COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER)   CASE NO. 2003-00379
REGARDING UNBUNDLING REQUIREMENTS)
FOR INDIVIDUAL NETWORK ELEMENTS)

BELLSOUTH TELECOMMUNICATIONS, INC.'S GENERAL AND SPECIFIC OBJECTIONS TO MCI WORLDCOM COMMUNICATIONS, INC.'S SECOND SET OF DATA REQUESTS

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following

responses and objections to MCI WorldCom Communications, Inc. (hereinafter "MCI") Second

Set of Data Requests dated November 24, 2003, and states as follows:

The objections stated herein are preliminary in nature. Should additional grounds

for objection be discovered as BellSouth prepares its answers to the above-referenced

data requests, BellSouth reserves the right to supplement, revise, or modify its objections

at the time it serves its responses.

GENERAL OBJECTIONS

1.   BellSouth objects to MCI's discovery to the extent that it seeks to impose

an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other

persons that are not parties to this case on the grounds that such discovery is overly

broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

BellSouth will not be responding to discovery that seeks information from parent and affiliate companies.

2.   BellSouth objects to each and every interrogatory to the extent that such request may call for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3.   BellSouth objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories and requests for production. Any answers provided by BellSouth in response to the interrogatories and requests for production will be provided subject to, and without waiver of, the foregoing objection.

4.   BellSouth objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. 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 notes that in certain responses MCI filed to BellSouth's discovery this docket, MCI stated that "[w]ith respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis." (See, e.g., MCI response to BellSouth Interrogatory 16). Likewise, AT&T stated in response to discovery requests "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 BellSouth Interrogatory 15). BellSouth anticipates filing a motion or motions to compel seeking the information MCI and AT&T have objected to produce because, as CLECs, their 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 and MCI will no doubt seek to attack any inputs that BellSouth proposes.

5.   BellSouth objects to providing information to the extent that such information is already a matter of public record before this or another state commission or federal regulatory agency; or is otherwise available as a matter of public record, e.g., is available on a publicly accessible website. Particularly, in light of the voluminous nature of MCI's requests, MCI is not entitled to require other parties to gather information that is equally available and accessible to MCI.

6.   BellSouth objects to MCI's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Kentucky Public Service Commission's Rules, the Rules of Civil Procedure, or Kentucky Law. BellSouth will respond to MCI's discovery as follows:

a.   BellSouth will provide the name of the company witness(es) or employee(s) responsible for compiling the information.

b.   BellSouth will provide responsive documents in the manner specified by the Commission but will not engage in any specified organization,

labeling, electronic production, or other production that is not required by the applicable rules unless BellSouth chooses to do so in its discretion.

c. BellSouth acknowledges that MCI's instructions seek information "at the most granular level" that BellSouth possesses the information, but do not seek the creation of new data. BellSouth objects, however, to MCI's instruction to the extent that it requires BellSouth to interpret what the most granular level of data may be and to respond accordingly. MCI has propounded <u>hundreds</u> of requests with subparts, and it is unduly burdensome, overly broad, and oppressive for BellSouth to sort through the requests and determine the level of granularity sought.

d. BellSouth objects to MCI's request to fill in certain tables to the extent that BellSouth does not maintain information in the manner specified by MCI.

e. BellSouth objects to MCI's definition of whether a document is in its custody or control.

7. BellSouth objects to each and every interrogatory insofar as most of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written. For example, MCI's requests seek information for extended time periods (e.g., from July 2001) on a "daily, weekly and monthly" basis. Compiling the information requested by MCI would require over 730 lines of data (e.g., 365 days times 2 years). Moreover, many of the data requests seek the information on a "daily, weekly and monthly basis" for requests with subparts. Request No. 5 is just one example of such a request. BellSouth will respond to relevant discovery with information it maintains in the ordinary

course of its business and with reasonable time limitations. BellSouth does not intend to provide information on a CLLI code basis for "each month since July 2001" as MCI has requested in many interrogatories on the grounds that, even if BellSouth maintains such information, retrieving, compiling, and responding to the data is unduly burdensome, overly broad, and oppressive.

