REQUEST: Please provide, in table format, the following information for each BellSouth host or remote CO in BellSouth's nine-state region:

(a) CLLI code;
(b) address;
(c) city or town;
(d) whether the CO is staffed full time (i.e., during regular business hours), part-time (and if so on what basis), or unstaffed; and
(e) whether the switch within the CO is a remote switch, and if so identify the associated host switch.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: Does BellSouth have a "bulk" hot cut process for moving UNE-P customers to UNE-L? If your answer is in the affirmative:

(a) Describe the most currently available process in detail.
(b) What are the dates the most currently available process was:
  (i) created;
  (ii) tested; and
  (iii) implemented.

RESPONSE: a) Yes. BellSouth does have a "bulk" migration process for moving UNE-P customers to UNE-L.

BellSouth's Bulk migration process is as follows:

1. A Bulk Notification form is sent from the CLEC to the BellSouth Project Manager (PM) to identify those UNE-P accounts to be converted to a UNE-Loop.
2. The PM reviews the form to determine if the accounts qualify for handling by the Bulk migration process and if the form entries are complete and appear accurate.
3. The PM sends the form to the Network Single Point of Contact (SPOC) to determine load variations, personnel availability and due date schedule to be applied to each of the Earning Account Telephone Numbers (EATN) accounts. The PM and Network SPOC will return the Bulk Notification form to the CLEC within the following time period based on the number of telephone number (TN) requests: 7 business days to return to the CLEC a form with up to 99 TNs and 10 business days to return a form with between 100 to 199 TNs. The Project Manager will negotiate the return interval for requests of 200+ TNs.
4. The Bulk Notification form that has now been updated to include due dates for each of the accounts will be returned to the CLEC via the PM.
5. The CLEC has three (3) business days to submit an accurate Mechanized Bulk Local Service Request (LSR) containing the accounts and due dates to BellSouth's Local Carrier Service Center (LCSC). The mechanized system will create individual service

RESPONSE (CONT.)

orders for each of the accounts that will be provisioned and completed.

6. The BellSouth Customer Wholesale Interconnection Network Services (CWINS) Center will advise the PM of any service orders that will not be completed on the due date.

7. The PM will advise the CLEC on current order status.

b) The Manual Bulk process was developed and rolled out on December 4, 2002. A Mechanized Bulk process was introduced March 24, 2003 to allow electronic ordering and discontinuance of the manual ordering process.

(i) The manual Bulk process was created by the product team during the 4th quarter 2002 and was implemented for manual processing on December 4, 2002. Mechanized processing was introduced March 24, 2003.

(ii) Other than User Acceptance Testing (UAT) for Operations Support System (OSS) Release 12.0, no formal process testing has occurred.

(iii) The manual Bulk process was implemented for manual processing on December 4, 2002 and mechanized processing was introduced and implemented on March 24, 2003

REQUEST: Has BellSouth's "bulk" hot cut process been subjected to testing, third-party or otherwise? If so, please provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.

RESPONSE: As part of its case development for presentation in response to the FCC's Triennial Review Order, BellSouth, at the direction of counsel, is evaluating how best to present its case regarding its' bulk hot cut process, and that may involve evaluations based on some sort of objective testing of the process both internal and external. No final decision has been made regarding such a presentation and no third party test has been conducted.

REQUEST: For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please provide the number of access lines transferred by BellSouth via:

(a) Any hot cut method;

(b) An individual hot cut method. For transfers made via this method please provide:
  (i) the total number of access lines transferred;
  (ii) the total number of BellSouth retail access lines transferred to UNE-L;
  (iii) the total number of UNE-P access lines transferred to UNE-L; and
  (iv) the total number of service resale access lines transferred to UNE-L.

(c) A bulk hot cut method. For transfers made via this method please provide:
  (i) the total number of batches transferred and the number of access lines transferred in each batch;
  (ii) the total number of batches of BellSouth retail access lines transferred to UNE-L and the number of BellSouth retail access lines in each batch of BellSouth retail access lines transferred to UNE-L;
  (iii) the total number of batches of UNE-P access lines transferred to UNE-L and the number of UNE-P access lines in each batch of UNE-P access lines transferred to UNE-L; and
  (iv) the total number of batches of service resale access lines transferred to UNE-L and the number of service resale access lines in each batch of service resale access lines transferred to UNE-L.

If BellSouth cannot provide this information on a daily basis, but can provide it organized by some other time period (e.g. week, month, or quarter), please provide in that format. If BellSouth can provide the information for some COs or categories and not other COs or categories, please provide for the categories available and explain why information on other categories or COs is not available.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: For what types of conversions to UNE-L does BellSouth require a field dispatch? For each month from August 2000 through August 2003, by CO, what percentage of orders converting service to UNE-L required a field dispatch?

RESPONSE: BellSouth dispatches on conversions where the existing facilities were unable to be re-used. (Example: The existing facilities are integrated carrier system and the loop requested is an SL1 non-designed loop.) Also, there are cooperative testing requirements to dispatch to the demarcation point at the time of turn up, even if no field work is required, such as is the case for the HDSL capable, ADSL capable and UCL-designed loops.

See attachment "FLPSC_Item5_102203.xls" for the dispatch percentages for the COs in each state in the BellSouth region for the period October 2000 through August 2003. Prior to that time, dispatch related data was not collected for conversions.

REQUEST: Does BellSouth have a policy or practice of limiting the number of COs in which bulk hot cuts may occur in a single day or night? If your answer is in the affirmative:

(a) Describe the policy in detail.

(b) Are limits established for a particular geographic area or areas within the BellSouth territory? If so, define the geographic areas for which such limits are established and explain the basis or reasons for these area definitions.

(c) Provide a detailed explanation for why these limits are being imposed.

RESPONSE: BellSouth does not have a policy to limit the number of COs in which bulk hot cuts may occur in a single day or night.

REQUEST: Does BellSouth have a policy or practice of limiting the number of bulk hot cuts or bulk hot cut projects that may occur in a single day or night? If your answer is in the affirmative:

(a) Describe the policy in detail.

(b) Are limits established for a particular geographic area or areas within the BellSouth territory? If so, define the geographic areas for which such limits are established and explain the basis or reasons for these area definitions.

(c) Provide a detailed explanation for why these limits are being imposed.

RESPONSE: BellSouth does not have a policy of limiting the number of bulk hot cuts or bulk hot cut projects that may occur in a single day or night.

REQUEST: Please provide the maximum number of lines that can be converted (per day) to UNE-L using:

(a) a "bulk" hot cut process per CO in BellSouth's nine-state region as a whole; and
(b) an individual hot cut process per CO in BellSouth's nine-state region.

RESPONSE:

a) BellSouth's bulk hot cut process is scalable depending on volumes.

b) BellSouth's individual hot cut process is scalable depending on volumes.

REQUEST: Please specify the geographic area and the number of simultaneous COs in a given day in which a project hot cut can be performed in COs throughout BellSouth's nine-state region.

RESPONSE: There are no specific restrictions placed on the number of simultaneous COs in a given day in which a qualified project hot cut can be performed in COs throughout BellSouth's nine-state region. Any limitations would be determined on a project-by-project basis and would depend on the size of the project(s).

REQUEST: Are there COs in which BellSouth has never performed a hot cut? If yes, please identify those COs by reference to the list provided in the response to Interrogatory No. 1.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: Provide the average time spent by BellSouth Central Office personnel who work directly on the Main Distribution Frame or other frames to conduct a single cutover on a single order, separated between each type or classification of cutover provided by BellSouth, including, but not limited to, "non-coordinated," "coordinated," "coordinated time-specific," or "bulk" cutovers, and explain how this was calculated.

RESPONSE: Presently, the average times spent by BellSouth Central Office personnel to conduct a single cutover for a non-designed SL1 loop on a single order are:

Activity	1st Loop (Minutes)	Additional Loops (Minutes)
non-coordinated cutover	30	21
coordinated cutover	40	23
coordinated time-specific cutover	50	25
bulk (with coordination) cutover	40	23

All of the times are based on Subject Matter Expert estimates.

In addition, see the response to Item No. 43.

REQUEST: Provide the average time spent by BellSouth Central Office personnel who work directly on the Main Distribution Frame or other frames to conduct multiple cutovers contained on a single order, separated between each type or classification of cutover provided by BellSouth, including, but not limited to, "coordinated," "coordinated time-specific," or "bulk" cutovers, and explain how this was calculated.

RESPONSE: See the responses to Item Nos. 11 and 43.

REQUEST: With regard to the current capacity of the individual or bulk hot cut process:

(a) Can it be increased, and if so, how?

(b) Does BellSouth have any current plans to increase the current capacity? If so, please describe such plans.

RESPONSE: (a) BellSouth's hot cut processes, whether bulk or individual, are scalable. Force modeling is used to determine resources needed to handle volumes.

(b) BellSouth does not have plans to increase the current capacity because volumes have not warranted such an increase.

REQUEST: For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please provide the number of UNE-P migration orders that have been completed by BellSouth.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: What is the maximum number of UNE-P migration orders that can be completed in a given work day in each of BellSouth's COs?

RESPONSE: As stated in Item No. 8(b), BellSouth's hot cut processes are scalable depending on volumes.

