

**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
BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Cincinnati Bell Telephone Company ("CBT") hereby responds to BellSouth's Telecommunications, Inc.'s ("BellSouth") First Set of Requests for Production of Documents.

Response to Requests for Production of Documents

1) Produce all documents identified in response to BellSouth's First Set of Interrogatories.

Response:

No documents were identified in response to BellSouth's First Set of Interrogatories.

2) Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Kentucky.

Response:

No such business cases exist.

3) Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide qualifying service.

Response:

No such documents exist. CBT does not currently provide qualifying service in Kentucky.

- 4) Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you only provide qualifying service.

Response:

No such documents exist. CBT does not currently provide qualifying service in Kentucky.

- 5) Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide non-qualifying service.

Response:

CBT objects to this request for Production of Documents on the grounds that it is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to discovery of admissible evidence. CBT does not provide qualifying service in Kentucky and is not challenging the national presumption of impairment with respect to its Kentucky markets. CBT states generally that the calculation made in response to Interrogatory No. 29 is based upon the total regulated income for CBT's in-territory Kentucky operations divided by the number of end-user customers.

- 6) Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

Response:

No such documents exist. CBT does not currently provide qualifying service in Kentucky.

- 7) Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

Response:

No such documents exist. CBT does not currently provide qualifying service in Kentucky.

- 8) Provide all documents referring or relating to the classifications used by Company to offer service to end user customers in Kentucky (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

Response:

See Section 2 of CBT's General Exchange Tariff regarding the definition of residential and non-residential customers. The tariff is on file at the Commission's offices or available at <http://www.cincinnati-bell.com/corporate/>.

- 9) Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 34.

Response:

No such documents exist. See response to Interrogatory No. 34.

- 10) Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 35.

Response:

No such documents exist. See response to Interrogatory No. 35.

- 11) Produce all documents referring or relating to how Company determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

Response:

No such documents exist. See response to Interrogatory No. 40.

- 12) Produce all documents referring or relating to the typical or average number of DS0s at which Company would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

Response:

No such documents exist. See response to Interrogatory No. 40.

- 13) Produce all documents referring or relating to the cost of capital used by Company in evaluating whether to offer a qualifying service in a particular geographic market.

Response:

No such documents exist that specify the application of a methodology or specific cost of capital within a business case. Any evaluation of whether to enter a particular geographic market would require the preparation of a business case. Business case preparation is an informal and non-standardized process within the company. Therefore, the average cost of capital will change depending upon the risk of the opportunity and the length of the business case period.

- 14) Produce all documents referring or relating to the time period used by Company in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

Response:

No such documents exist that specify the application of a specific time period to a business case. Any evaluation of whether to enter a particular geographic market would require the preparation of a business case. Business case preparation is an informal and non-standardized process within the company. Therefore, the application of a given time period or planning horizon is not a formalized process and will change depending upon the risk of the opportunity and the type of service(s) that may be offered.

- 15) Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

Response:

Any evaluation of whether to enter a particular geographic market would require the preparation of a business case. Business case preparation is an informal and non-standardized process within the company. To estimate the sales expense for purposes of a business case, CBT personnel would pull data from customer information and reports databases located within CBT on an ad hoc basis. The criteria for extracting this information would depend on the type of service(s) that would be offered, an overall estimate of the risk of the opportunity (for sensitivity analysis), and the time period over which the business case would be applied (to establish the appropriate data planning horizon). Because this information is pulled "as-needed" to support various analyses on a case-by-case basis, no documentation exists that details estimates of sales expense.

- 16) Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

Response:

Any evaluation of whether to enter a particular geographic market would require the preparation of a business case. Business case preparation is an informal and non-standardized process within the company. To estimate the general and administrative (G&A) expenses for purposes of a business case, CBT personnel would pull data from customer information and reports databases located within CBT on an ad hoc basis. The criteria for extracting this information would depend on the type of service(s) that would be offered, an overall estimate of the risk of the opportunity (for sensitivity analysis), and the time period over which the business case would be applied (to establish the appropriate data planning horizon). Because this information is pulled "as-needed" to support various analyses on a case-by-case basis, no documentation exists that details formal estimates of general and administrative (G&A) expenses.

- 17) Produce all documents referring or relating to any complaints by Company or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

Response:

No such documents exist.

- 18) Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

Response:

CBT does not possess documentation with respect to the batch hot cut process used by any other ILEC in BellSouth's region.

- 19) Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

Response:

CBT does not possess documentation with respect to the individual hot cut process used by any other ILEC in BellSouth's region.

- 20) Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

Response:

CBT does not possess documentation with respect to the batch hot cut process used by any other ILEC outside of BellSouth's region.

- 21) Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

Response:

CBT does not possess documentation with respect to the individual hot cut process used by any other ILEC outside of BellSouth's region.

Respectfully submitted,

Ann Jouett Kinney
201 East Fourth Street
Room 102-890
Cincinnati, Ohio 45202
(513) 397-7260

Attorney for Cincinnati Bell
Telephone Company

Submitted: November 10, 2003