

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

**CINCINNATI BELL TELEPHONE COMPANY'S RESPONSE TO THE
COMMISSION STAFF'S FIRST SET OF DATA REQUESTS**

Cincinnati Bell Telephone Company ("CBT") hereby responds to the Commission Staff's First Set Data Requests dated October 10, 2003. The Data Requests were served on incumbent local exchange carriers ("ILECs"), including CBT, prior to the time that the Commission required the specified ILECs to file petitions seeking to overcome the national presumption of impairment with respect to mass market switching, loops or transport.¹ CBT did not file such a petition and is not challenging the national presumption of impairment for market switching, loops or transport at this time. Thus, the Commission will not be conducting an impairment analysis with respect to any of the markets in CBT's traditional Kentucky operating area at this time. For this reason, CBT does not believe that the information sought in Data Requests 1 through 4 is relevant to the current Commission proceeding or to Commission's analyses of other ILECs' markets. CBT provides only general responses to Data Requests 5 and 6 below.

¹ *Review of the Federal Communications Commission's Triennial Review Order Regarding Unbundling Requirements for Individual Network Elements*, Order, Case No. 2003-00379 (October 2, 2003).

- 1) For each corporate entity, including affiliates, for whom the ILEC is providing any type of collocation service, transport service, loop service, DS1 or greater switching service, DSO switching service, or interconnection service, provide the following information. In the response, distinguish those companies that are known to own and provide at least a portion of their own switching services from those entities that do not own or provide a portion of their own switching services.
 - a) The identity of the corporate entity, indicating whether the ILEC has any ownership or affiliate interest.
 - b) A list of all specific services (bundled or otherwise) for which the entity is billed by wirecenter, indicating whether the service is being provided on either a retail or wholesale basis.
 - c) The non-recurring and recurring prices of all bundled or individual services for which the entity is billed, indicating which are being provided on an unbundled basis. The rates in this response should correspond to the listed services provided in (b) above.
 - d) If different terms, conditions, or rates exist from published tariffs (i.e., by special contract), identify each term, condition, or rate differential for each service for each entity.
 - e) The total annual revenue generated (billed) for each entity.

Response:

Because CBT is not challenging the national presumption of impairment with respect to mass market switching, loops or transport in its Kentucky operating territory, CBT does not believe that the information sought from CBT is relevant to the Commission's impairment analysis with respect to other ILEC operating areas.

- 2) For each wirecenter containing a DSO type switch and serving the "Mass Market," provide the following information:
 - a) The total number of "Mass Market" customer accounts.
 - b) The total annual revenue generated from these accounts, including a breakout of Plain Old Telephone Service revenue, long distance revenue, wireless (phone and pager) revenue, Internet revenue, and all other revenue.
 - c) The number of customers and the revenue per customer account lost in 2002 and 2003 to a competitor. Identify the competitor.

Response:

See response to No. 1 above.

- 3) Identify each wirecenter for which "Mass Market" customers are being served by switches other than DS0 switches. Explain how these customers are being served.

Response:

See response to No. 1 above.

- 4) Provide a copy of the ILEC's most current Strategic Plan/Outlook for 2003 - 2006 pertaining to the "Mass Market" as defined by the FCC, including discussions of current and future market conditions, company reactions to potential and actual competitive entry, company market preservation and recapture strategies, and revenue projections.

Response:

See response to No. 1 above.

- 5) Explain whether or not a batch-cut migration process needs to be implemented by ILECs in the state. Identify any and all factors that warrant this conclusion.

Response:

CBT contends that a batch-cut migration policy is unnecessary in any of the Kentucky markets within its traditional service territory. Currently, no CLECs are purchasing the unbundled network element platform ("UNE-P") from CBT and the volume of UNE loop migrations is not sufficient to warrant a batch-cut migration process. Therefore, there is no need for a batch-cut migration process to transfer customer loops from CBT to a CLEC. If, in the future, the volume of UNE loop migrations increases significantly, the need for a batch-cut migration process could be revisited. However, CBT contends that without the need to migrate large volumes of UNE-P customers to UNE loops within its territory, CLECs are not impaired without a batch-cut migration process.

- 6) Assume that a batch-cut migration process will be implemented, and respond to the following:
- a) What is the appropriate volume of loops to be included in the "batch" and why?
 - b) Identify and explain the specific processes that should be employed when a batch cut is performed.
 - c) What type of completion interval metric should be used to monitor performance and why?
 - d) Identify and explain why any existing loop performance metrics should be expanded to account for a batch-cut process.
 - e) What are the appropriate TELRIC rates for the batch-cut activities?

Response:

CBT does not have experience implementing a batch-cut migration process. For this reason, CBT has insufficient knowledge to respond to this data request.

Respectfully submitted,

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