 34 higher-capacity (DS1 or greater) UNE-Ls combined with UNE switching are leased by CLECs in BellSouth's service territory in Kentucky, see attached.

REQUEST: Each CLEC party that owns or controls local switching facilities used to provide high-capacity (DS1 or greater) circuits in Kentucky shall report, for each wirecenter in its Kentucky service territory, the total number of high-capacity (DS1 or greater) circuits that are (1) provided at retail to end-users or (2) supplied on a wholesale basis to other CLECs. The information requested shall be provided in a tabular format and contain, at a minimum, the following elements: (1) wirecenter CLLI code, (2) wirecenter/location name, and (3) exchange name.

RESPONSE: Not applicable to BellSouth.

REQUEST: The ILEC parties and CLEC parties shall provide the following:

- a. The aggregated annual (including annualized revenues for new customer accounts of less than one year) revenues generated from all customer accounts by wirecenter in the service area must be identified for those customers utilizing high-capacity switch (DS1 and higher) services. In calculating revenues, if there are revenues flowing to affiliated companies for other services such as wireless, data or Internet provision, identify and include these revenues in the aggregated revenue calculation for 2001, 2002 and year-to-date 2003.
- b. The annual revenue generated by the smallest (in terms of revenue and in number of lines) DS1 service customer account in each wirecenter in 2002 and year-to-date 2003.
- c. The number of DS1 service customer accounts and the aggregate revenue in each wirecenter which has been lost to competitors in 2001, 2002 and year-to-date 2003.
- d. The identity of known companies competing for DS1 service customers in each wirecenter for 2001, 2002 and year-to-date 2003.
- e. The guidelines used by sales representatives serving DS1 customer accounts to identify and acquire new customer accounts.
- f. The threshold criteria that define and characterize a customer who would benefit from either initially subscribing to DS1 services (new/start-up) or upgrading existing services to DS1 services.

RESPONSE:

- a. BellSouth is currently in the process of gathering this information. BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than November 21, 2003.

- b. BellSouth is in the process of investigating this request and will provide a supplemental response as soon as possible.
- c. BellSouth is in the process of investigating this request and will provide a supplemental response as soon as possible.
- d. BellSouth notes that this information is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007. Accordingly, BellSouth is filing a Confidentiality Petition, pursuant to KRS 61.878 and pertinent regulations, contemporaneously with these responses so that the Kentucky Public Service Commission may enter an appropriate order to protect the CPNI information.
- e. BellSouth Business Services' ("BBS") Sellers evaluate a number of customer and situation specific factors to determine if a customer has an appropriate fit for any of BellSouth's DS1 services. Factors would include the following: the amount and type of existing service, the type of existing or new equipment and it's network requirements, the availability of services based on customer location, the customer's current and future business requirements, etc. As a result, targeting of customers is done on an individual basis.
- f. BellSouth does not have a threshold criteria that defines and characterizes a customer who would benefit from either initially subscribing to DS1 services (new/start-up) or upgrading existing services to DS1 services. Customers generally make the decision to subscribe to new DS1 services or upgrade to DS1s based on many factors such as; the type CPE equipment they are using or the variable cost of DS1s versus multiple DSOs.