

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.

SUPPLEMENTAL RESPONSE:

The information responsive to this request is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_01.pdf

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NOTE: A central office is noted as "Manned" if BellSouth employees report to that central office every day regardless of workload, and a central office is marked "Unmanned" if employees are only dispatched to that location when workload warrants. No central offices are unmanned all the time. Some central offices contain multiple switches that can be either hosts or remotes.

- 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.

SUPPLEMENTAL RESPONSE:

BellSouth does not retain the data necessary to provide the information in the format requested. Specifically, BellSouth's databases do not always reflect the former status of a particular facility. For example, a facility currently classified as a UNE-L line does not carry information reflecting whether that facility was formerly a Retail, Resale, UNE-P, UNE-L to another carrier, or a new installation as a UNE-L. However, BellSouth has gathered data from several different sources in an attempt to be responsive, although the total numbers will not add back to 100% of data. Furthermore, the data reflect hot cuts from November 2000, which is the earliest month for which data is available, through September 2003, which is the most current month for which data is available.

- (a) Data reflecting the day, central office CLLI, and number of access lines transferred are contained in a Microsoft Excel file, which is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_04.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.

- (b) (i) 306,930 region wide
(ii) 216,613 region wide
(iii) 48,313 region wide
(iv) 8,634 region wide
- (c) Presently, BellSouth does not separately identify in its databases cuts made as part of a batch cut, although a method of identifying batch cuts or bulk migrations of UNE-P to UNE-L is currently being developed. To date, Florida is the only state where BellSouth has received a Bulk Migration request.

SUPPLEMENTAL RESPONSE (CONT.):

- (i) In the NDADFLGG Central Office, BellSouth has worked one Bulk Migration involving one line. This request initially had 2 lines submitted on the request but one line was later canceled. This request was converted on 6/18/2003. In the MIAMFLRR Central Office, BellSouth has worked one Bulk Migration with 2 lines. The request also was converted on 6/18/2003.
- (ii) BellSouth does not have a Bulk Migration process for the transfer of Retail lines to UNE-L.
- (iii) See response to (i) above. All of these lines were converted from UNE-P.
- (iv) BellSouth does not have a Bulk Migration process for the transfer of Resale lines to UNE-L.

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.

SUPPLEMENTAL RESPONSE:

BellSouth does not have a policy or practice 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.

SUPPLEMENTAL RESPONSE:

BellSouth does not have a policy or practice to limit the number of COs in which bulk hot cuts 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.

SUPPLEMENTAL RESPONSE:

There is no set number of hot cuts that BellSouth has established for either "bulk" or individual hot cuts for any central office in any state in the BellSouth region. BellSouth's hot cut process is based on load volumes and force. BellSouth uses plan size methods to monitor staffing levels to ensure that expected hot cut volumes will be met.

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.

SUPPLEMENTAL RESPONSE:

The earliest month for which hot cut data is available is November 2000. Those central offices in which BellSouth has not performed a hot cut from November 2000 through September 2003, which is the most current data month, is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_10.zip

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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.

SUPPLEMENTAL 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:

<u>Activity</u>	<u>1st Loop (Minutes)</u>	<u>Additional Loops (Minutes)</u>
non-coordinated cutover	26	17
coordinated cutover	36	19
coordinated time-specific cutover	36	19
bulk (with coordination) cutover	36	19

All of the times are based on Subject Matter Expert estimates. See also BellSouth's response to AT&T's First Set of Interrogatories, Item No. 43.

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.

SUPPLEMENTAL RESPONSE:

See BellSouth's supplemental response to AT&T's First Set of Interrogatories, Item No. 4.

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?

SUPPLEMENTAL RESPONSE:

See BellSouth's supplemental response to AT&T's First Set of Interrogatories, Item No. 8.

BellSouth Telecommunications, Inc.
Kentucky Public Service Commission
Case 2003-00379

AT&T's 1st Interrogatories

October 10, 2003

SUPPLEMENTAL RESPONSE Item No. 16

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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?

SUPPLEMENTAL RESPONSE:

See BellSouth's supplemental response to AT&T's First Set of Interrogatories, Item No. 8.

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.

SUPPLEMENTAL RESPONSE:

The information responsive to this request is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_17.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.

