

REQUEST: At pages 25, 26 and 27 of Mr. Ainsworth's direct testimony in Florida Public Service Commission Docket No 030851-TP eight methods of unbundling loops that are currently served over IDLC facilities are identified. With respect to each such "alternative," please separately indicate:

- a. the percent of total current unbundled loops in the Company's operating area in the state of Kentucky that have been provisioned by the indicated alternative method;
- b. whether the alternative has the potential to negatively impact modem performance;
- c. whether unbundled loops provisioned by the indicated alternative are provisioned within 5 or fewer business days from the date of the original CLEC order;
- d. if the stated alternative results in provisioning intervals greater than 5 business days, please indicate the average number of business days in which such alternative is implemented;
- e. whether the stated alternative is provisioned such that modems are able to operate at the highest possible speeds available under the V.90 protocol;
- f. whether the stated unbundling alternative will necessarily limit modem speeds to V.34 – or lower – protocol.

RESPONSE: a. The data is not available to respond to this request.

b.

- Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair. If the sub-loop beyond the RT is non-loaded (practically all are non-loaded) and the physical copper feeder pair is loaded, the modem performance will be degraded. If the physical copper fed pair is non-loaded, modem performance should not be affected. Note, however, that the performance of modems varies from product to product and may be related to factors beyond BellSouth's control.

- Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier (“NGDLC”) systems, BellSouth will “groom” the integrated loops to form a virtual Remote Terminal (“RT”) arranged for universal service (that is, a terminal which can accommodate both switched and private line circuits). “Grooming” is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth’s network have “grooming” capabilities. This alternative will degrade the modem performance to the point that the modems must ‘fall back’ to V.34 mode.
- Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area (“CSA”). For two-wire ISDN loops, the universal digital loop carrier facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment. Transferring the pair to a Universal DLC will degrade the modem performance to the point that the modems must ‘fall back’ to V.34 mode.
- Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access (“INA”) systems or other existing IDLC that terminates on DCS equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC. This option will also involve an additional A/D conversion. V.90 modem performance will be degraded to the point that the modems must ‘fall back’ to V.34 mode.

- Alternative 5: When IDLC terminates at a peripheral capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC. While not stated explicitly, this alternative usually involves an intermediate channel bank, between the switch peripheral and the CLEC. In such an arrangement, V.90 modem performance will be degraded to the point that the modems must 'fall back' to V.34 mode.
- Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable. While not stated explicitly, this alternative usually involves an intermediate channel bank, between the switch peripheral and the CLEC. In such an arrangement, V.90 modem performance will be degraded to the point that the modems must 'fall back' to V.34 mode.
- Alternative 7: BellSouth will install and activate new Universal DLC ("UDLC") facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems. This option will also involve an additional A/D conversion. V.90 modem performance will be degraded to the point that the modems must 'fall back' to V.34 mode.
- Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC. This option will also involve an additional A/D conversion. V.90 modem performance will be degraded to the point that the modems must 'fall back' to V.34 mode.

- c. The provisioning interval for the unbundled loop alternative methods 1 through 6 are scheduled for provisioning as requested by the CLEC with the UNE-L interval guidelines and subject to the established provisioning measurements. This may or may not be a five (5)-business day provisioning interval depending on the CLEC's requested due date. Alternative methods 7 and 9 require special construction activity and provisioning schedules are determined based on construction completion dates.
- d. See BellSouth's response to subpart (c).
- e. See BellSouth's response to subpart (b).
- f. See BellSouth's response to subpart (b).

REQUEST: With respect to Alternative 2 identified on page 26 of Mr. Ainsworth's direct testimony, please provide all documentation, engineering manuals or diagrams explaining the "grooming" process. Please separately indicate whether this alternative has the potential to necessitate additional D/A or A/D conversions or otherwise affect modem performance.

RESPONSE: Grooming as described in Alternative 2 would be part of the provisioning process, which would have the potential for additional D/A or A/D conversion that could affect modem performance as explained in BellSouth's Response to MCI's Third Set of Interrogatories, Item No. 1(b). The documents responsive to this request are the same documents previously provided to MCI by BellSouth in response to MCI's First Set of Interrogatories, Item No. 124, in North Carolina Docket No. P-100, Sub 133q; and to the Kentucky Public Service Commission on a proprietary CD on December 22, 2003, at pages 1467-1770.