8.   BellSouth is a large corporation with employees located in many different locations in Kentucky and in other states. In the course of its business, BellSouth creates countless documents that are not subject to state commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

9.   BellSouth objects to each and every interrogatory and request for production to the extent that the information requested constitutes "trade secrets" or that would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential business information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general or specific objections contained herein.

10.   To the extent that any request is overly broad and unduly burdensome, BellSouth objects to any discovery request that seeks to obtain "all" of particular

documents, items, or information. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

11.   BellSouth objects to the manner in which certain discovery is requested. BellSouth may not maintain information in the ordinary course of its business in the particular format requested by MCI. BellSouth objects to providing responsive information in the format requested by the MCI on the grounds that doing so would be overly broad, unduly burdensome, and oppressive.

12.   BellSouth objects to MCI's discovery to the extent that it seeks to have BellSouth create documents not in existence at the time of the request.

13.   In light of the short time frames in this proceeding and due to MCI's voluminous discovery requests, BellSouth has attempted to provide specific objections to interrogatories that are objectionable. However, due to the compressed schedule in this and other proceedings, BellSouth reserves the right to lodge additional objections in its responses. As a final matter, BellSouth acknowledges the obligation of the parties to confer and discuss discovery concerns in good faith. BellSouth is willing to discuss with MCI its specific discovery concerns in an effort to resolve these objections. Absent reasonable limitations on the scope of the questions, the level of detail requested, the timeframes requested, and a resolution of relevancy, BellSouth will be unable to provide responses to the specific interrogatories listed below unless otherwise stated.

SPECIFIC OBJECTIONS TO PARTICULAR DATA REQUESTS

Given the particularly voluminous nature of MCI's requests, BellSouth has, to the extent possible, incorporated by reference its general objections relevant to the specific

data request at issue. BellSouth has used this format in an effort to limit the volume of its response rather than including, in each instance, a similar statement of the objectionable nature of these requests.

REQUEST NO. 68: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, customer change from one carrier to another) on each of the following bases:

    (1)   number of customers changing carriers, and percentage of then-current customers changing carriers, by customer type (*e.g.*, residential, business with one to three DS-0/voice grade les to a single customer premises; business with more than three DS-0/voice grade lines to a single customer premises);

    (2)   number of customers changing carriers, and percentage of then-current customers changing carriers, by service type (*i.e.*, local exchange voice service only; long distance voice service only; bundled local exchange and long distance voice services; bundled local exchange and DSL; and bundled local exchange, long distance, and DSL services);

    (3)   number of customers changing carriers, and percentage of then-current customers changing carriers, by customer type (*e.g.*, residential, business with one to three DS-0/voice grade lines to a single customer premises; business with more than three DS-0/voice grade lines to a single customer premises) by the following customer ages: 1) churn within the first three months after the customer's service is provisioned 2) churn within the first six months after the customer's service is provisioned.

OBJECTION: BellSouth incorporates by reference as if fully stated herein its General Objections: 4, 7 and 11.

REQUEST NO. 69: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for residential local exchange customers between each of the following service configurations: 1) BellSouth voice only; 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

OBJECTION: BellSouth incorporates by reference as if fully stated herein its General Objections: 4, 7 and 11.

REQUEST NO. 70: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for <u>business local exchange voice customers with one to three lines</u> between each of the following service configurations: 1) BellSouth voice only; 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

OBJECTION: BellSouth incorporates by reference as if fully stated herein its General Objections: 4, 7 and 11.

REQUEST NO. 71: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data for each month since July 1, 2001 for your retail customer "churn" (*i.e.*, the number of customers changing from one carrier to another) for <u>business local exchange voice customers with more than three lines</u> between each of the following service configurations: 1) BellSouth voice only; 2) BellSouth voice plus DSL; 3) BellSouth DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

OBJECTION: BellSouth incorporates by reference as if fully stated herein its General Objections: 4, 7 and 11.

