

REQUEST: Please state whether you have any affiliates that are serving mass market customers in Kentucky with the use of their own local circuit switches, or are offering wholesale local circuit switching service to customers serving DS0 capacity loops in Kentucky using their own switches. If your response is affirmative, please identify each such affiliate. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1). For the purpose of this request the term "identify" means to state the full name, address and telephone number of the entity and any names under which it conducts business.

RESPONSE: BellSouth objects to this data request to the extent that it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules of discovery.

BellSouth also objects to Request No. 1 on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

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REQUEST: For each switch you use to provide local service to Kentucky customers, please provide the following information for the switch and/or the switch location:

- (a) common language location identifier ("CLLI") code;
- (b) V&H coordinates;
- (c) Street address;
- (d) Switch manufacturer and model;
- (e) Currently loaded version of switch software;
- (f) Current equipped line side capacity in DS-0/voice grade equivalents
- (g) Current utilized line side capacity in DS-0/voice grade equivalents;
- (h) Current switch processor capacity in CCS;
- (i) Busy hour and busy season utilized switch processor capacity in CCS.

RESPONSE: See Attachment. **This file contains BellSouth proprietary data.**

- (h) Processor capacity is not measured in terms of CCS. It is based on a combination of call attempts, holding times, feature mix, signaling requirements, software generic, and other factors. Variations in any of these factors can change the call processing capacity. The spreadsheet includes processor high day capacity for hosts and standalone switches in calls as of 10/22/03. The remote call processing capacity and demand is included in the host call processing capacity and demand.
- (i) Processor capacity is not measured in terms of CCS. It is based on a combination of call attempts, holding times, feature mix, signaling requirements, software generic, and other factors. Variations in any of these factors can change the call processing capacity. The spreadsheet includes utilized processor high day capacity for hosts and standalone switches in calls 10/22/03. The remote call processing capacity and demand is included in the host call processing capacity and demand.

REQUEST: For each switch identified in response to Request 2 above, please provide the following information:

Switch CLI Code	Number of Loops Per Customer Premises	Total Number of Local Service Customers	Type of Customer	Number of Voice Only Customers	Number of DSL Only Customers	Number of Voice Plus DSL Customers	Number of Fax or Modem Customers	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	e.g. 50	
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100	e.g. 100	
	2		Residential					
	2		Business					
	3		Residential					
	3		Business					
	. . . (continue pattern as above)							
	18		Residential					
	18		Business					
	19-24		Residential					
	19-24		Business					
	one DS-1		Residential					
	one DS-1		Business					
	More than one DS-1		Business					

RESPONSE:

BellSouth objects to Request No. 3 on the grounds that it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to Request No. 3 to the extent that it may seek information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth.

BellSouth is providing responsive information in response to AT&T First Interrogatories, Item No. 56 for residential/business customers, and directs MCI to that response.

REQUEST: For each switch identified in your response to Request 2 that is not physically located in Kentucky, please state whether such switch also provides service to customers in the state in which the switch is located. If the answer is affirmative, please describe the manner in which the switch's capacity is divided or allocated between the two states.

RESPONSE: The switches physically located in Tennessee, which serve Kentucky customers, also serve Tennessee customers. The capacity for each of these switches is managed as a single entity, and is not allocated by state.

REQUEST: For each switch identified in your response to Request 2, please state whether you own the switch, or instead whether you have leased the switching capacity or otherwise obtained the right to use the switch on some non-ownership basis. If you do not own the switch,

- (a) state whether the entity owning the switch is an affiliate of yours;
- (b) identify the entity owning the switch and (if different) the entity with which you entered into an arrangement to obtain switching capacity;
- (c) identify the nature of the arrangement through which you obtained switching capacity;
- (d) provide a copy of the agreement through which you obtained switching capacity.

RESPONSE: All switches identified in Item No. 2 are owned by BellSouth.