REQUEST: With respect to the re-terminate to "spare UDLC" equipment option included in Alternative 3 described at page 26 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the option.

RESPONSE: The documents responsive to this request are the same documents previously provided to MCI by BellSouth in response to MCI's First Set of Interrogatories, Item No. 124, in North Carolina Docket No. P-100, Sub 133q; and to the Kentucky Public Service Commission on a proprietary CD on December 22, 2003, at pages 1467-1770.

REQUEST: With respect to Alternative 4 described at page 27 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the alternative and separately indicate whether this alternative has the potential to necessitate additional A/D conversions or otherwise affect modem performance.

RESPONSE: Alternative 4 would involve an additional D/A or A/D conversion that could affect modem performance, as explained in BellSouth's Response to MCI's Third Set of Interrogatories, Item No. 1(b). The documents responsive to this request are the same documents previously provided to MCI by BellSouth in response to MCI's First Set of Interrogatories, Item No. 124, in North Carolina Docket No. P-100, Sub 133q; and to the Kentucky Public Service Commission on a proprietary CD on December 22, 2003, at pages 1467-1770.

REQUEST: With respect to Alternative 5 described at page 27 of Mr. Ainsworth's testimony, please provide all documentation, engineering manuals or diagrams explaining the alternative and separately indicate whether this alternative has the potential to necessitate additional D/A or A/D conversions or otherwise affect modem performance.

RESPONSE: Alternative 5 usually involves an intermediate channel bank between the switch peripheral and the CLEC, which would result in an additional D/A and A/D conversion that could affect modem performance as explained in BellSouth's Response to MCI's Third Set of Interrogatories, Item No. 1(b). The documents responsive to this request are the same documents previously provided to MCI by BellSouth in response to MCI's First Set of Interrogatories, Item No. 124, in North Carolina Docket No. P-100, Sub 133q; and to the Kentucky Public Service Commission on a proprietary CD on December 22, 2003, at pages 1467-1770.

REQUEST: With respect to Alternative 5 described at page 27 of Mr. Ainsworth's testimony, please describe the circumstances under which "side-door/hairpin" capabilities would not be available? And, indicate the percent of IDLC systems for which "side-door/hairpin" capabilities are not available.

RESPONSE: Side door/hairpin capabilities would be determined by switch type or equipment capacity. BellSouth estimates that 7.4% of its IDLC systems terminate in central offices where no "sidedoor/hairpin" capable switch peripherals exist

REQUEST: With respect to Alternative No. 6 at page 27 of Mr. Ainsworth's testimony, please provide a list of all wire centers (by CLLI) containing switch peripherals that are "not capable of side-door/hairpin functionality." For each such wire-center, please indicate in which CEA and rate zone the center resides.

RESPONSE: The following is a list of wire centers in which BellSouth has deployed IDLC equipment that does not contain switch peripherals that are capable of "side-door/hairpin" functionality:

EWSD

OWBOKYMADS1
HABTKYMADS0
MACEKYMADS0
PLRGKYMADS0
PNTHKYMADS0
SRGHKYMADS0
STNLKYMADS0
UTICKYMADS0
WHVLKYMADS0
WLVKYMADS0

5ESS

BRGNKYMADS0
CYDNKYMADS0
FDCKKYESDS0
MCWLKYMADS0
MGFDKYMADS0
PKVLKYGVDSD0
PRVLKYMADS0
RBRDKYMADS0
SLVSKYMADS0
STGRKYMADS0
STRGKYMADS0
SWSNKYMADS0
WLCKKYESDS0
WRFDKYMADS0

DCO

PARSKYMADS0
CRLSKYMADS0
CYNTKYMADS0
MYVLKYMADS0
MLBGKYMADS0
MTSTKYMADS0

REQUEST: Please indicate the average installation interval – measured in business days from receipt of a valid CLEC order – for all unbundled loops in the state of Kentucky that were provisioned under the eight enumerated alternatives described at pages 25 – 26 of Mr. Ainsworth testimony.