REQUEST: What is the maximum number of UNE-P migration orders in total that can be completed in a given work day in BellSouth COs in BellSouth's nine-state region?

RESPONSE: As stated in Item No. 8(b) and Item No. 15, BellSouth's hot cut processes are scalable depending on volumes.

REQUEST: For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please separately provide the number of interLATA and intraLATA PIC changes processed by BellSouth.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: What is the maximum number of long distance carrier changes that can be completed in a given work day in each of BellSouth's COs?

RESPONSE: BellSouth currently allows carriers 100 PIC changes per NPA per NXX in a given work day. Anything over that amount has to be coordinated. This number allows for regular service order activity to process to the switch in addition to the PIC changes.

REQUEST: What is the maximum number of long distance carrier changes in total that can be completed in a given work day in BellSouth's COs nine-state region?

RESPONSE: See response to Interrogatory Item No. 18.

REQUEST: Provide the number and percentage of DS0 level analog loops, by calendar year (for 2000-2003) and by CO (by applicable CLLI code), in BellSouth's nine-state region that are served by:

(a) IDLC arrangements;
(b) NGDLC arrangements;
(c) UDLC arrangements;
(d) Entirely on copper; and
(e) Total.

RESPONSE: Refer to Item No. 20 attachment. MUX ("multiplexer") Column refers to pairs connecting DS1 level loops.

REQUEST: Provide the number and percentage of access lines, by calendar year (for 2000-2003) and by CO (by applicable CLLI code) in BellSouth's nine-state region that serve:

(a) small business lines; and
(b) residential lines.

RESPONSE: (a) BellSouth has requested that AT&T define "small business lines." BellSouth is unable to respond to subpart (a) until it receives this clarification.

(b) BellSouth has attached responsive information. The information requested is not available for end of year 2000. Therefore, BellSouth is providing reports for the end of year 2001, end of year 2002 and 3rd quarter 2003. This information is proprietary and is being provided pursuant to the terms of the parties' protective agreement.

REQUEST: Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.

RESPONSE: BellSouth objects to providing this data on a regional basis to AT&T in this and other dockets. This information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Specifically, BellSouth has received objections from AT&T to providing similar revenue data on relevancy grounds. AT&T stated in response to discovery requests in Florida "the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient 'model' competitor* and not that of AT&T or any other *particular competitor*. As a result, discovery of AT&T's financial information or business plans will not lead to the discovery of admissible evidence in this proceeding." (AT&T response to Interrogatory 15, FPSC D. 030851). While CLEC specific data is relevant to any analysis the Commission may perform concerning the ability of a CLEC to deploy switches to serve mass-market customers, ILEC data is not relevant to this analysis. BellSouth anticipates filing a motion or motions to compel seeking the information AT&T has objected to produce because, its data is, at a minimum, discoverable for purposes of comparison to a model and/or hypothetical CLEC as well as for impeachment, as AT&T will no doubt seek to attack any inputs that BellSouth proposes. BellSouth notes that in Florida Docket No. 030851-TP, BellSouth provided to AT&T responsive information relating to residential lines based on data from BellSouth's retail billing records. This information was provided in good faith, prior to BellSouth's receiving AT&T's objections to providing similar information.

REQUEST: For the BellSouth access lines that are currently provisioned on IDLC/NGDLC technology as described in the response to Interrogatory No. 20 above, please state the percentage of such access lines for which BellSouth has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

RESPONSE: Refer to Item No. 23 attachment (column labeled "% compatible spares") to ascertain "parallel copper" and "UDLC facilities available for hot cut conversions."

REQUEST: Provide the number of access lines served by DLC as described in the response to Interrogatory No. 20 above for which alternative copper loop facilities are currently not available.

RESPONSE: Refer to Item No. 24 attachment.

REQUEST: Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number and percent of loops in BellSouth's nine-state region that BellSouth intends to serve via:

(a) DLC loop arrangements; and
(b) NGDLC loop arrangements.

RESPONSE: BellSouth does not develop forecasts by technology type. Forecasts are developed by service type. Current status of the serving arrangements in BellSouth's nine state region is provided below.

State	Copper	%	Universal DLC	%	Integrated DLC	%	Universal NGDLC	%	Integrated NGDLC	%
AL	1,272,655	64%	210,716	11%	417,795	21%	39,754	2%	51,488	3%
FL	3,396,599	51%	596,945	9%	2,347,424	36%	157,906	2%	100,872	2%
GA	1,826,598	44%	687,657	17%	1,286,512	31%	226,880	5%	104,767	3%
KY	854,806	68%	131,865	11%	199,620	16%	42,914	3%	26,635	2%
LA	1,810,481	76%	246,148	10%	272,920	11%	43,292	2%	24,205	1%
MS	868,943	62%	145,008	10%	336,113	24%	29,868	2%	21,064	2%
NC	1,321,278	52%	270,813	11%	845,471	33%	59,846	2%	43,291	2%
SC	827,067	55%	68,430	5%	604,242	40%	7,742	1%	8,216	1%
TN	1,617,081	59%	282,261	10%	703,448	26%	58,602	2%	59,289	2%
Total	13,795,508	56%	2,639,843	11%	7,013,545	29%	666,804	3%	439,827	2%

REQUEST: Please identify the number and percent of hot cut LSRs received by BellSouth in the last 12 months for which data is available that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system.

(a) If available, provide the information by month and by CO.
(b) Please explain how you calculated or estimated the percentage.

RESPONSE: See responsive document provided by BellSouth in response to AT&T's 1st Production of Documents, Item No. 5 in this Docket, for the percentage of conversions during the last 12 months that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system. From September 2002 until April 2003, the determination of a dispatch was based on the Routing Code used on the service order in SOCS. Starting in May 2003, the OCB field identifier (FID) is used to determine if a dispatch occurs. From September 2002 through August 2003, IDLC is identified in the Coordinated Cut Scheduling System (CCSS) by the CWINS technician when IDLC facilities are involved. The percentages in the attached file are based on the presence of both a dispatch and IDLC indication for each conversion.

REQUEST: Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to:

(a) UDLC; and
(b) spare copper.

RESPONSE: For any loop capable of being transferred from IDLC to UDLC or copper, the cost of performing this activity is built into the non-recurring charge for the loop itself; therefore, there is no additional charge for this activity. The Order Coordination function (i.e., hot cut) allows for a customer's circuit to be swung from an IDLC circuit to either a UDLC or copper circuit in 15 minutes or less.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?

(a) What percent of any fallout is returned to the CLEC for correction/resolution?
(b) What percent does BellSouth manually create in its OSS?

RESPONSE: BellSouth does not track information at the level of specificity requested in this interrogatory. The ordering process – and BellSouth's ability to track certain data items – is driven by the submission of the local service request (LSR) by a CLEC. The LSR specifies the service that is being ordered, but does not provide information as to the type of service that is being changed. Consequently, BellSouth cannot provide the data as requested.

However, in the attached data tables, BellSouth provides – for the timeframe July 2002 to August 2003, and by state and region – the percent of *total* CLEC UNE-L migration orders (regardless of the type of service being changed) that were fully mechanized and required no manual intervention in BellSouth's ordering systems. Further, the responses for items (a) and (b) above are contained in columns on each table.

Similar data for the August 2000 to June 2002 timeframe is not readily available. BellSouth created the July 2002-August 2003 data tables primarily by using disaggregated LSR information that is the underlying data for the BellSouth flow-through report provided monthly on the BellSouth PMAP website. Since July 2002, BellSouth has retained the disaggregated LSR information in an accessible online database.

While BellSouth retains monthly flow-through reporting information well back beyond July 2002 as required, access to the disaggregated LSR information used to create the flow-through reports prior to July 2002 is not available. That information is currently stored on magnetic tape, but it is not stored in a manner that allows extraction in a useable format without an extensive programming effort to develop special code.

RESPONSE (CONT.):

Due to many modifications that have taken place within BellSouth's OSS over the past several years – and the impacts to extraction capabilities – separate code would have to be written for each month's flow-through data in order to extract the disaggregated LSR data required to calculate pre-July 2002 percentages as defined on the tables.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name).

RESPONSE: BellSouth does not have for the provisioning systems information available to respond to this request.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth UNE-P to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?

(a) What percent of any fallout is returned to the CLEC for correction/resolution?
(b) What percent does BellSouth manually create in its OSS?

RESPONSE: See response to Interrogatory No. 28. The same data tables provided for Interrogatory No. 28 apply to this request, as do the reasons for BellSouth's inability to provide the level of specificity requested and the unavailability of data for the timeframe August 2000 to June 2002.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth UNE-P to UNE-L were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name).

RESPONSE: BellSouth does not have for the provisioning systems information available to respond to this request.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-P orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?

(a) What percent of any fallout is returned to the CLEC for correction/resolution?
(b) What percent does BellSouth manually create in its OSS?

RESPONSE: See response to Interrogatory No. 28. For the same reasons BellSouth cannot provide the information requested for migrations from specific services to UNE-L, BellSouth cannot provide similar information for migrations from specific services to UNE-P.

However, in the attached data tables, BellSouth provides – for the timeframe July 2002 to August 2003, and by state and region – the percent of *total* CLEC UNE-P migration orders (regardless of the type of service being changed) that were fully mechanized and required no manual intervention in BellSouth's ordering systems. Further, the responses for items (a) and (b) above are contained in columns on each table.