REQUEST: For each switch you own or control and from which you offer or provide UNE-P to carriers that are not affiliated with you, to use to serve Kentucky customers, please provide the following information for the switch and/or the switch location:

- (a) common language location identifier ("CLLI") code;
- (b) V&H coordinates;
- (c) street address;
- (d) switch manufacturer and model;
- (e) current loaded version of switch software;
- (f) current configured line side capacity in DS-0 equivalents;
- (g) current utilized line side capacity in DS-0 equivalents;
- (h) current processor capacity in CCS;
- (i) busy hour and busy season utilized processor capacity in CCS.

RESPONSE: All switches identified in Item No. 2 Attachment provide UNE-P capability.

REQUEST: For each switch identified in response to Request 6 above, please provide the following information:

Switch CLLI Code	Number of Loops Per Customer Premises	Total Number of Local Service Customers	Type of Customer	Number of Voice Only Customers	Number of DSL Only Customers	Number of Voice Plus DSL Customers	Number of Fax or Modem Customers	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	e.g. 50	
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100	e.g. 100	
	2		Residential					
	2		Business					
	3		Residential					
	3		Business					
	. . . (continue pattern as above)							
	18		Residential					
	18		Business					
	19-24		Residential					
	19-24		Business					
	one DS-1		Residential					
	one DS-1		Business					
	More than one DS-1		Business					

RESPONSE:

BellSouth objects to Request No. 7 on the grounds that it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to Request No. 7 to the extent that it may seek information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth.

BellSouth is providing responsive information in response to AT&T First Interrogatories, Item No. 56 for residential/business customers, and directs MCI to that response.

REQUEST: For each CLEC and other carrier collocation arrangement in each BellSouth central office or wire center in Kentucky, please provide the following information, reported by CLLI code and street address:

- (a) name of CLEC or other carrier;
- (b) type of collocation arrangement (e.g. caged, cageless, virtual, etc.);
- (c) size of collocation arrangement;
- (d) amount of power (including both "A" and "B" DC feeds and AC power) supplied to the collocation arrangement;
- (e) number of 2-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (f) number of 4-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (g) all equipment installed in the collocation arrangement, including make, model, and total installed capacity for each piece of equipment;
- (h) type(s) of BellSouth transport connected to the collocation arrangement (e.g., special access, UNE transport, etc.);
- (i) capacity(ies) of BellSouth transport connected to the collocation arrangement (e.g., DS-1, DS-3, OC-3, etc., and number of circuits at each level of capacity);
- (j) all non-recurring and recurring charges for the collocation arrangement;
- (k) name(s) of other collocating carrier(s) to which this collocation arrangement is connected in this central office or wire center.

RESPONSE: BellSouth objects to Interrogatory No. 8 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also objects to Interrogatory No. 8 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business.



- (a) BellSouth is unable to provide this information because the names of specific collocating carriers in each central office (CO) and wire center (WC) are proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. The names of carriers are not relevant to this proceeding. However, BellSouth has provided the name and location of each BellSouth CO and WC in Kentucky that currently has at least one collocator in Exhibit No. 8-a.
- (b) BellSouth is unable to provide this information because the type of collocation arrangement (e.g., caged, cageless, virtual, etc.) each carrier has in a specific CO or WC is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. The type of collocation arrangement in each CO and WC is not relevant to this proceeding. However, BellSouth has provided the aggregate number of physical and virtual collocation arrangements for each CO and WC in Kentucky in Exhibit No. 8-b.
- (c) BellSouth is unable to provide this information because the amount of collocation space currently occupied by specific collocating carriers in each CO and WC is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers.

BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. The aggregate amount of collocation space currently occupied by carriers in BellSouth COs and WCs is provided in Exhibit No. 8-c.

Exhibit No. 8-c lists the approximate square footage of collocation floor space for each CO and WC in Kentucky in which there are currently collocators. BellSouth designates individual CO and WC floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space" until the carrier physically removes its equipment and the collocation arrangement is reduced or terminated.