RESPONSE: The data is not available to respond to this request.

REQUEST: Please indicate the average installation interval – measured in business days from receipt of a valid CLEC order – for all unbundled loops in the state of Kentucky that were provisioned under the first six alternatives described at pages 25 – 26 of Mr. Ainsworth testimony.

RESPONSE: The data is not available to respond to this request.

REQUEST: For each of the eight enumerated alternatives included in Mr. Ainsworth's testimony please separately indicate the percent of unbundled loop currently provided to CLECs resulted in loops with copper portions:

- a. Less than 11,999 feet;
- b. Between 12,00 and greater than 14,999 feet
- c. Between 15,000 and 17, 999 feet;
- d. between 18,000 and 20,999 feet; and
- e. over 21,000 feet.

RESPONSE: The data is not available to respond to this request.

REQUEST: For each month of 2002 and 2003, please separately indicate the number of CLEC to CLEC, or UNE-P to UNE-P, migrations that took place throughout the Company's service area in the state of Kentucky.

RESPONSE: BellSouth does not retain the data necessary to provide the information to level of detail requested. Specifically, BellSouth's databases do not always reflect the former status of a particular facility. For example, a facility currently classified as a UNE-L line does not carry information reflecting whether that facility was formerly a Retail, Resale, UNE-P, UNE-L to another carrier, or a new installation as a UNE-L. Furthermore, a review of a sample of the data indicates that some lines may have been moved from one OCN/RESH (Other Company Name/Reseller Sharer) number to another where both numbers belong to the same CLEC. Nevertheless, with these qualifications, information responsive to this request is set forth in the following table:

UNE-P to UNE-P Migrations

<u>STATE Report Month Total Lines</u>		
KY	200201	3
KY	200204	2
KY	200205	1
KY	200207	12
KY	200208	145
KY	200209	269
KY	200210	338
KY	200211	318
KY	200212	289
KY	200301	358
KY	200302	493
KY	200303	592
KY	200304	1085
KY	200305	1221
KY	200306	1502
KY	200307	1708
KY	200308	2276
KY	200309	1972
KY	200310	2211

REQUEST: For each month of 2002 and 2003, please separately indicate the number of CLEC Resale lines that have been migrated, or switched to another CLEC's UNE-P throughout the Company's operating area in the state of Kentucky.

RESPONSE: BellSouth does not retain the data necessary to provide the information to level of detail requested. Specifically, BellSouth's databases do not always reflect the former status of a particular facility. For example, a facility currently classified as a UNE-L line does not carry information reflecting whether that facility was formerly a Retail, Resale, UNE-P, UNE-L to another carrier, or a new installation as a UNE-L. Furthermore, a review of a sample of the data indicates that some lines may have been moved from one OCN/RESH (Other Company Name/Reseller Sharer) number to another where both numbers belong to the same CLEC. Nevertheless, with these qualifications, information responsive to this request is set forth in the following table:

Resale to UNE-P Migration

STATE	Report Month	Total Lines
KY	200201	2
KY	200203	1
KY	200204	1
KY	200205	2
KY	200206	1
KY	200208	652
KY	200209	686
KY	200210	1141
R KY	200211	552
KY	200212	911
KY	200301	436
KY	200302	1256
KY	200303	1460
KY	200304	1031
KY	200305	1047
KY	200306	757
KY	200307	700
KY	200308	797
KY	200309	604
KY	200310	731

REQUEST: At page 4 of his Direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates "BellSouth has run force models to forecast the additional load necessary in the centers and in network operations if BellSouth receives relief from unbundled switching." Please provide all such model input, model output and working electronic copies of such models.

RESPONSE: The information responsive to this request is attached.

REQUEST: At page 9 of his Direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that the "model" includes the percent of IDLC in each central office." Please provide the percent of loops to be migrated – in aggregate – that BellSouth anticipates are currently provisioned via IDLC facilities and, therefore, must be unbundled as described by one of the enumerated IDLC unbundling alternatives in Mr. Ainsworth's Direct testimony.

