

REQUEST: Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by BellSouth) to a Line Splitting over UNE-L loop (where the splitter is owned by BellSouth)? If the answer to this data request is "yes,"

- a. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
- b. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 1 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

- REQUEST: Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by a CLEC) to a Line Splitting over UNE-L loop (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
- c. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
 - d. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 2 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

- REQUEST: Has BellSouth developed a hot-cut process to migrate a single Line Splitting over UNE-P loop (where the splitter is owned by BellSouth) to a Line Splitting over UNE-L loop (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
- e. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
 - f. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 3 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

- REQUEST: Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by BellSouth) to a Line Splitting over UNE-L loops (where the splitter is owned by BellSouth)? If the answer to this data request is "yes,"
- g. How many loops per day can the process accommodate in a single Central Office?
 - h. What training have BellSouth employees received to allow them to follow the process?
 - i. How many BellSouth employees have received such training?
 - j. In what percentages of Kentucky Central Offices are there BellSouth employees who have received such training?
 - k. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
 - l. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 4 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by a CLEC) to a Line Splitting over UNE-L loops (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"

- m. How many loops per day can the process accommodate in a single Central Office?
- n. What training have BellSouth employees received to allow them to follow the process?
- o. How many BellSouth employees have received such training?
- p. In what percentages of Kentucky Central Offices are there BellSouth employees who have received such training?
- q. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
- r. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 5 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

- REQUEST: Has BellSouth developed a batch hot-cut process to migrate groups of Line Splitting over UNE-P loops (where the splitter is owned by BellSouth) to a Line Splitting over UNE-L loops (where the splitter is owned by a CLEC)? If the answer to this data request is "yes,"
- s. How many loops per day can the process accommodate in a single Central Office?
 - t. What training have BellSouth employees received to allow them to follow the process?
 - u. How many BellSouth employees have received such training?
 - v. In what percentages of Kentucky Central Offices are there BellSouth employees who have received such training?
 - w. Has BellSouth developed the Operational Support Systems (OSS) necessary to allow CLECs to order this process electronically? If not, when does BellSouth expect to have the OSS necessary to allow CLECs to order this migration process electronically?
 - x. Describe the process in detail and identify what BellSouth documents, if any, describe the process and where those documents can be found.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 6 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

- REQUEST: If the answer to any of the Data Requests 1 through 6 is "no" or anything other than an unqualified "yes," for the process referred to in each such Data Request:
- a. When does BellSouth expect to have such a process ready for use by CLECs?
 - b. If the Data Request seeks information on a batch process, how many loops per day per Central Office do you expect the process to migrate?
 - c. When will the process have OSS associated with it that will allow electronically ordering by CLECs?

RESPONSE: On October 13, 2003, BellSouth filed an objection to Covad's Data Request No 7 on the grounds that this discovery is not relevant to this docket and is not reasonably calculated to lead to the discovery of admissible evidence.