- (d) BellSouth is unable to provide this information because the amount of power (including both "A" and "B" DC feeds and AC power) supplied to collocation space currently occupied by specific collocating carriers in each CO and WC is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. The aggregate amount of fused DC power (including both "A" and "B" feeds) that is being provided by BellSouth for collocation space currently occupied by carriers in BellSouth COs and WCs in Kentucky is approximately 4,300 amps per month. BellSouth is not providing any AC power directly to collocation space currently occupied by carriers in BellSouth COs and WCs in Kentucky.
- (e) BellSouth is unable to provide this information because the number of 2-wire cross connects directly provisioned from the

MDF to individual carriers' collocation arrangements in each CO and WC is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement.

The aggregate number of 2-wire cross connects directly provisioned from the MDF to the collocation arrangements in BellSouth COs and WCs is provided in Exhibit No. 8-e.

- (f) BellSouth is unable to provide this information because the number of 4-wire cross connects directly provisioned from the MDF to individual carriers' collocation arrangements in each CO and WC is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. Information rules and cannot be shared with other carriers. The aggregate number of 4-wire cross connects directly provisioned from the MDF to the collocation arrangements in BellSouth COs and WCs is shown in Exhibit No. 8-e.
  
- (g) BellSouth is unable to provide this information because the type of equipment installed by an individual carrier in each of its collocation arrangements is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. Furthermore, BellSouth does not have any information that would identify the make, model, and/or total installed capacity for each piece of equipment collocated by an individual carrier in its collocation arrangement. MCI would have to obtain this information directly from each collocater in Kentucky.

- (h) See attachment 8-h. This attachment contains BellSouth proprietary information.
- (i) The capacity of transport that is provided to a carrier's collocation arrangement is dependent upon the type of transport that is ordered by the collocator. A collocator would specify on its collocation application to BellSouth the number and type (2-wire, 4-wire, DS-1, DS-3, 2-fiber or 4-fiber) of connecting facility assignments (CFAs) that it needs for the collocation arrangement. BellSouth would then assign the requested number and type of CFAs during the provisioning of the collocation space and provide this information back to the collocator. After the collocation space has been turned over to and accepted by the collocator, the collocator could begin placing orders for the level of transport services it needed.

BellSouth is unable to provide the number of circuits cross connected to specific carrier's collocation arrangements in each CO and WC, because this information is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement. However, the aggregate number of cross connects by type of BellSouth transport that has been provisioned to the collocation arrangements in BellSouth COs and WCs in Kentucky is shown in Exhibit No. 8-i.

- (j) The total recurring billing for collocation-based services in Kentucky for calendar year 2002 was [REDACTED]. The total non-recurring billing for collocation-based services in Kentucky for calendar year 2002 was [REDACTED]. This is highly sensitive, proprietary information and is being provided pursuant to the terms of the parties' protective agreement.
- (k) BellSouth is unable to provide this information because the names of specific collocating carriers in each central office (CO) and wire center (WC) are proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. The names of carriers are not relevant to this proceeding.

BellSouth does not have information that reflects the number of co-carrier cross connects (where collocation arrangements of two different carriers in the same central office or wire center are directly connected to each other) that exist in each BellSouth CO and WC in Kentucky. BellSouth permits two collocators to directly cross-connect their collocation space in BellSouth's COs and WCs. If the two collocation spaces are not contiguous, then the collocators must employ a BellSouth Certified Supplier to run their cabling between the two collocation arrangements utilizing BellSouth's common cable support structure. If the collocator's equipment and the equipment of the other carrier are located in contiguous caged collocation space, the collocator may use its own technician to install a co-carrier cross connect between the equipment of both collocated carriers by constructing a dedicated cable support structure between the two contiguous cages.