REQUEST NO. 72: Please provide, on a CLLI-code-specific basis, the number of loops that BellSouth has migrated through hot cuts (i.e., individual coordinated simultaneous transfer of DS-0/voice grade loops with live customers' service transferred) since July 1, 2001 that involved manual frame (MDF and/or IDF) jumper work, reported on a daily, weekly and monthly basis, from each of the following: 1) BellSouth retail analog services; 2) CLEC UNE loops. Please provide all supporting documents or information regarding such provisioning volumes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 73: For each CLLI code in Kentucky, please provide the number of individual cross connects/jumper jobs performed on (1) the MDF, and (2) any IDF(s), during each month since July 1, 2001.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objection: 7 and 11.

REQUEST NO. 74: Please provide the actual (i.e., unadjusted and not subjected to performance measure metrics) minimum, maximum, and mean provisioning intervals for BellSouth provisioning of UNE loops for each month since July 1, 2001, reported on a CLLI code basis.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 6c, 7, and 11.

REQUEST NO.76 : With regard to your response to MCI-72, please provide on a CLLI code-specific basis, the number of trouble reports within the first five days after the hot cut.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 6c, 7, and 11.

REQUEST NO. 77: With regard to your response to MCI-72, please specify the percentage of hot cuts that were performed within the agreed-upon time frame (*e.g.*, as of the deadline set pursuant to an interconnection agreement or otherwise agreed to with the other carrier or pursuant to other state requirements). Please report this information on the same daily, weekly and monthly basis as in Request No. 5.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 6c, 7 and 11.

REQUEST NO. 78: With regard to your response to MCI-72, please state whether the existing customer loop was re-used for each of the migrations identified. If the loop was not re-used, please provide a detailed explanation of the reasons why it was not re-used, and any consequence of not being able to reuse the loop (i.e., delayed installation interval, loss of customer telephone number, need for rewiring at remote terminal/FDI/customer NID, etc.).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 79: With respect to the hot cuts identified in response to MCI-72, please provide a detailed description of each work effort your personnel had to perform, the costs you incurred, and the maximum number of hot cuts that you have accomplished per day per CLLI code since July 1, 2001.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 84: On a statewide basis and for each CLLI code, reported monthly for each month since July 1, 2001, please provide a detailed description of UNE loop orders cancelled prior to customer migration. Your response should include the number and percentage of such order cancellations compared to the total number of UNE loop orders; a detailed description of the number and percentage of trouble reports during the hot cut process; and a detailed description of the reason the customer cancelled the order prior to migration.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 85: On a statewide basis and for each CLLI code, reported monthly for each month since July 1, 2001, please provide the percentage of hot cuts that were successfully completed and tested consistent with the time intervals specified in BellSouth's Methods and Procedures or other guidelines or work rules.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 89: On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-87, please identify the minimum, maximum and average actual work time(s) for 1) the total work effort and 2) each step or task in the work effort identified in response to MCI-88, reported monthly for each month since July 1, 2001.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7

REQUEST NO. 90: On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-87, please identify the minimum, maximum and average work time(s) for 1) the total work effort and 2) each step or task in the work effort identified in response to MCI-88, specified in: a) BellSouth union contracts covering workers who routinely perform cross connect/jumper jobs in the BellSouth central offices; b) BellSouth methods and procedures, guidelines, rules, regulations, specifications or any other written directive; c) employee performance evaluation criteria.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 91: On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-87, and for cross connect/jumper jobs in general, please identify the minimum, maximum and average number of such jobs that must be performed by each individual employee or worker during the time interval specified in BellSouth employee performance