RESPONSE: The information responsive to this request is contained in the attachment to BellSouth's response to Item No. 13 above.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in Kentucky. Please indicate whether BellSouth may hire additional central office employees in Kentucky and, if so, how many whether these same employees would be involved in the provisioning of Transport to and from CLEC collocation arrangements in Kentucky.

RESPONSE: BellSouth's model indicates the need to hire 89 central office employees in Kentucky. These employees would be involved in provisioning transport to and from CLEC collocation arrangements.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in Florida. Please indicate whether BellSouth may hire additional central office employees in Kentucky and, if so whether these same employees would be involved in the provisioning of EELs in Kentucky.

RESPONSE: BellSouth's model indicates the potential need to hire up to 89 central office employees in Kentucky. These employees may also be involved in provisioning EELS.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 687 central office employees in Florida. Please indicate whether BellSouth may hire additional central office employees in Kentucky and, if so, whether these same employees would be involved in the provisioning of collocation arrangements in Kentucky.

RESPONSE: Our model indicates the potential need to hire up to 89 central office employees in KY. These employees would not be involved in provisioning collocation.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in Florida. Please indicate whether BellSouth may hire additional installation and maintenance employees in Kentucky and, if so, how many and whether these same employees would be involved in the provisioning of Transport to and from CLEC collocation arrangements in Kentucky.

RESPONSE: BellSouth's model indicates the potential need to hire up to 30 installation and maintenance employees in Kentucky. These employees would not be involved in provisioning interoffice transport.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in Florida. Please indicate whether BellSouth may hire additional installation and maintenance employees in Kentucky an, if so, how many and whether these same employees would be involved in the provisioning of EELs in Kentucky.

RESPONSE: BellSouth's model indicates the potential need to hire up to 30 installation and maintenance employees in Kentucky. These employees would be involved with EEL provisioning that requires additional local loop facilities.

REQUEST: At page 10 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Heartley indicates that BellSouth may hire as many as 394 installation and maintenance employees in Florida. Please indicate whether BellSouth may hire additional installation and maintenance employees in Kentucky and, if so, how many and whether these same employees would be involved in the provisioning of collocation arrangements in Kentucky.

RESPONSE: BellSouth's model indicates the potential need to hire up to 30 installation and maintenance employees in Kentucky. These employees would not be involved with provisioning collocation.

REQUEST: Please indicate when BellSouth intends to begin hiring the employees described above and discuss the extent to which any or all of those employees will be trained on or before December 1, 2004.

RESPONSE: BellSouth anticipates that in the event unbundled switching relief is granted any migration of UNE-P to UNE-L would begin in August 2005. Based on that timeframe and depending on the actual volumes of lines being migrated from UNE-P to UNE-L, BellSouth would expect to hire any additional employees in December 2004 to allow for training.

REQUEST: At page 4 of his direct testimony in Florida Public Service Commission Docket No. 030851-TP, Mr. Milner described EELs and suggests CLECs can utilize BellSouth provided EELs in order to connect end users to CLEC switches. With respect to EELs as described in Mr. Milner's testimony, please provide the following:

- a. indicate whether BellSouth's procedures require CLECs to be collocated in more than one central office per LATA in which they purchase EELs;
- b. indicate whether BellSouth, when providing EELs, will provide for concentration such that multiple DS0 loops (served out of a single wire-center) can be aggregated onto a single DS1 transport facility;
- c. to the extent the answer to (b) above is "yes," please provide all relevant ordering and provisioning manuals, guides and other relevant documentation containing descriptions of the processes and procedures required to purchase such EELs;
- d. separately indicate whether – as part of the "individual hot cut," "project hot cut," or "batch hot cut" processes described in Mr. Ainsworth direct testimony - CLECs can convert UNE-P lines to unbundled loops utilizing EEL connectivity in lieu of connecting loops via CLEC collocations arrangements;
- e. please indicate the number of DS0 loops provided by BellSouth in the state of Kentucky which are connected to transport such that they comprise EELs as described in Mr. Milner's direct testimony;
- f. with respect to any such DS0 loops identified in response to (e) above, please indicate whether the loop to transport cross connect occurs without the necessity of CLEC collocation in the office where the loops are connected to the transport facilities. To the extent that such cross connects occur without the necessity of CLEC collocation in the wire-center where such cross connect occurs, please indicate of the total number of DS0 loops described in response to (e) are of this variety.