For the reasons cited in the response to Interrogatory No. 28, similar data for the August 2000 to June 2002 timeframe is not readily available.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-P orders were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name).

RESPONSE: BellSouth does not have for the provisioning systems information available to respond to this request.

REQUEST: To what extent does the flow-through for Interrogatory Nos. 28-33 above affect BellSouth's ability to increase the number of orders it can implement on a daily basis? Why or why not?

RESPONSE: Flow-through is applicable to ordering systems and not to provisioning systems. The ordering systems do not 'implement' orders, but rather receive CLEC local service requests (LSRs) and generate BellSouth service orders that the provisioning systems and processes implement.

With respect to the flow-through capability of the ordering systems for which this request seeks information, BellSouth's OSS are scalable, and are designed to accommodate both current and projected volumes of LSRs. (See, also, *Florida KPMG Third Party Test – Final Report, at Section TVV2* for confirming results of normal, peak and stress volume testing of BellSouth's ordering OSS)

With respect to the provisioning systems, BellSouth's systems are scalable.

REQUEST: Does BellSouth have in place a single LSR process to migrate UNE loops from (a) BellSouth to CLEC; (b) CLEC to BellSouth and (c) CLEC to CLEC for each of the following:

(a) voice service;
(b) data service; and
(c) voice and data service.

Please state whether the ordering process for each is fully electronic, partially electronic or manual.

RESPONSE:

(a)(c) BellSouth to CLEC

Because BellSouth does not use UNEs, including UNE loops, BellSouth assumes that this interrogatory is requesting information on the migration of an end user using BellSouth retail services to CLEC migrations.

The attached document, the Flow-Through Matrix, provides information responsive to this request, including whether the process is fully electronic, partially electronic, or manual, on the single LSR process to migrate end users from BellSouth to CLEC and CLEC to CLEC.

This document is also publicly available at BellSouth's performance measurements site: http://pmap.bellsouth.com/default.aspx

(b) CLEC to BellSouth

BellSouth does not use the Local Service Request (LSR) when it migrates a CLEC's end user to itself. The LSR is specific to CLECs. BellSouth issues service orders to migrate a CLEC's end user to BellSouth.

REQUEST: What processes does BellSouth have in place to handle orders that involve a CLEC using multiple vendors, e.g. a CLEC using one wholesale provider for switching and another for the loop, for its service arrangement? Is the ordering process fully electronic, partially electronic or manual?

RESPONSE: BellSouth's ordering processes would not be involved where one wholesale provider is providing switching and another wholesale provider is providing the loop. In the event BellSouth is the wholesale provider for either the switching or loop element, BellSouth's ordering processes (electronic, partially electronic or manual) in place for that element would apply.

REQUEST: If a CLEC uses one wholesale provider for switching and another for the loop, or otherwise uses multiple vendors in its service arrangement, does that service arrangement place any limitations, from BellSouth's perspective, on the CLEC's ability to use BellSouth's pre-ordering, ordering, and provisioning processes?

RESPONSE: No. BellSouth's pre-ordering, ordering and provisioning processes can be used for any BellSouth provisioned services (e.g., where BellSouth provides switching or the loop)

REQUEST: Please explain and list all system modifications made since 2000 that affect the flow through capabilities of the BellSouth OSSs used to process hot cut orders. Please explain and list all BellSouth OSS system modifications planned in anticipation of, and related to, the provisioning of bulk hot cuts.

RESPONSE: BellSouth assumes that this interrogatory is requesting information on the modifications to the ordering OSS that relate to Reqtype A (loop) and Reqtype B (loop plus LNP) loops. The following table shows the flow-through modifications that have been made since 2000.

Change Request Number	Description
0029	Ability to Submit Partial Migration of UNE Loops (ReqTyp A) manually & electronically
0030	UNE to UNE Migrations
0078	Ability to order Extended Loops (EELS) electronically.
0153	Electronic Ordering of CO Based Line Sharing
0160	Flow Through Change Request-REQTYP BB ACT P&Q for LOOP with LNP Orders
0215	Implement ability to migrate UNE to UNE Orders in Bulk
0322	Enhancements for Mechanized Line Sharing (CO Based)
0336	Do Not Require Carrier Identification Code (CIC) for REQTYP A, B, C, F & M
0359	Ordering for Unbundled xDSL Loops
0429	Enhanced Mechanized xDSL Ordering functionality: Capability to accept HDSL LSRs with REQTYP of B; capability to request Desired Frame Due Time (DFDT) for ADSL & HDSL.
0441	To provide business rules for mechanized Line Splitting
0461	Do a Facility Check on LSRs before returning the FOC in Florida and Tennessee
0541	Mechanization of Unbundled Copper Loop-Non Designed (UCL-ND)
0557	Electronic Ordering of Unbundled Digital UDC for REQTYP A, ACT of N & D. Add RCO tables for ACT of D, D, T, & W. Add LNA tables for D, C, & W

RESPONSE (CONT.)

Change Request Number	Description
0625	Drop DSL USOC (ADL11) Upon Conversion Without Receiving Manual Auto Clarification
0675	Add LNP Ordering to LENS
0707	Make RESID Optional on UNE-SL1 Non-Designed Loops. Applicable to REQTYP A, ACT of N and T only. NC Docket 100-P, 133D, fact 2c
0729	Allow the electronic ordering of 4-wire SL2 Loops.
1236	Do a facility check on LSRs before returning the FOC in North Carolina.

The following two change requests, CR0092 and CR0426, address modifications related to the provisioning of hot cut orders.

On August 27, 2000, as a result of CR0092, BellSouth implemented changes to its EDI interface to make the Coordinated Hot Cut (CHC) field prohibited and Desired Frame Due Time (DFDT) field optional for Service Level 2 (SL2) Designed Loops. This change did not apply to the ordering of Unbundled Copper Loops (UCL).

BellSouth issued change request CR0426 to update EDI, TAG, and LENS should be updated to synch with the Business Rules for Coordinated Hot Cut, Coordination of Service Due Time (CSDT), and Time Specific requests on REQTYP A, ACT of N. This change request is scheduled for Release 15.0 on February 8, 2004.

REQUEST: Please explain how BellSouth's performance conducting bulk hot cuts is measured under the currently effective SEEM Plan, identifying each provision in SEEM upon which BellSouth relies for its answer.

RESPONSE: BellSouth's performance in conducting the actual hot cut portion of the service order is captured via three measurements in the SEEM plan: P-7, Coordinated Customer Conversions Interval; P7A, Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval; and P-7C: and Hot Cut Conversions - % Provisioning Troubles Received Within 7 days of completed Service Order. Monthly performance results for these measurements are captured by PMAP and provided downstream to the PARIS application. PARIS is the system used to calculate required payments for BellSouth's measurements that are in the SEEM plan. Additionally, once the cutover is complete, the lines involved in the bulk hot cut process are included in all the other relevant measures in provisioning, maintenance & repair, billing etc., and are subject to penalties for any of these additional measures in the SEEM plan.

The provisions for these measurements are defined in the current Kentucky SQM. The Kentucky SQM document provides the Definition, Exclusions, Business Rules, Calculation, Report Structure, Data Retained, SQM Disaggregation – Analog/ Benchmark, SEEM Measure, and SEEM Disaggregation – Analog/Benchmark. Under Kentucky SEEM, if BellSouth misses the established benchmark for any of the measures in SEEM, there is a fixed amount that BellSouth will pay for the missed measure. For example, the required benchmark for P-7, Coordinated Customer Conversions Interval, is 95% within 15 minutes. If BellSouth only makes 93% within 15 minutes, it will pay penalties on 2% of the transactions (the difference between 95% and 93%). The amount paid for each transaction missed is reflected in the Fee Schedule of the Kentucky SEEM plan. Further description of the penalty calculation methodology is also contained in the current Kentucky SEEM plan.

REQUEST: Provide, for each individual CO, end office, and serving wire center:

(a) total collocation space;
(b) total collocation space currently occupied by carriers;
(c) names of carriers currently occupying collocation space;
(d) total collocation space held or occupied by carriers who are no longer operating; and
(e) total collocation space available for carriers.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 40 on the grounds that certain sub-parts seek information that BellSouth cannot disclosure under the FCC's Customer Proprietary Network Information rules, BellSouth is currently in the process of compiling responsive information for subparts (a), (d), and (e). Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: What is the maximum number of collocators at a remote terminal?

RESPONSE: There are many factors that must be considered to determine how many carriers could possibly collocate at a particular site. These factors include, but are not limited to:

(1) The size of BellSouth's easement at a particular remote terminal site.
(2) The size of the existing structure at a particular remote terminal site.
(3) The BellSouth telecommunications equipment that is in service at a particular remote terminal site.
(4) The proposed BellSouth telecommunications equipment planned for installation at a particular remote terminal site.
(5) The number of carriers already collocated at a particular remote terminal site.
(6) The amount of space being utilized by the collocators at a particular remote terminal site.
(7) The number of vacant bays that are available at a particular remote terminal site.

REQUEST: Provide the name(s) and title(s) of the person(s) responsible for writing and updating CO hot cut procedures, training, and job aids. Identify by name and title persons working on the task.

