

BellSouth Telecommunications, Inc.  
Kentucky Public Service Commission  
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REQUEST: Please produce all documents describing, outlining, or memorializing the process described in BellSouth's response to Interrogatory No. 2. Documents should include BellSouth's internal documents and all documents available to CLECs.

RESPONSE: Please see attached documents:

- a) UNE-P to UNE-L Bulk Migration
- b) Customer Care Project Management – UNE-P to UNE-L Bulk Migration Process
- c) UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration - CLEC Information Package

The information in b) is proprietary and is being provided pursuant to the terms of the parties' protective agreement. The information is an internal document describing the methods and procedures used by BellSouth's Customer Care Project Management groups.

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**REQUEST:** Please produce all internal and external documentation, work papers, test related documents, test results, and analysis in BellSouth's response to Interrogatory No. 3.

**RESPONSE:** As stated in Interrogatory Item No 2, the bulk hot cut process has not been tested, at this time. Therefore, BellSouth has no responsive documents.

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**REQUEST:** With regard to BellSouth's response to Interrogatory No. 6, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.

**RESPONSE:** Because BellSouth has no limits, BellSouth has no documents responsive to this request.

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**REQUEST:** With regard to BellSouth's response to Interrogatory No. 7, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.

**RESPONSE:** Because BellSouth has no limits, BellSouth has no documents responsive to this request.

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REQUEST: Please produce the supporting work papers used in calculating or estimating the percentage described in BellSouth's response to Interrogatory No. 26.

RESPONSE: Responsive information is being provided.

There are no supporting work papers for the production of the percentages shown in the responsive document. However, from September 2002 until April 2003, the determination of a dispatch was based on the Routing Code used on the service order in the SOCS system. Starting in May 2003, the Optional Calling Plan-Business (OCB) field identifier (FID) was 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 file identified above are based on the presence of both a dispatch and IDLC indication for each conversion.

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REQUEST: Please provide a copy of all documents describing the BellSouth processes identified in BellSouth's response to Interrogatory No. 36.

RESPONSE: See Response to Interrogatory No. 36. In the event BellSouth is the wholesale provider for switching or the loop, BellSouth's Local Ordering Handbook describes the process for ordering these elements. The Local Ordering Handbook can be found on BellSouth's Interconnection Web Site at <http://interconnection.bellsouth.com/guides/html/leo.html>.

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**REQUEST:** Provide all methods and procedures documents, job aids and other materials provided to BellSouth personnel to use to process service requests for and to provision:

- (a) Individual hot cuts of loop and number portability.
- (b) Bulk migrations from UNE-P to UNE-L.

Such documents should include materials provided to BellSouth personnel in the CWINS Center, Central Office, field installation personnel and the LCSC.

**RESPONSE:** Responsive documents are attached. The documents are proprietary and are being provided pursuant to the terms of the parties' protective agreement.

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**REQUEST:** Provide a copy of BellSouth's Network Centers Force Sizing Model Process and Force Models, and all associated instructions.

**RESPONSE:** Responsive documents are being provided. The documents are proprietary and are being provided pursuant to the terms of the parties' protective agreement.



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**REQUEST:** Provide a copy of all methods and procedures and other documents used to plan and manage the work schedules of CO and field technicians.

**RESPONSE:** BellSouth has no responsive documents. BellSouth work schedules of CO and field technicians are based on the forecasted work load. BellSouth does not have specific methods and procedures used by supervisors to schedule CO personnel and field technicians. BellSouth has accumulated on-the-job experience relative to high activity periods. BellSouth supervisors base their scheduling on this experience.

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**REQUEST:** Provide copies of all documents which describe the process by which BellSouth processes multiple vendor orders, e.g. a CLEC using one wholesale provider for switching and another for the loop. Documents should include BellSouth's internal documents and all documents available to CLECs.

**RESPONSE:** BellSouth has no responsive documents.

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**REQUEST:** With regard to the documents referenced in Interrogatory No. 43, please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs, studies, or records.

**RESPONSE:** As stated in the response to Interrogatory Item No. 43, the work time is based on a SME (Subject Matter Expert) estimate and thus, no logs or studies are available supporting this value.

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REQUEST: Provide copies of all analysis and work papers used to support the information contained on page 7 of BellSouth's Ex Parte in FCC Docket 01-338 filed December 24, 2002 (Page is entitled "Conversion of the Embedded UNE-P Base – Top 20 UNE-P Wire Centers").

RESPONSE: Responsive documents are attached.