RESPONSE:

- a. BellSouth's procedures do not require CLECs to be collocated in more than one central office per LATA in which they purchase EELs.
- b. BellSouth offers DS1 Channelization (DS1 to DS0) multiplexing which may be used to aggregate multiple DS0 loops onto a single DS1 transport facility.
- c. A description of EEL configurations and coding necessary for ordering are contained within Unbundled Dedicated Transport - Ordinarily Combined UNE Combinations CLEC Information Package on BellSouth's web site in the Local Ordering Handbook at:
http://interconnection.bellsouth.com/guides/unedocs/udt_new_combo.doc
- d. While BellSouth does not have a special hot cut process to convert UNE-P lines to EELs, the work steps are the same as for UNE-P to UNE-L conversions. Once the interoffice transport facility has been pre-provisioned, BellSouth will perform the hot cuts to EELs using the same process that is used for UNE-P to UNE-L conversion.
- e. 7.
- f. For the EELs discussed in response to Part (e) above, 100 percent were provided without the "necessity of CLEC collocation in the office where the loops are connected to the transport facilities".

REQUEST: Has BellSouth determined in which markets in Kentucky the self provisioning triggers described by the FCC have been met or in which CLECs otherwise are not impaired without access to unbundled local switching due to the potential for competitive entry. If so, identify each such market, and, with respect to each such market identify by wire-center the number of such UNE-P lines that are being provided.

RESPONSE: BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

REQUEST: If BellSouth has identified any markets described in response to 23, please provide the aggregate number of UNE DS0 Loops BellSouth currently provides CLECs.

RESPONSE: See BellSouth's response to Item No. 23.

REQUEST: If BellSouth has identified any markets described in response to 23, please provide the aggregate number of UNE DS0 Loops BellSouth currently provides CLECs.

RESPONSE: See BellSouth's response to Item No. 23.

REQUEST: If BellSouth has identified any markets described in response to 23, please provide the aggregate number of UNE DS0 Loops BellSouth currently provides CLECs.

- a. BellSouth wire-center CLLI;
- b. CEA (as the term is used by Dr. Aron and Ms. Tipton) in which the BellSouth wire-center resides;
- c. rate zone in which the BellSouth wire-center resides;
- d. identify whether the "self provisioning" trigger (discussed in Ms. Tipton's testimony) or the potential for competitive entry (discussed in Dr. Aron's testimony) supports BellSouth's claim that carriers are not impaired in that particular BellSouth wire-center;
- e. number of retail DS0 lines currently provided by BellSouth in the identified BellSouth wire-center;
- f. number of UNE-P DS0s provided to CLECs in the identified BellSouth wire-center;
- g. number of DS0 UNE Loops provided by BellSouth to CLECs in the identified wire center;
- h. number of CLECs to whom BellSouth is currently providing UNE loops (without unbundled local switching) in the identified BellSouth wire-center;
- i. number of active CLECs to whom BellSouth is currently providing collocation in the identified BellSouth wire-center;

REQUEST: (Cont.)

- j. number of CLECs to whom BellSouth is currently providing UNE-P (combined UNE Loops and Unbundled Local Switching) in the identified BellSouth wire-center;
- k. number of DS0 loops cross connected to transport without collocation (i.e. EELs) provided in the identified BellSouth wire-center; and
- l. number of DS0 EELs provided with concentration in the identified wire-center

CLLI	CEA	Rate Zone	Trigger or Potential	Retail DSOs	UNE-P DS0s	DS0 UNE-Loops	Number of DS-0 UNE-L CLECs	Number of operating Collocators	Number of UNE-P CLECs	Number of DS0 EELs	Number of DS0 EELs with Concentration
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RESPONSE: See BellSouth's response to Item No. 23.

REQUEST: Produce all documents identified in response to each interrogatory in MCI's Third Set of Interrogatories to BellSouth. In producing documents, please identify and group documents by each individual interrogatory number.

RESPONSE: BellSouth has no responsive documents.