RESPONSE: Daniel E. Stinson, Specialist - Central Office Operations

REQUEST: Does BellSouth have logs, studies or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does BellSouth maintain such records (e.g. electronically, on paper)? In addition, please list each task for which completion time is logged or recorded in a study.

RESPONSE: The cost studies for the bulk hot cut process as defined in the UNE-P to UNE-L Bulk Migration document found in the CLEC Information Package are currently in progress and are not complete. Work times for these studies will be based on Subject Matter Expert estimates and logs, other supporting documents do not exist. BellSouth captures provisioning data for its hot cut performance in its monthly performance measurements. This data captures all hot cuts whether ordered via the individual process or the batch process.

REQUEST: In BellSouth's Ex Parte in FCC Docket 01-338, filed December 24, 2002, on page 7, a table sets forth BellSouth's calculation of the time required to convert the "Top 20 UNE-P wire centers" to UNE-L or EELs. Provide answers to the following questions regarding that table:

(a) How many technicians were planned to work per shift, per wire center, to accomplish these conversions?
(b) How many conversions were planned per technician, per shift in each of the twenty wire centers?
(c) What is the maximum amount of new migrations BellSouth would be able to complete during the 3 –9 months these conversions would take place?
(d) How many UNE-P customers exist in these 20 wire centers as of September 1, 2003?

RESPONSE: (a) The assumption was that each of the Top 20 UNE-P wire centers, shown on page 7 of BellSouth's December 24, 2002, ex parte, have large frames and that there would typically be 6 technicians working on the frame during the normal day shift, with a maximum of 12 technicians able to work on the frame at any given time. Two shifts were assumed (except for the HLWDFLPE wire center where some third shift work was assumed) per day, with 6 technicians performing cuts during the day shift and 12 technicians performing cuts during the night shift, for an average of 9 technicians per wire center per day.

(b) The number of conversions per technician per shift in each of the twenty wire centers works out to be approximately 11.5, which results in approximately 104 conversions per wire center per day. In HLWDFLPE, assuming some third shift work, the number of conversions per technician per shift is approximately 13, which results in approximately 156 conversions per day.

(c) BellSouth's process is scalable depending on volumes.

RESPONSES (CONT.):

(d) See Attachment for response to Item No. 44(d).

REQUEST: In the Affidavit of Kenneth L. Ainsworth and W. Keith Milner filed by BellSouth in Docket 01-388 on July 17, 2002, at Paragraph 41, BellSouth states that "…anywhere from 2 to 10 (or more) central office technicians may be at work simultaneously on the same MDF with no negative impact on productivity." With regard to that statement:

(a) Provide, by MDF and CO, the number of central office technicians that may work simultaneously on the same MDF with no negative impact on productivity.

(b) Quantify how frequently this number of technicians "may work simultaneously on the same MDF with no negative impact on productivity":

i. two
ii. three
iii. four
iv. five
v. six
vi. seven
vii. eight
viii. nine
ix. ten
x. more than ten

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: Describe the impact, if any, that moving the current volume of UNE-P traffic onto UNE-L will have on BellSouth's tandem network/interconnection trunks?

RESPONSE: If the UNE-P traffic was moved to UNE-L, there would be little impact on the overall amount of BellSouth's tandem network/interconnection trunks, assuming that the CLECs size their trunk groups using standard trunk traffic engineering methods. This would include establishing trunk groups to the end offices where there is sufficient traffic to justify a trunk group.

The traffic being generated on the UNE-P lines is currently being handled on the BellSouth trunk network. If the traffic were moved to UNE-L/CLEC switch, the demand on BellSouth's interoffice network would decrease. However, there would be a similar increase on trunks to the CLECs' networks.

For example, a CLEC UNE-P end user call that went from a BellSouth end office to another BellSouth end office would, under UNE-L, go from the CLEC switch to the BellSouth end office. Traffic would decrease on the trunk group from the BellSouth end office to the other BellSouth end office. However, traffic would increase on the trunk group from the CLEC switch to the other BellSouth end office

If the shift from UNE-P to UNE-L is done on a gradual basis, it would minimize costs and service problems for both the CLEC and BellSouth. As the traffic shifted, BellSouth would disconnect the excess quantities from its trunk groups. This, in turn, would provide the capacity to add to the CLEC trunk groups.

REQUEST: Describe the impact, if any, that moving the volume of UNE-P traffic discussed in BellSouth's response to Interrogatory Nos. 13, 15, and 16 onto UNE-L will have on BellSouth's tandem network/interconnection trunks?

RESPONSE: See response to Item No. 46.

REQUEST: Quantify any projected change in OSS charges anticipated with the implementation of a state approved batch hot cut process.

RESPONSE: BellSouth assumes this interrogatory requests information on the electronic and manual ordering charges, known as SOMEC and SOMAN. BellSouth has no current plans to change these OSS charges.

REQUEST: What processes does BellSouth have in place with regard to directory listings, E911 and LIDB when a UNE-P loop is migrated to UNE-L?

(a) Are there capacity constraints?
(b) What is the process for ensuring the accuracy of the records?

RESPONSE: Directory Listings: *BellSouth Local Ordering Handbook for CLECs*, located on the BellSouth Interconnection website, http://www.interconnection.bellsouth.com/guides/html/leo.html, describes the CLEC ordering process for directory listing, when a UNE-P loop is migrated to UNE-L.

a) There are no known constraints.

b) BellSouth uses normal quality reviews to ensure the accuracy of the records.

E911: *BellSouth Local Ordering Handbook, for CLECs*, located on the BellSouth Interconnection website, http://www.interconnection.bellsouth.com/guides/html/leo.html, describes the E911 process.

a) There are no known constraints.

b) CLECs are granted an extract of their E911 data annually for database reconciliation. The BellSouth Implementation Manager offering a yearly reconciliation of data sends a letter and extract request form to each company in the first quarter of the year.

Line Information Database (LIDB): When UNE-P is established, the line from the UNE-P SOCS generated service order flows into LIDB and is stored. When a request to migrate from UNE-P to UNE-L is received the UNE-P disconnect orders flow to LIDB and remove the line record.

RESPONSES (CONT.):

The CLEC can request his line and corresponding information be placed into LIDB, by e-mail or fax.

a) There are no capacity constraints.

b) Monthly audits against CRIS records are performed to ensure information is accurate.

REQUEST: Please identify any telecommunications companies (including ILECs or CLECs) that BellSouth has identified as being willing to provide, intending to provide, or currently making available wholesale unbundled local switching used in combination with unbundled analog loops obtained from BellSouth to CLECs.

(a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a wholesale provider.

(b) Has BellSouth identified any vendors, other than any telecommunications company that are willing to offer switching capabilities to CLECs? If the answer is "yes," please provide name, address, and telephone number of each identified vendor.

RESPONSE: BellSouth is in the process of identifying such telecommunications carriers. BellSouth anticipates identifying such carriers, at least in part, via discovery in this proceeding.

REQUEST: For each carrier listed in Interrogatory No. 50, please provide for each switch BellSouth claims provides a wholesale alternative:

(a) The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (e.g., stand-alone, host, or remote).

(b) For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office.

(c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch.

(d) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) provisioned to each collocation:
   i) Within the last 3 months;
   ii) Within the last 6 months; and
   iii) Within the past year.

(e) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) in-service at each collocation as of September 30, 2003.

RESPONSE: See Response to Interrogatory Number 50.

REQUEST: Identify by wire center in BellSouth's nine-state region each unaffiliated competitive switch provider that BellSouth asserts qualifies as a self provider and detail the basis upon which you believe such entity qualifies as a self provider, including the geographic markets within which each unaffiliated competitive switch provider is providing service and the product and customer markets reached by each unaffiliated competitive switch provider.

(a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a self-provider.

RESPONSE: See response to Interrogatory Item No 50.

REQUEST: For each carrier listed in Interrogatory No. 52, please provide for each switch BellSouth claims is used for self provisioning:

(a) The 11-digit Common Language Location ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG"), the vertical and horizontal ("V&H") coordinates of the switch from the LERG, and claimed function of the switch (e.g., stand-alone, host, or remote).

(b) For each applicable CLLI code: the associated LATA number; MSA number (if applicable); the V&H coordinates; the latitude and longitude (L&L) coordinates; the UNE loop rate zone; the special access density zone and whether interstate special access pricing flexibility is applicable for that end office.

(c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch.

(d) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) provisioned to each collocation:
   (i) Within the last 3 months;
   (ii) Within the last 6 months; and
   (iii) Within the past year.

(e) The number of loops, by type (i.e., analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc …) in-service at each collocation as of September 30, 2003.

RESPONSE: See Response to Interrogatory Item No. 52.

REQUEST: Identify any and all purposes for which BellSouth uses each of the following differentiations for operational, economic, or marketing purposes: (1) LATA; (2) wire center; (3) MSA; (4) disaggregated geographic area for performance measurement data collection and reporting; (5) entire state; (6) entire service area; and (7) other level of differentiation (specify).