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**REQUEST:** In the Affidavit of Kenneth L. Ainsworth and W. Keith Milner filed by BellSouth in FCC 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". Please provide all work papers, analysis, studies, reports, etc. that BellSouth relied upon as the basis for this statement.

**RESPONSE:** BellSouth does not have any work papers, analysis, studies, reports, etc. which it relied upon as the basis for this statement. This statement was made based on the experience and knowledge of the BellSouth affiants which, when combined, spans over 68 years. Both affiants are experienced professionals whose careers include responsibilities for central office and MDF work. BellSouth has a proven record of working large projects such as central office conversions with multiple technicians working on the MDFs to successfully accomplish projects such as these.

**REQUEST:** With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

**RESPONSE:** Additional time to provide loops where existing service is provided over IDLC is necessary due to the fact that the process for handling a hot cut conversion with IDLC is significantly different than with non-IDLC. As an example, moving a jumper and then testing the circuit can accomplish a very simple non-IDLC hot cut. However, when a hot cut involves IDLC, the facility to the customer's premise is integrated with BellSouth's digital switch. The facility must be separated from BellSouth's switch prior to the hot cut because the switching port is provided by the CLEC. This may require a transfer to a non-IDLC facility and may also require a technician at the customer's premise and in the BellSouth central office. Occasionally, hot cuts involving IDLC may also require the placement of non-IDLC facilities prior to the day of the hot cut.

The number of hot cuts involving IDLC is an appreciable percentage of the total number of hot cuts, and when an IDLC hot cut does occur, additional flexibility is required to dispatch the technicians at both ends of the circuit. In terms of volume, in July 2003, there were 526 hot cuts in Florida, and, of these, 146 (or 27.7%) involved IDLC. In August 2003, there were 520 hot cuts and, of these, 163 (or 31.3%) involved IDLC.

If the interval for hot cuts involving IDLC is less than four hours, then in order to satisfy this measurement, BellSouth will have to dispatch a technician prior to the time the hot cut is scheduled to make a line and station transfer (LST) to place the customer service on a non-integrated facility. This approach requires additional work time for the technician, which is currently performed before the scheduled hot cut. Although this extra work means additional cost to BellSouth, which is not covered in the price for the service, unless a technician is dispatched to perform the LST the day before the scheduled hot cut, BellSouth would be unable to meet a 15-minute interval for cutting over loops.

Given this, BellSouth has a separate benchmark interval for Measure P-7A, Coordinated Customers Conversions – Hot Cut Timeliness % within Interval and Average Interval for hot cuts involving Integrated Digital Loop Carrier (“IDLC”)

RESPONSE (CONT.):

in order to account for the greater time required to coordinate these hot cuts. BellSouth has a benchmark of 95% within a 4-hour window. This allows BellSouth to dispatch the technician only once on the date the hot cut is scheduled to perform the station transfer to a non-IDLC facility, and to call the CWINS center when the technician is ready to perform the hot cut. The four-hour window would be 8 a.m. to 12 p.m. or 1 p.m. to 5 p.m. This four-hour window is consistent with the AM or PM dispatch strategy BellSouth currently has in place for other Provisioning work, providing the technicians sufficient time to complete all of the associated work with one dispatch in most cases.

On hot cuts involving IDLC, BellSouth would notify the CLEC by 10:30 a.m. the day before the scheduled cutover to advise the CLEC that IDLC is involved and that the four-hour window would apply.

The benchmark BellSouth proposes is consistent with the approach in New York, where Verizon has a four-hour window to cut over a loop served on IDLC. (See New York State Carrier-to-Carrier Guidelines Performance Standards and Reports, November 2002, PR-9 Hot Cut Performance, attached.)

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**REQUEST:** Provide all documents that refer, relate to, or discuss the loop cutover volume capacity or through-put capability of the current BellSouth's entire nine-state region and all documents that refer, relate to, analyze, or discuss how BellSouth believes such capacity/capability may be increased.

**RESPONSE:** See response to Production of Documents Item No 8.



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REQUEST: Referring to Interrogatory No. 50, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and the product, customer and geographic market served by such wholesale provider.

RESPONSE: BellSouth has no responsive documents.

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REQUEST: Referring to Interrogatory No. 50, produce all documents substantiating any assertion that a non-ILEC wholesale circuit switching provider is operationally ready to provide wholesale switching and that such provider and BellSouth have procedures in place to enable a carrier purchasing a BellSouth analog loop to provide service of equivalent quality using another non-ILEC carrier's switch.

RESPONSE: BellSouth has no responsive documents.