REQUEST: For each BellSouth central office or wire center in Kentucky, please identify the amount of available unused collocation space, in terms of total square feet of space and type(s) of collocation for which available space can be used. Please identify each central office in which collocation space has been exhausted, or for which collocation space exhaustion is anticipated in the next 3 years, including the date of exhaust or expected exhaust.

RESPONSE: See BellSouth's response to AT&T's First Interrogatories, Item No. 40.

REQUEST: For each BellSouth central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, please provide the following information:

- (a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
- (b) the CLLI code, street address, and V&H coordinates, and owner(s) of the switch(es) to which such EELs are created;
- (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
- (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
- (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
- (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
- (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

RESPONSE:

BellSouth objects to Interrogatory No. 10 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also objects to Interrogatory No. 10 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business. BellSouth is providing certain information below. BellSouth has interpreted MCI's request as seeking information concerning loops and transport that terminate at collocation arrangements, as opposed to seeking information concerning loops and transport that are

connected by a CLEC at a collocation arrangement. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement.

- a. See response to (b) below.
- b. See attached.
- c. number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops is 5;
- d. number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops is none;
- e. number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio is none;
- f. number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops is none;
- g. number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio is none;
- h. number of such EELs that comprise DS-1 transport connected to DS-1 loops is 753;
- i. number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops is 24;
- j. number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio is none.



BellSouth Telecommunications, Inc.  
 Kentucky Public Service Commission  
 Case No. 2003-00379  
 MCI's 1<sup>st</sup> Data Request  
 October 10, 2003  
 Item No. 10b  
 Attachment

b Switch Owners, assuming the transport owner and the switch owner are the same

CLLI	V Coord	H Coord	Address	Transport Owner
BNTNKYMA	0	0	101 E 13TH ST	
BRTWKYES	0	0	103 E MURR AV	
BRTWKYES	0	0	103 E MURR AV	
BVDMKYMA	0	0	204 E THIRD ST	
CNCYKYMA	0	0	304 N. SECOND ST.	
DIXNKYMA	0	0	LEIPER ST	
EDVLKYMA	0	0	E MAIN ST	
FDVLKYMA	0	0	S SIDE MAIN ST	
FRFTKYES	0	0	1007 E MAIN ST	
FRFTKYES	0	0	1007 E MAIN ST	
FRFTKYMA	0	0	206 WASHINGTON	
HPVLKYMA	0	0	1210 S MAIN ST	
ISLDKYMA	0	0	115 E BROADWAY	
LGRNKYES	0	0	375 YAGER AVE RD	
LSVLKY26	0	0	623 S 26TH ST	
LSVLKY26	0	0	623 S 26TH ST	
LSVLKY26	0	0	623 S 26TH ST	
LSVLKYAN	0	0	411 EVERGREEN RD	
LSVLKYAN	0	0	411 EVERGREEN RD	
LSVLKYAN	0	0	411 EVERGREEN RD	
LSVLKYAN	0	0	411 EVERGREEN RD	
LSVLKYAP	6528	2773	526 ARMORY PL	
LSVLKYAP	6528	2773	526 ARMORY PL	
LSVLKYAP	6528	2773	526 ARMORY PL	
LSVLKYAP	6528	2773	526 ARMORY PL	
LSVLKYBE	0	0	4606 S 2ND ST	
LSVLKYBE	0	0	4606 S 2ND ST	
LSVLKYBE	0	0	4606 S 2ND ST	
LSVLKYBE	0	0	4606 S 2ND ST	
LSVLKYBR	0	0	2404 BARDSTOWN RD	
LSVLKYBR	0	0	2404 BARDSTOWN RD	
LSVLKYBR	0	0	2404 BARDSTOWN RD	
LSVLKYBR	0	0	2404 BARDSTOWN RD	
LSVLKYBR	0	0	2404 BARDSTOWN RD	
LSVLKYCW	0	0	6612 HWY 22 CRESTWD	
LSVLKYCW	0	0	6612 HWY 22 CRESTWD	
LSVLKYCW	0	0	6612 HWY 22 CRESTWD	
LSVLKYCW	0	0	6612 HWY 22 CRESTWD	