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 percent of loops in Florida 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.

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.

SUPPLEMENTAL RESPONSE:

- (a) Information concerning the approximate square footage of collocation floor space for each individual CO, end office and serving wire center in BellSouth's nine-state region in which there are currently collocators is available via the following URL link: <http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_40.zip. This information is provided to the Kentucky Public Service Commission on CD-ROM. BellSouth designates individual CO, end office and serving wire center floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space" until the carrier physically removes its equipment and the collocation arrangement is reduced or terminated.
- (b) The aggregate amount of collocation space currently occupied by carriers in BellSouth's COs, end offices and serving wire centers in BellSouth's nine-state region is provided in the response to Item No. 40(a) above.
- (c) BellSouth objects to this request on the grounds that it seeks information that is not relevant and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007.

SUPPLEMENTAL RESPONSE (CONT.):

- (d) Information concerning the approximate square footage of collocation space held or occupied by carriers who are no longer in operation (i.e., carriers that are out of business or have filed for bankruptcy) in BellSouth's nine-state region is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_40.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.

- (e) Information concerning those COs, end offices and wire centers in BellSouth's nine-state region in which collocation space currently exists is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_40.zip. This information is provided to the Kentucky Public Service Commission on CD-ROM. Collocation space is available in all of BellSouth's COs, end offices and wire centers in BellSouth's nine-state region, with the exception of the following three offices: J. Turner Butler CO in Jacksonville, Florida (CLLI Code: JCVLFLJT), Lake Mary Main CO in Lake Mary, Florida (CLLI Code: LKMRFLMA), and the Old Dowd CO in Charlotte, North Carolina. These three offices are contained on BellSouth's Space Exhaust List, which is posted on BellSouth's website at:

http://interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91081451-C.pdf. The file name is 91081451-C.pdf. This

information is provided to the Kentucky Public Service Commission on CD-ROM.

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.

SUPPLEMENTAL RESPONSE:

The records documenting the time it takes BellSouth employees to perform hot cuts is captured in the performance measures and underlying data discussed in BellSouth's response to AT&T's First Set of Interrogatories, Item No. 39, which is readily available to AT&T. This data captures all hot cuts whether ordered via the individual process or the batch process. BellSouth also has completed a cost study for the batch hot cut process as defined in the UNE-P to UNE-L Bulk Migration document found in the CLEC Information Package, which includes work times associated with the tasks in performing the batch hot cut process. Cost Study information is available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-04/>

The file name is GA_INTER_ATTACH_43.ZIP

This information is provided to the Kentucky Public Service Commission on CD-ROM.

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?

SUPPLEMENTAL 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) There is no set number of conversions that BellSouth has established. BellSouth uses plan size methods to monitor staffing levels to ensure that expected conversion volumes can be met.

SUPPLEMENTAL RESPONSE CONT.):

- (d) The information responsive to this request is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_44d.pdf

This information is provided to the Kentucky Public Service Commission on CD-ROM.

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

SUPPLEMENTAL RESPONSE:

- a) See Attachment. The numbers in the columns labeled "# of Techs on Conv. Frame" and "# of Techs on Module Frame" represent the maximum number of technicians that can work on conventional and modular style Main Distributing Frames ("MDFs") without impacting productivity. As a general rule, BellSouth allows two technicians per 50 verticals on a conventional frame (up to 200 verticals or a maximum of 10 technicians) and 1 technician per 10 modules on a modular frame.

SUPPLEMENTAL RESPONSE (CONT.):

- b) The frequency of the number of technicians who “may be at work simultaneously on the same MDF with no negative impact on productivity” is not information tracked by BellSouth. The number of technicians working on a frame depends on the workload.

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

SUPPLEMENTAL RESPONSE:

BellSouth has no current plans to change its OSS charges that are either established by the state Public Service Commissions or negotiated by the parties in connection with its batch hot cut process.

- 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.