RESPONSE: BellSouth uses differentiations for retail marketing purposes as follows:

(1) wire center – targeting of promotions/offers
(2) MSA – targeting of promotions/offers
(3) Entire State – promotions/offers
(4) Entire Service Area – promotions/offers
(5) Other –
    a. Class of Service - (i.e. residential or business customer, package or non-package customer, retention, reacquisition customer – promotions/offers)
    b. Industry Segments – large business sales
    c. Service Subscription – (i.e. Voice Mail customers)

From a wholesale Marketing perspective, BellSouth does not market on a geographic basis. However, BellSouth was granted pricing flexibility coincident with Price Cap relief in 1999 wherein a contract tariff could grant a carrier unique contract rates for specific services on a geographic basis.

Also, BellSouth differentiates by LATA and, in some states, by MSA for operational uses in interconnection agreements and billing.

BellSouth does not use the differentiations for economic purposes.

REQUEST: For the most recent quarter for which information is available, provide by applicable CLLI code the number of:

(a) Analog loops provided to competitive carriers with unbundled local switching (i.e., UNE-P lines);

(b) Analog loops provided to competitive carriers without unbundled local switching. (UNE-L); and

(c) The number of CLECs who are collocated in that wire center and indicate the number of such CLECs who currently have analog (copper) cross connection capability to the BellSouth MDF; and

(d) The number of small business lines (based on DSO/DS1 cutoff) and number of residential lines.

RESPONSE: (a) BellSouth is currently in the process of gathering this information for each CO in BellSouth's nine-state region. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

(b) See BellSouth's Response to Item (a) above.

(c) See BellSouth's Response to Item (a) above.

(d) To the extent this information is available, it has been provided in BellSouth's response to Interrogatory Item No. 21.

REQUEST: For the most recent quarter for which information is available, please provide by applicable CLLI code, the total number of retail access lines (voice grade equivalents) (VGEs) provided by BellSouth, as well as the number in each of the following categories:

(a) residential;
(b) business;
(c) Centrex;
(d) PBX;
(e) Public; and
(f) Small business premises with four or more analog switched lines.

RESPONSE: (a)-(e) Response is attached. This information is considered proprietary and is provided pursuant to the terms of the parties' protective agreement.

(f) BellSouth has requested that AT&T define "small business premises." BellSouth is unable to respond to subpart(f) until it receives this clarification.

REQUEST: Please list those wire centers that are in Special Access Loop Density Zone #1 pursuant to FCC regulations.

RESPONSE: See Attachment.

REQUEST: Do you have space for additional collocators in every wire center? List those wire centers in which you cannot accommodate at least 3 more collocators.

RESPONSE: Yes. See BellSouth's Response to Interrogatory Item No. 40(e).

REQUEST: Provide the number of EELs in service in BellSouth's nine-state region at the end of the most recent quarter for which such information is available, stated separately for:

a) EELs comprised of analog loops that are connected to analog transport;
b) EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
c) EELs comprised of DS-1 loops that are connected to DS-1 transport;
d) EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport; and
e) EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport.

RESPONSE: The number of EELs in service in BellSouth's nine-state region at the end of the most recent quarter (3Q03) for which such information is available, stated separately for:

a) 261 EELs comprised of analog loops that are connected to analog transport;
b) 11 EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
c) 23,062 EELs comprised of DS-1 loops that are connected to DS-1 transport;
d) 5,650 EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport; and
e) 11 EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport.

REQUEST: For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):

a) The CLLI of the tandem switch on which the end-office homes.

b) For the same period as the information provided in the previous question, please indicate whether you have enough end office and tandem switch ports available for each wire center to handle the traffic if all UNE-P lines were moved to CLEC switches?

RESPONSE: a) See Attachment for Item 60 (a).

b) See response to Item No. 46 for details.

REQUEST: Provide the number of EEL local connections, in DS-1 equivalents, by wire center for each quarter since the fourth quarter of 1999.

RESPONSE: See Item No. 61 attachment. There were no EELs in service from fourth quarter of 1999 until third quarter of 2000.

REQUEST: For the most recent quarter available, provide the:

a) Number of business premises with a single analog line;
b) Number of business premises with two analog lines;
c) Number of business premises with three analog lines;
d) Number of business premises with four analog lines;
e) Number of business premises with six analog line;
f) Number of business premises with seven analog lines;
g) Number of business premises with eight analog lines;
h) Number of business premises with nine analog lines;
i) Number of business premises with ten analog lines;
j) Number of business premises with eleven analog lines;
k) Number of business premises with twelve analog lines;
l) Number of business premises with thirteen analog lines;
m) Number of business premises with a fourteen analog line;
n) Number of business premises with fifteen analog lines;
o) Number of business premises with sixteen analog lines;
p) Number of business premises with seventeen analog lines;
q) Number of business premises with eighteen analog lines;
r) Number of business premises with nineteen analog lines;
s) Number of business premises with twenty analog lines;
t) Number of business premises with twenty-one analog lines;
u) Number of business premises with twenty-two analog lines;
v) Number of business premises with twenty-three analog lines;
w) Number of business premises with twenty-four analog lines; and
x) Number of business premises with more than twenty-four analog lines.

RESPONSE: BellSouth has attached responsive information. BellSouth is unable to confirm that the lines in each category are only analog. The lines do not include DS1 and higher bandwidth lines. Also, the information provided reflects only BellSouth retail data and does not include wholesale data. This information is proprietary and is being provided pursuant to the terms of the parties' protective agreement.

REQUEST: For the last quarter for which such information is available, provide by end-office (by applicable CLLI code):

(a) The CLLI of the tandem switch on which the end-office homes.

(b) The number of shared transport (i.e. transport used in conjunction with unbundled local switching) minutes originating from the end-office.

(c) The number of shared transport minutes terminating to the end-office.

RESPONSE: (a) See response to Item No. 60 (a).

(b)(c) It would be onerous and burdensome to produce the requested data since BellSouth does not have ready access to shared transport minutes data. To obtain an answer, BellSouth would have to analyze each end office and determine how may UNE-Ps there are in that end office. A percentage would be calculated and applied to all of the trunk groups, assuming that the UNE-P call distribution is homogenous across the BellSouth trunk network in that end office.

To do the work manually would require many hours of time just to download the traffic data. For example, in the Orlando, Florida, Sand Lake end office, it took 2 hours and 27 minutes to download traffic data for 96 trunk groups for a 7-day period. That example times 13 weeks in a quarter would equal 32 hours of work just for one end office. Since the aforementioned amount of time does not include applying formulas in the spreadsheet to analyze the data for validity and then summing the measurements, BellSouth estimates that time to be comparable to downloading the data.

BellSouth also estimated the cost to have software developed to retrieve the requested data. That cost is estimated to be $90,000 and take a month or more to implement.

REQUEST: For the same period as the information provided in the previous question, please provide:

a) The total number of interconnection trunks and interconnection minutes at each tandem, separated between:
   i) Originating trunks and the minutes carried by those trunks;
   ii) Terminating trunks and the minutes carried by those trunks; and
   iii) Two-ways trunks and the minutes carried by those trunks.

b) The total number of interconnection trunks and interconnection minutes at each end-office (by applicable CLLI code), separated between:
   i) Originating trunks and the minutes carried by those trunks;
   ii) Terminating trunks and the minutes carried by those trunks; and
   iii) Two-ways trunks and the minutes carried by those trunks.

c) The number of additional trunk terminations available on each tandem.

d) The number of additional trunk terminations available on each end-office.

RESPONSE: (a)(b) See response to Item No. 63 for details.

(c)(d) See Attachment. This information is Proprietary, and is valid as of 10/20/03.

REQUEST: Provide the number of loops, by calendar year and by central office (by applicable CLLI code), in BellSouth's nine-state region that are served by:

a) IDLC arrangements;
b) NGDLC arrangements;
c) UDLC arrangements; and
d) Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

RESPONSE: a), (b), (c) See response to Item No. 20 (a), (b), and (c).

d) BellSouth is unable to develop a response to this request without more information such as CLEC market share assumptions for specific central offices such that a route-by-route analysis can be completed.

REQUEST: Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in BellSouth's nine-state region that BellSouth intends to serve via:

a) IDLC loop arrangements; and
b) NGDLC loop arrangements.

RESPONSE: See response to Item No. 25.

REQUEST: Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements that have been provided to a CLEC:

a) With unbundled local switching; and
b) Without unbundled local switching.

RESPONSE: See Item No. 67 attachment. Attachment columns C and D refer to "With unbundled local switching." Attachment columns E and F refer to "Without unbundled local switching."

REQUEST: Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to:

a) UDLC; and

b) spare copper.

RESPONSE: See response to #27.

REQUEST: In BellSouth's nine-state region, please provide the current total number for BellSouth of:

a) Central Offices; and
b) Remote Terminals.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: During the past five years, has BellSouth ever added processor capacity or peripheral equipment to one or more of its local switches due to:

a) Increased usage; and

b) Exhaust of the number of end-user lines that could be connected to the switch?

RESPONSE:

a) Yes. BellSouth has added processor capacity and peripheral equipment due to increased usage in its local switches in the past five years.

b) Yes. BellSouth has added peripheral equipment due to the exhaust of the number of end-user lines that could be connected to BellSouth local switches in the past five years.

REQUEST: If the answer to either part of Interrogatory No. 70 above is yes, please identify:

a) The nature of the upgrade performed;

b) Whether BellSouth had other end-office switches within a 15-mile radius with capacity to handle additional lines;

c) If the answer to (b) is in the affirmative, state whether BellSouth considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If BellSouth did not consider doing so, why not?