LSVLKYFC	0	0	6801 BARDSTOWN RD
LSVLKYFC	0	0	6801 BARDSTOWN RD
LSVLKYFC	0	0	6801 BARDSTOWN RD
LSVLKYHA	0	0	7601 RIVER RD HAR CK
LSVLKYHA	0	0	7601 RIVER RD HAR CK
LSVLKYHA	0	0	7601 RIVER RD HAR CK
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYJT	0	0	12050 TAYLORSVILLE R
LSVLKYOA	0	0	1138 MINORS LN
LSVLKYOA	0	0	1138 MINORS LN
LSVLKYOA	0	0	1138 MINORS LN
LSVLKYOA	0	0	1138 MINORS LN
LSVLKYSH	0	0	2201 AUBURN AV
LSVLKYSH	0	0	2201 AUBURN AV
LSVLKYSH	0	0	2201 AUBURN AV
LSVLKYSH	0	0	2201 AUBURN AV
LSVLKYSL	0	0	7500 TEMPSCLAIR
LSVLKYSL	0	0	7500 TEMPSCLAIR
LSVLKYSL	0	0	7500 TEMPSCLAIR
LSVLKYSL	0	0	7500 TEMPSCLAIR
LSVLKYSM	0	0	111 BAUER AVE
LSVLKYSM	0	0	111 BAUER AVE
LSVLKYSM	0	0	111 BAUER AVE
LSVLKYSM	0	0	111 BAUER AVE
LSVLKYTS	0	0	1616 S 3RD ST
LSVLKYTS	0	0	1616 S 3RD ST
LSVLKYTS	0	0	1616 S 3RD ST
LSVLKYTS	0	0	1616 S 3RD ST
LSVLKYTS	0	0	1616 S 3RD ST
LSVLKYVS	0	0	9501 DIXIE HWY
LSVLKYVS	0	0	9501 DIXIE HWY
LSVLKYVS	0	0	9501 DIXIE HWY
LSVLKYVS	0	0	9501 DIXIE HWY
LSVLKYWE	0	0	9100 WESTPORT RD
LSVLKYWE	0	0	9100 WESTPORT RD
LSVLKYWE	0	0	9100 WESTPORT RD
LSVLKYWE	0	0	9100 WESTPORT RD
MACEKYMA	0	0	E SIDE HWY 405
MRRYKYMA	0	0	300 N.SEVENTH ST.
MYFDKYMA	0	0	307 S EIGHT ST
PDCHKYLO	0	0	3134 OREGON ST
RSTRKYES	0	0	U S 31
SHVLKYMA	0	0	316 N EIGHT ST

REQUEST: For each BellSouth central office or wire center at which loops and transport are connected to form EELs *without* using collocation, please provide the following information:

- a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
- b) the CLLI code, street address, and V&H coordinates, and owner(s) of the switch(es) to which such EELs are created;
- c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
- d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
- e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
- g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
- j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

RESPONSE:

BellSouth objects to Interrogatory No. 11 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also objects to Interrogatory No. 11 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business. BellSouth will provide the CPNI protected information upon Order of the Commission or if served with a valid subpoena by a party who has signed the Protective Order and Agreement.

- a. See response to (b) below.
- b.

Switch Owners, assuming the transport owner and the switch owner are the same				
CLLI	V Coord	H Coord	Address	Transport Owner
LSVLKYAP	6528	2773	526 ARMORY PL	xxxxxxxxxxxxxxxxxxxx

- c. number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops is 2;
- d. number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops is none;
- e. number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio is none;
- f. number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops is none;
- g. number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio is none;
- h. number of such EELs that comprise DS-1 transport connected to DS-1 loops is 1;
- i. number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops is 12;
- j. number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio is none.