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**REQUEST:** Referring to Interrogatory No. 50, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.

**RESPONSE:** BellSouth has no responsive documents.

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REQUEST: Referring to Interrogatory No. 52, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self-provider and the product, customer and geographic market served by such self-provider.

RESPONSE: BellSouth has no responsive documents.

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REQUEST: Referring to Interrogatory No. 52, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.

RESPONSE: BellSouth has no responsive documents.

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REQUEST: Referring to Interrogatory No. 71, if the answer to (c) is in the affirmative, produce all documents that refer, relate to, or discuss BellSouth's consideration of off-loading such lines to a different local switch.

RESPONSE: Not applicable.

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REQUEST: Referring to Interrogatory No. 72, if the answer to (a) is in the affirmative, please produce a copy of BellSouth's switch engineering guidelines.

RESPONSE: Not applicable.

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REQUEST: Referring to Interrogatory No. 73, please produce all documents describing BellSouth's FAR guidelines.

RESPONSE: Not applicable.



REQUEST: Provide all internal documents that refer, relate to, or discuss the profitability of BellSouth engaging in UNE-based competition to serve residential and/or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area.

- a) Identify each operational and economic factor BellSouth believes is appropriate to consider in making a determination whether to implement, continue, expand or curtail any out-of-region local market entry strategy.
- b) Provide all documents that refer or relate to any operational or economic issue BellSouth has encountered in any effort BellSouth has made to implement or expand its out-of-region local market entry strategy.

RESPONSE: On October 13, 2003, BellSouth filed an objection to Request for Production No. 24 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.

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**REQUEST:** Provide all documents that analyze out-of-region local market entry that have been reviewed, considered, or evaluated by BellSouth regarding entry to serve "mass-market" retail customers using self-provided switching since passage of the 1996 Telecom Act.

**RESPONSE:** On October 13, 2003, BellSouth filed an objection to Request for Production No. 25 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.

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**REQUEST:** Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth whether to lease switching capacity from others as part of its out-of-region local market entry strategy to serve "mass-market" customers.

**RESPONSE:** On October 13, 2003, BellSouth filed an objection to Request for Production No. 26 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.

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**REQUEST:** Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth of offering wholesale switching in any out-of-region local market.

**RESPONSE:** On October 13, 2003, BellSouth filed an objection to Request for Production No. 27 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.

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**REQUEST:** Provide all documents analyzing or describing any external "market" for leased local switching capacity that BellSouth reviewed in evaluating its proposed pricing for de-listed local switching to serve voice grade loops. If no documents were reviewed, explain how BellSouth established its prices for de-listed local switching was established.

**RESPONSE:** BellSouth has been unable to locate any documents that may have existed or been used by the individuals who developed the \$14 market rate. BellSouth has been unable to locate anyone with knowledge or information of the process used to arrive at that rate. The individuals that were involved in the process are no longer employees of the company.

REQUEST: Provide any and all market surveys conducted or other documents and information reviewed by BellSouth that discuss or address:

- (a) Pricing strategies of competitors offering local switching.
- (b) Product descriptions of competitors' offerings of local switching for mass-market customers.
- (c) Demand elasticity for local switching.
- (d) Demand projections related to the market for local switching.
- (e) Marketing strategies used by competitors offering local switching to serve mass-market customers.

RESPONSE: It is unclear to BellSouth what AT&T means by the term "local switching" in this document request; specifically, whether AT&T is requesting information that relates solely to switches that provide local service, or whether AT&T is seeking documents concerning local switching as a service (e.g., wholesale switching), or documents that have some other geographic limitation. BellSouth estimates that documents responsive to this request may be voluminous. BellSouth will produce responsive documents at a mutually convenient time and location after AT&T provides clarification concerning the type(s) of documents it is requesting. BellSouth will not produce documents that are protected by any applicable privileges or documents that it has obtained pursuant to license agreements that preclude disclosure to third parties.

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REQUEST: Referring to Interrogatory No. 103, please provide a copy of all documents describing BellSouth processes identified.

RESPONSE: See Response to Request for Production No. 6.

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**REQUEST:** Referring to Interrogatory No. 108, please produce all documents referring or relating to any strategic behavior (pricing offers, advertising campaigns, packaged offerings, waiver of fees, term contract offerings, marketing strategies) BellSouth has evaluated or implemented in consideration of one or more CLEC's planned or actual entry into a local service market.

**RESPONSE:** On October 13, 2003, BellSouth filed an objection to Request for Production No. 31 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.