RESPONSE: a) BellSouth's Switch Capacity Management group monitors all usage and capacity limiting items within BellSouth's switch network. The two primary reasons for adding equipment are exhaust of talking channels (usage based exhaust) and exhaust of one of the various types of terminations on the switch. Capacity is added proactively based on usage and/or termination requirements.

Over the past five years there have been substantial processor upgrades, notably the upgrade of the 5ESS processor to the 3B21, the XA-Core processor in some of BellSouth's larger DMS switches and the addition of processor elements as well as the replacement of the older processors in BellSouth's EWSD switches.

Peripheral additions include analog lines, TR-08 terminations, GR-303 terminations, BRI lines, PRIs and trunks. The utilization of each of these components is monitored and additional capacity is added as required. There have been hundreds of capacity additions to BellSouth's region-wide switches in the past five years.

There are also additional traffic sensitive components that vary by switch type (recorded announcements, metallic testing equipment, memory, etc.). These are monitored by Capacity Management and supplemented based on current utilization and projected requirements.

b) Given the density of BellSouth's switches in its nine-state region, it is likely that there was capacity in switches within a 15 mile radius in some of the projects described in (a) above.

RESPONSE (CONT.)

(c) BellSouth did not consider off-loading subscriber lines from the switch requiring capacity to a different local switch. This is not a strategy that has been pursued in managing BellSouth's switch network. The design of BellSouth's network is based on wire center boundaries and there are no mechanisms in place for transporting a large number of lines between switches.

REQUEST: What engineering guidelines and/or standards does BellSouth use to determine when, if ever, to serve customer lines from a switch other than the switch located at the customer's serving wire center?

a) Under what conditions, if any, would BellSouth consider serving lines from a switch other than the one located in the customer's serving wire center?

RESPONSE: BellSouth does not have engineering guidelines or standards for determination of when to serve customer lines from a switch other than the switch located at the customer's serving wire center. This is not a strategy that has been pursued in managing BellSouth's switch network.

a) BellSouth Basic Rate ("BRI") Integrated Services Digital Network ("ISDN") and Primary Rate ("PRI") ISDN customers can be served from a switch other than their serving wire center if the serving wire center is not provisioned for that service. An Alternate Network Serving Arrangement ("ANSA") is used in these wire centers to provide BRI or PRI lines from a nearby digital switch.

REQUEST: Please describe BellSouth's Fill at Relief ("FAR") guidelines for switching.

RESPONSE: BellSouth does not have defined "FAR" guidelines. In the current telecom environment, we are maximizing switch utilization while minimizing capital expenditures. The following define BellSouth's design criteria that are currently part of the Switch Capacity Manager's (SCM's") work instructions:

In the current environment (limited growth, significant spare equipment) the goal of the SCM will be to minimize capital expenditures. On all projects adding capacity, first choice will be to reallocate capacity within the switch and the second choice will be to move equipment from a switch with excess capacity. Third choice will be to acquire required plugs from PICS and/or obtain suitable reused equipment. The final choice will be to purchase capacity from the vendor.

The SCM should be aware of pending requirements in their switches and be planning how to obtain the required capacity at the least possible cost per the choices above.

If we are purchasing equipment and the forecast and/or trend predicts continued growth for the capacity we are adding our goal will be to provision one year of hard-wired equipment and six months of plugs. It is understood that not all peripherals in all switch types allow for this type of growth, however to the extent possible, we will follow this guideline.

BRI expenditures should be zero. Analog line expenditures should be minimal. TR08 capacity will not be provisioned in offices with spare analog lines unless there are extenuating circumstances (LMs, LU1s, floor space issues for COTs, etc.). GR303 will continue to be our major growth expenditure and OSPE should continue to deploy and utilize GR303 per their guidelines. Given the current trunk and PRI utilizations, any additions for trunks or PRI will come from excess capacity in other switches.

This design criterion is not meant to be all-inclusive. The SCM will need to continue to make the appropriate decisions (with input from the Area Manager and others) as to the best way to grow the network and spend related capital.

REQUEST: Does BellSouth currently provide any customer's local exchange service, other than for foreign exchange service, from a switch located at a place other than the customer's serving wire center? If yes, identify:

a) The wire centers and the number of affected lines at each of those wire centers.
b) The circumstances that caused BellSouth to offer service in this manner.
c) Any additional charges imposed on the customer for this serving configuration.

RESPONSE: Yes. See Attachment for responses to (a) and (b).

c) There are no additional charges.

REQUEST: In BellSouth's nine-state region, are BellSouth's Digital Loop Carriers ("DLC"; DLC shall include UDLC, IDLC, and NGLDC) partitionable? In answering this question, please use the following definition of "partitionable": capable of terminating digital facilities from one or more carriers on the network side of the DLC to provide access to the analog loops (or subloops) on the subscriber side and providing an out of band GR303 or comparable control protocol enabling two or more carriers to independently control the subscriber-side functionality for subscriber's voice grade UNE analog loops (or subloops).

a) If the answer to Interrogatory No. 75 is "yes", please provide the terms, conditions, and rates, if any, that BellSouth offers or plans to offer for access to BellSouth's DLCs in BellSouth's nine-state region as described in the previous question.

b) If the answer to Interrogatory No. 75 is "no", the please provide the following information:
   i) Does BellSouth intend or plan to partition DLCs (as defined in Interrogatory No. 75 in BellSouth's nine-state region?

RESPONSE: BellSouth has no Digital Loop Carrier systems in the nine-state region that are 'partitionable,' using the term as defined above. BellSouth does not intend or plan to 'partition' — again, using the term as defined above — any Digital Loop Carrier systems in the nine-state region.

REQUEST: If the answer to Interrogatory No. 75 is "yes", then please state the anticipated time frame in which BellSouth will offer partitioned at wholesale the DLC in BellSouth's nine-state region.

RESPONSE: Not applicable.

REQUEST: If the answer to Interrogatory No. 75 is "no", please provide a detailed explanation of why BellSouth does not intend to partition its DLCs in BellSouth's nine-state region. Please state any and all activities or steps that would be required in order for BellSouth to partition its DLCs in BellSouth's nine-state region.

RESPONSE: The vast majority of BellSouth's DLC systems in the nine-state region can accommodate only one interface, whether it be Central Office Terminal ("COT") to Remote Terminal ("RT") interface in the case of Universal Digital Loop Carrier ("UDLC"), or Local Switch to RT, in the case of Integrated Digital Loop Carrier ("IDLC"). There are some Next Generation Digital Loop Carrier ("NGDLC") systems, however, that can accommodate more than one such interface. These systems are presumed to meet the first requirement of a 'partitionable' DLC system provided in Interrogatory No. 75, i.e., they are "…capable of terminating digital facilities from one or more carriers on the network side of the DLC to provide access to the analog loops …."

It should be noted, though, that the definition of 'partitionable' provided in Interrogatory No. 75 includes another requirement, i.e., a "…control protocol enabling two or more carriers to independently control the subscriber-side functionality…." Clearly, in a 'partitionable' DLC system, some functionality would be needed to assign an analog loop on one side to a Local Exchange Carrier ("LEC") on the other side (although it is not clear how, or if, such functionality should be shared between LECs). Beyond such an assignment process, though, it is not clear what 'subscriber-side functionality' would be controlled in a 'partitionable' DLC system.

In summary, only a small percentage of DLC systems in the nine-state region even meet the first part of the definition of 'partitionable.' The 'control protocol' envisaged in the second part of the definition, though, is not in place.

REQUEST: Are there any customers being served via UNE-P today that could not be serviced via UNE-L such as for reasons of no copper to replace UDLC, etc.?

RESPONSE: See Item 24. BellSouth cannot answer this question as posed unless additional information, such as percent of customers CLEC anticipates acquiring and location of customers.

REQUEST: Please state any alternatives available to competitive local exchange carriers ("CLECs") or any other carrier to provide analog service (defined as "plain old telephone service") over unbundled loops where the analog loop terminates to a remote terminal or other outside plant location (defined as other than the Central Office) in BellSouth's nine-state region.

RESPONSE: Per the above request, CLECs can (1) provide service using UNE-P or resale of BellSouth's retail services, (2) provide their own loop feeder facility (or acquire such from a third party) and use BellSouth's unbundled subloop (or acquire such from a third party), or (3) in the case of loops served via Integrated Digital Loop Carrier ("IDLC"), can use BellSouth's unbundled voice loop, where it can be provided, using the following eight (8) alternatives:

Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

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.

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.

Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing

RESPONSES (CONT.):

Integrated Network Access ("INA") systems or other existing IDLC that terminates on Digital Cross-connect System ("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.

Alternative 5: When IDLC terminates at a switch peripheral that is 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.

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.

Alternative 7: BellSouth will install and activate new Universal Digital Loop Carrier ("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.

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.

REQUEST: Please identify any technological or operational alternatives to DLC partitioning (as defined in Interrogatory No. 75) that are currently available to CLECs or other carriers in BellSouth's nine-state region.

RESPONSE: If AT&T's intent is to obtain access to BellSouth's loop distribution pairs (copper sub-loops) at a BellSouth cross-box, then an alternative would be for AT&T to order Unbundled Sub-Loop Distribution ("USL-D").