SUPPLEMENTAL RESPONSE:

- (a) The information responsive to this request is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_55.pdf

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The information responsive to this request is located under the Column labeled "Total Analog UNE-P Lines."
- (b) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "Total Analog UNE-L Loops." For purposes of this response, "Total Analog UNE-L Loops" includes SL1, SL2, and UCL-ND loop types.
- (c) See response to subpart (a) above. The information responsive to this request is located under the Column labeled "No. of Collocated CLECs."
- (d) To the extent this information is available, it has been provided in BellSouth's response to Interrogatory Item No. 21.

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

- a) Central Offices; and
- b) Remote Terminals.

SUPPLEMENTAL RESPONSE:

- a) 1,590
- b) 35,592

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.

SUPPLEMENTAL RESPONSE:

BellSouth does not have total square footage separated by 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. See BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item 40 for information concerning the approximate square footage of collocation floor space for each individual CO, end office and serving wire center in BellSouth's nine-state region in which there are currently collocators. BellSouth designates individual CO, end office and serving wire center floor space as "collocation space" when it is assigned to a collocator that has submitted a valid collocation application. The floor space remains designated as "collocation space" until the carrier physically removes its equipment and the collocation arrangement is reduced or terminated.

SUPPLEMENTAL RESPONSE (CONT.):

<u>Year</u>	<u>Type of Collo Arrangement</u>	<u>Total No. of Collocations</u>
1999	Caged	637
	Cageless	575
	Virtual	338
	Other (Unidentified)	19
2000	Caged	1,626
	Cageless	2,734
	Virtual	384
	Other (Unidentified)	29
2001	Caged	1,551
	Cageless	2,658
	Virtual	392
	Other (Unidentified)	28
2002	Caged	1,291
	Cageless	2,542
	Virtual	391
	Other (Unidentified)	26

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.

<u>Year</u>	<u>Physical Revenues</u>	<u>Virtual Revenues</u>
1999	-----	-----
2000	-----	-----
2001	-----	-----
2002	-----	-----

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

REQUEST: Identify the number of BellSouth central offices 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.

SUPPLEMENTAL RESPONSE:

- a) 3
- b) 476
- c) 477

- 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.

SUPPLEMENTAL RESPONSE:

- (a) The name and location of each BellSouth Central Office in BellSouth's nine-state region that currently has one or more collocators are available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_88.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.

SUPPLEMENTAL RESPONSE (CONT.):

- (b) The name of the exchange served by each BellSouth Central Office in which there are one or more collocators in BellSouth's nine-state region is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_88.zip

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- (c) The number of collocation arrangements by collocation type (physical and virtual) for each BellSouth Central Office in BellSouth's nine-state region is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_88.zip

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- (d) See BellSouth's Supplemental Response to Interrogatory Item No. 40(b).

- (e) See BellSouth's Supplemental Response to Interrogatory Item No. 40(e).

- (f) BellSouth objects to this request on the grounds that it seeks information not relevant to this proceeding and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information rules, 47 CFR §64.2007.

SUPPLEMENTAL RESPONSE (CONT.):

- (g) BellSouth objects to this request on the grounds that it seeks information not relevant to this proceeding and that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information rules, 47 CFR §64.2007.
- (h) See BellSouth's Supplemental Response to Interrogatory Item No. 40(d).
- (i) See BellSouth's Supplemental Response to Interrogatory Item No. 40(d).
- (j) See BellSouth's Supplemental Response to Interrogatory Item No. 1
- (k) The number of cross-connects that are in-service in each BellSouth Central Office in BellSouth's nine-state region is available via the following URL link.
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_88.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.
- (l) Information concerning the number of UNE loops provisioned to collocating carriers without disclosing CPNI information is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_88.zip

This information is provided to the Kentucky Public Service Commission on CD-ROM.

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.

SUPPLEMENTAL RESPONSE:

In BellSouth's nine-state region, there are 1,042 Central Offices in which BellSouth is providing no collocation arrangements to CLECs. Information concerning the Name and Location of the BellSouth Central Offices in BellSouth's nine-state region in which there are no current collocation arrangements provided by BellSouth to CLECs is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_89.pdf

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See BellSouth's Supplemental Response to AT&T's First Set of Interrogatories, Item No. 1, as to whether or not these COs are manned or unmanned.

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.

SUPPLEMENTAL RESPONSE:

The information responsive to this request is available via the following URL link:
<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/>

The file name is GA_INTER_ATTACH_102.zip

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