REQUEST: If BellSouth identified any alternatives in the previous Interrogatory No. 80, do any of the identified alternatives involve placement of CLEC-owned DLC equipment, or the functional equivalent to DLC equipment, in an ILEC-owned Remote Terminal? If the answer is yes, please provide all terms, conditions, and rates that BellSouth would charge for a carrier to place DLC equipment in its remote terminal.

RESPONSE: The CLEC is not required to collocate DLC equipment to obtain access to the USL-D element. However, CLECs have the option of doing so if they desire.

If a CLEC placed its own DLC equipment, or the functional equivalent to DLC equipment, in a BellSouth Remote Terminal, the CLEC would be required to sign the BellSouth Standard Interconnection Agreement for Remote Site Collocation (Attachment 4), negotiate a Remote Site Collocation Agreement (Attachment 4) with BellSouth or request remote site collocation pursuant to the applicable State Commission approved Statement of Generally Available Terms and Conditions ("SGAT"). All of the rates, terms and conditions associated with BellSouth's Standard Interconnection Agreement, which includes the Remote Site Collocation offering (Attachment 4) can be found at the following BellSouth website:

http://www.interconnection.bellsouth.com/become_a_clec/html/ics_agreement.html

BellSouth's SGATs, which contain the rates, terms and conditions for Remote Site Collocation under Attachment 4, are public documents that can be accessed by AT&T from each State Commission's website.

REQUEST: In BellSouth's nine-state region, please provide BellSouth's long-term projection (i.e., next 5 years) of the anticipated percentage of the analog loops identified in Interrogatory No. 75 that will terminate in the Central Office without passing through BellSouth's DLCs.

RESPONSE: Please refer to response to Item No. 75 regarding existing copper loop capacity which BellSouth assumes is what Item No. 82 refers to as loops that will "terminate in the Central Office without passing through BellSouth's DLCs." BellSouth is unable to provide a response to this item as no "analog loops" are identified in Item No. 75.

REQUEST: In BellSouth's nine-state region, please identify, by name and location, any of BellSouth's Central Offices that do not have fiber connectivity for purposes of interoffice transport.

RESPONSE: All of BellSouth's Central Offices in the nine-state region have fiber connectivity for interoffice transport, except:

Pleasureville – 1250 Main Street, Pleasureville, Kentucky

Lafayette – S. Main Street, Lafayette, Kentucky

Trenton – 290 5th Street, Trenton, Kentucky.

REQUEST: Provide for the most recent calendar year for which such information is available, the total monthly recurring revenues received from collocation-based services (i.e., space charges, power charges, cabling, terminations/cross-connects, etc.) in that calendar year and the number of collocation arrangements in-service at the end of that year.

RESPONSE: The total monthly recurring billing for collocation-based services in BellSouth's nine-state region for calendar year 2002 was $ million. This is highly sensitive, proprietary information and is being provided pursuant to the terms of the parties' protective agreement.

The number of collocation arrangements in-service in BellSouth's nine-state region as of December 31, 2002 was 3,987.

REQUEST: Provide for each calendar year from 1999 through 2002 separately for each type of collocation (i.e. caged physical, cageless physical, virtual, other) the total square footage and number of collocations in BellSouth's nine-state region and the total annual revenue collected for each type of collocation.

RESPONSE: BellSouth does not have total square footage separated by the type of collocation (i.e., caged physical, cageless physical, virtual and other) for each central office, end office and wire center in its nine-state region. However, BellSouth is currently compiling the approximate total square footage for each central office, end office and wire center in which there are collocators in the nine-state region. In addition to the above, BellSouth is also in the process of determining the number of collocation arrangements for each type of collocation in each central office, end office and wire center in the nine-state region. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

BellSouth does not separate collocation revenues between physical caged and physical cageless arrangements in its nine-state region, only between physical (which includes both caged and cageless) and virtual collocation. Listed below is the total physical and virtual collocation revenue for BellSouth's nine-state region for the period from 1999 through 2002.

Year	Physical Revenues	Virtual Revenues
1999		
2000		
2001		
2002		

This revenue information is proprietary and is provided pursuant to the terms of the parties' protective agreement.

REQUEST: Describe all components of BellSouth's own physical network that are utilized to connect a loop to a BellSouth Class 5 or similar local switch that is located in the same central office as the end user being served. Please describe with specificity all restrictions on the type of equipment that can be placed in collocation space.

RESPONSE: Many of BellSouth's loops are provided solely via metallic cables, i.e., no DLC is employed. In these cases, the first (or last, depending on your point of view) component of the loop is a passive assembly on the Main Distributing Frame ("MDF"). This assembly provides both a mounting for electrical protector units and terminals. These terminals allow individual paired wires, commonly denoted 'jumper wire,' to be connected between the loop and other equipment. For the purposes of this response, this terminal is denoted the Outside Plant ("OSP") termination. Similarly, the analog line ports in the end office switch are connected — at the time the switching equipment is installed — to a passive terminal block on the MDF to which 'jumper wire' can be connected. For the purposes of this response, this terminal is denoted the Office Equipment ("OE") termination. *To answer the first question for the cases in which loops are provided solely via metallic cables, the loop is connected to a local switch via 'jumper wires' between the OSP termination and the OE termination.*

In some cases, BellSouth's loops are provided via Universal Digital Loop Carrier ("UDLC"). In these cases, a Central Office Terminal ("COT") provides for analog to digital (and vice-versa) conversion. The COT is connected — at the time the COT is installed — to a passive terminal block on the MDF to which 'jumper wire' can be connected. For the purposes of this response, this terminal is denoted the COT termination. *To answer the first question for the cases in which loops are provided via UDLC, the loop is connected to a local switch via 'jumper wires' between the COT termination and the OE termination*.

Finally, some of BellSouth's loops are provided via Integrated Digital Loop Carrier ("IDLC"). In these cases, individual loops have no physical appearance. Instead, the loops are dynamic time-slot assignments in a DS1 (or higher-order) digital facility. These digital facilities are integrated directly into the local digital switch. *To answer the first question for the cases in which loops are provided via IDLC, there is no physical appearance for an individual loop. Depending on the specific type of IDLC employed, the digital bit stream may transit a multiplexer and/or a COT (which may be there to accommodate other UDLC systems).*

RESPONSE (cont'd):

BellSouth does not have a specified list of equipment that is restricted from collocation. BellSouth has denied requests to place equipment when a review of the collocation application indicates the requested equipment is not being utilized for interconnection or for access to unbundled network elements. For example, BellSouth denied a request to place equipment in collocation space when such equipment was intended solely for wireless services. BellSouth has also denied a request to place equipment when such equipment was intended solely for enhanced services.

REQUEST: Identify the number of central offices in BellSouth in which more than one CLEC was collocated in BellSouth's nine-state region:

a) As of December 31, 1996;
b) As of December 31, 2000; and
c) As of March 31, 2003.

RESPONSE: BellSouth is currently in the process of gathering the number of BellSouth central offices in which more than one CLEC was collocated in BellSouth's nine-state region. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: In BellSouth's nine-state region, in BellSouth's Central Offices that currently have one or more collocators, please provide the following information for each of those central offices:

a) Name and location of the central office;
b) The exchange served by the central office;
c) The number of collocations by collocation type;
d) The total amount of space currently being used by collocators;
e) The total amount of space available for use by collocators (which does not include space reserved for your company or its affiliates);
f) Names of carriers currently occupying collocation space;
g) The date the carriers took occupancy;
h) Collocation space held by carriers who are currently in bankruptcy proceedings;
i) Collocation space occupied by CLECs no longer operating;
j) Whether the CO is manned or unmanned;
k) The number of cross-connects in service to the wire center; and
l) The number of UNE loops provisioned to each collocating carrier in the past 3 months.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 88 on the grounds that certain sub-parts seek information that BellSouth cannot disclosure under the FCC's Customer Proprietary Network Information rules, BellSouth is currently in the process of compiling responsive information for subparts (a), (b), (g), (h), (i), (j), (k), and (l). Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: In BellSouth's nine-state region, identify the number of BellSouth's Central Offices in which there are no current collocation arrangements provided to CLECs. Of the number identified, please identify name and location of the central office, and state whether the CO is manned or unmanned.

RESPONSE: BellSouth is currently in the process of compiling the number of BellSouth Central Offices in BellSouth's nine-state region in which there are no current collocation arrangements provided by BellSouth to CLECs. Since this information must be pulled from several different sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: In BellSouth's nine-state region, does BellSouth currently provide or intend to provide main distribution frame copper facility collocation that would provide CLECs with comparable access to BellSouth's analog loops?

a) If the answer to this question is "yes," please provide the terms, conditions, and rates under which the collocation arrangement is provided or intended to be provided.

b) If the answer to this question is "no," please provide a detailed explanation to support your response.

RESPONSE: BellSouth interprets this interrogatory as asking whether or not BellSouth will permit the provisioning of copper entrance facilities as a form of interconnection. The answer is no, unless BellSouth is ordered by a State Commission to provide a particular carrier with a copper entrance facility. This is pursuant to the FCC's Rules, 47 CFR §51.323(d)(3), which provides "[w]hen an Incumbent LEC provides physical collocation, virtual collocation, or both, the incumbent LEC shall: permit interconnection of copper or coaxial cable if such interconnection is first approved by the state commission." Therefore, BellSouth does not currently provide or intend to provide copper entrance facilities as a form of interconnection, except as ordered by a state commission or in the case of an adjacent collocation arrangement.

To the extent this Interrogatory is asking whether or not BellSouth will permit the collocation of a distribution frame for the purpose of connecting to BellSouth's copper loop facilities, the answer is yes. The rates, terms and conditions can be found at the following BellSouth website:

http://www.interconnection.bellsouth.com/become_a_clec/html/ics_agreement.html

REQUEST: What is the maximum number of collocators at each central office and each remote terminal?

RESPONSE: As long as there is at least one (1) bay/rack of collocation space available in any CO and/or RT, then BellSouth will continue to offer collocation space to requesting carriers. There is no maximum number of collocators that BellSouth would permit to collocate at a given CO or RT. Each CO and RT is unique and the amount of space available for collocation would have to be determined for a specific CO at the point in time that a carrier requests collocation space.

REQUEST: For out-of-region long distance services provided to mass-market customers, specify how BellSouth obtains interexchange switching and transport capacity and the percentage of long distance services for interLATA voice mass-market customers that is provided using such non-BellSouth facilities.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 92 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objected on the grounds that this Request does not seek information from BellSouth Telecommunications, Inc.

REQUEST: What rate does BellSouth propose to charge to other carriers for access to de-listed local switching functionality?

a) Explain the source of each difference between the proposed just and reasonable rate for de-listed local switching and the approved just and reasonable TELRIC rate.

b) Provide the new return-on-equity achieved by the proposed just and reasonable rate for de-listed local switching.

RESPONSE: BellSouth proposes to charge the just, reasonable and negotiated rate for de-listed local switching set forth in current interconnection agreements between BellSouth and numerous CLECs, and to explore options for reductions off that rate by, for example, entering into volume and term arrangements.

a) The source of the difference between just and reasonable market rates and TELRIC rates will be based on market conditions.

b) The return-on-equity achieved by the just and reasonable negotiated rates will be dependent upon the rate charged for de-listed local switching, which, as set forth above, may vary pursuant to negotiated arrangements.

REQUEST: Has BellSouth ever considered leasing switching capacity from a third party to provide retail services:

a) Within its certificated incumbent territory (i.e., in-region)?
b) Outside its certificated incumbent territory (i.e., out-of-region)?

RESPONSE: No.

REQUEST: If the BellSouth is proposing a new rate for de-listed local switching with a higher allocation of joint and common costs than its cost-based rates, please provide for comparison:

a) Provide the current average per-minute revenue BellSouth derives from the sale of retail interLATA long distance service.

b) Provide BellSouth's current average per-minute long distance network costs, net of access charges.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 95 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: What changes need to be made to the terms, conditions and rates (nonrecurring and monthly recurring) for BellSouth enhanced extended loop tariffs or product offerings to eliminate impairment?

RESPONSE: BellSouth has no Enhanced Extended loop (EEL) tariffs. Additionally, BellSouth is uncertain what AT&T means in asking what "changes need to be made the terms, conditions and rates… to eliminate impairment". However, the EEL provisions in the BellSouth/AT&T interconnection agreement will need to be amended to comply with the Triennial Order. Additionally, impairment determinations relative to the individual elements that comprise the EEL will be made by each state Commission in BellSouth's region as part of the nine-month proceeding.

REQUEST: How will CLECs be able to use BellSouth's loop plant to provide DSL/IP-based services?

RESPONSE: The ability for CLECs to continue to use BellSouth's loop plant to provide DSL/IP based services is unchanged by the Triennial Review Order ("TRO"). CLEC's will continue to be able to order and provision UNE loops and UNE sub-loops to continue to provision their DSL/IP based services in the same manner as they do today.

REQUEST: What additional interconnection arrangements (including interconnection agreements or similar binding documents) need to be established or augmented to ensure call completion between all local exchange carriers (CLECs, SBC, Verizon, independent LECs, etc.)?

RESPONSE: Interconnection Agreements addressing trunk network architecture will need to be established between all involved parties. For example, if BellSouth is the tandem service provider, BellSouth would expect the CLEC to have interconnection agreements with the other LECs and CLECs.

REQUEST: How many mass-market long distance customers has BellSouth obtained in BellSouth's nine-state region by quarter since its entry to the State's interLATA long distance market? What percentage of those customers are also BellSouth local customers? Does BellSouth offer the same bundled local/long distance package throughout its service territory?

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 99 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: What period of time does BellSouth use to define a winback (and therefore churn)? How many mass-market local winbacks has BellSouth achieved in BellSouth's nine-state region by quarter since 1999? What percentage of those customers receive a bundle of services that include interLATA long distance service?

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 100 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: What limits, if any, are there on the number of PIC changes that can be completed in a single work day in BellSouth central offices?

RESPONSE: Limitations vary depending on the volume of pre negotiated due dated orders, and the negotiation system used to issue orders, ROAR, negotiation systems or DELIVERY. Another limiting factor is type of service.

REQUEST: Please state the total number of PIC changes BellSouth has performed in BellSouth's nine-state region for each month from January 1999 to present.

RESPONSE: BellSouth is currently in the process of gathering this information. Since this information must be pulled from several sources and then cross-referenced for verification purposes, BellSouth needs additional time to respond to this interrogatory request and will supplement this response as soon as possible, but in any event, no later than December 2, 2003.

REQUEST: Does BellSouth have pre-ordering and ordering processes that allow a CLEC to use one wholesale provider for switching and another for the loop, or otherwise uses multiple vendors in its service arrangement?

RESPONSE: Yes, to the extent BellSouth is the wholesale provider for switching or the loop. See Responses to Interrogatories Number 36 and 37.

REQUEST: Please provide BellSouth's variable costs and marginal costs for local, long distance and broadband services individually and as part of a bundled offering.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 104 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: On an individual central office, end office, and serving wire center basis, please provide a) forecasts of demand for circuit switching and b) current capacity utilization for the major switch components, (i.e., processors, line cards, trunk cards).

RESPONSE: Two files are attached. The first file (Attachment 105a) contains the Total Network Access Line ("TNAL") forecast for each of the switches in BellSouth's nine-state network. This is beginning-of-year data with the column labeled 2003 being the 1/1/2003 actual and the subsequent columns containing the forecast to years 2004-2007. The second file (Attachment 105b) contains utilization data for analog lines, TR-008 integrated digital loop carrier systems, GR-303 integrated digital loop carrier systems, BRI lines, PRIs and T1 trunk terminations. This is September 2003 data. Note that both the capacities and working quantities are provided in the spreadsheet along with the calculated utilization. These are the major switch components for which BellSouth maintains utilization data. BellSouth does not maintain utilization data for the switch processors.

Both of these files contain BellSouth proprietary data and are being provided pursuant to the terms of the parties' protective agreement.

REQUEST: On an individual central office, end office, and serving wire center basis, please provide the recent history of line growth/line loss for a) primary voice lines; b) additional voice lines; c) broadband/data lines.

RESPONSE: a), b) See Attachment 106, which contains the line growth/loss from December 2002 through August 2003 for each BellSouth switch in its nine-state region. This data reflects total network access lines. BellSouth does not have a breakdown of primary versus additional voice line growth/loss. This file contains BellSouth proprietary data and is being provided pursuant to the terms of the parties' protective agreement.

c) On October 13, 2003, BellSouth filed an objection to Interrogatory No. 106(c) on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Provide expected wholesale demand for a) UNE loops; b) UNE-P; and c) resale.

RESPONSE: BellSouth estimates the number of "in-service" units for: a) UNE loop, b) UNE-P and c) resale arrangements in its region at the end of 2004 will be as follows:

a) UNE loops
b)UNE-P
c) Resale

This information is proprietary and is being provided pursuant to the terms of the parties' protective agreement.

REQUEST: Identify and describe any constraints (if any) on BellSouth's ability to a) reduce prices in relation to some measure of cost (e.g., price floor based on TELRIC); b) target price reductions to geographic areas; and c) target price reductions to types of customers (including individual customers).

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 108 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Please provide BellSouth's current and planned bundling of local voice service, long distance voice service and/or data/broadband Internet access.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 109 on the grounds that it is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: On a wire center basis, please provide average local revenue per small business line and average local revenue per residential line. Please provide average "take rate" for vertical features.

RESPONSE: BellSouth has requested that AT&T clarify the difference in the information requested in Item No. 22 and Item No. 110. BellSouth is unable to respond until it receives this clarification.

REQUEST: Please provide disaggregated revenue data (residential, small business, large business, etc.) specific to the geographies that BellSouth claims are markets for impairment analysis purposes.

RESPONSE: BellSouth's investigation concerning geographic markets is ongoing; therefore, BellSouth cannot respond to this Interrogatory.

REQUEST: Please provide, by central office, by month, for the past 12 months, the following information for BellSouth's nine-state region:

a) % of originating calls which are intra switch;
b) % of originating calls which are inter-switch – local;
c) % of originating calls intra-LATA long distance;
d) % of originating calls inter-LATA intrastate; and
e) % of originating calls inter-LATA interstate

RESPONSE: On October 13, 2003, BellSouth filed an objection to Interrogatory No. 112 on the grounds that it is overly broad, unduly burdensome, and oppressive.