requirements and/or union contracts (i.e., the number of cross connect/jumper jobs that must be performed per hour, day, shift, or other time interval).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 92: Please state whether cross connect/jumper job performance has ever been the subject of litigation, arbitration, mediation, labor negotiations, formal labor disputes, informal labor disputes, or evaluation by any third party (e.g. federal or state agencies, etc.). If the answer is anything other than an unqualified no, please provide supporting details and documentation.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 93: Please describe how you prioritize cross connects/jumper jobs during normal working conditions (e.g., first come first served, by service type, etc.) and state whether those priorities change during strikes and other labor related work disruptions. If the priorities change, please provide a detailed description of the manner in which they change.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 94: Please provide all time and motion studies, special studies, or other evaluations of cross connect/jumper work times and processes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 95: Please provide the studies, analyses, and/or calculations of cross connect/jumper job work times and loaded labor costs from the most recent non-recurring cost study submitted by BellSouth to the Kentucky Public Service Commission.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5.

REQUEST NO. 96: For each central office in Kentucky, for each month since July 1, 2001, please state:

   (a)   whether the central office was staffed with one or more resident frame technician(s) (or other job classification(s) that routinely perform cross connect/jumper jobs);

(b) for each central office that was so staffed, the hours during which it was staffed;

(c) for each central office that was so staffed, the number of person hours per day or per week devoted to cross connect/jumper jobs;

(d) for each central office that was not staffed, the number of person hours per day or per week devoted to cross connect/jumper jobs.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 97: Please provide a list, detailed description, method of sampling, method of calculation, and monetary penalty for all UNE performance measures or metrics applicable in Kentucky. State which of these measurements or metrics you assert is relevant to the issues in this proceeding.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4, 5, 7 and 10.

REQUEST NO. 98: Please provide all UNE performance measure or metric reports applicable in Kentucky, including a report of any penalties paid, for each month since July 1, 2001. If no report provides penalties paid, state the amounts of penalties paid together with the reasons therefore, for each month since July 1, 2001.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4, 5, 7 and 10.

REQUEST NO. 99: Please provide all third party evaluations and/or reports addressing and/or assessing BellSouth performance under the UNE performance measures or metrics applicable in Kentucky.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 103: Please provide a detailed description of the current ILEC OSS capabilities to support automated, flow-through processes for Pre-ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure a copy of all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 104: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Ordering</u> for DS-0/<u>voice-grade</u> UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 121: To the extent that BellSouth's responses to MCI-103 to MCI-117 state that BellSouth does not have in place OSS capabilities to support automated, flow-through processes, please provide for each response to Data Request MCI-103 to MCI-117 a detailed estimate of the costs, work effort and timeframes associated with any OSS modification or upgrade necessary to convert BellSouth's manual and/or semi-mechanized process to an automated, flow-through process for each of the OSS functions and each of the service types in MCI-103 to MCI-117. Please identify for disclosure all documents describing these modifications or upgrades, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 122: To the extent that BellSouth's responses to MCI-103 to MCI-117 state that BellSouth does not have in place OSS capabilities to support automated, flow-through processes, please provide a detailed description of the <u>current</u> manual and/or semi-mechanized ILEC OSS processes for each of the OSS functions and each of the service types in MCI-103 to MCI-117. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 123: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Pre-ordering</u> for <u>DS-0/voice-grade</u> UNE loops on a) all-copper facilities; b) hybrid

fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 124: Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Ordering for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 126: Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Maintenance/Repair for DS-0/voice-grade UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 129: Please provide a detailed description of the planned ILEC OSS capabilities to support automated, flow-through processes for Ordering for DSL-capable UNE loops on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify for disclosure all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 134: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Ordering</u> for UNE loops capable of supporting <u>line splitting</u> (*i.e.* voice service and DSL service carried on a single wire pair entering the customer's premises) on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC; and c) hybrid fiber-copper facilities using UDLC or NGDLC. Please identify all documents describing these processes, including but not limited to documents sent to or received from Telcordia, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 10.

REQUEST NO. 141: Please state whether BellSouth provides CLECs with real-time, read-only access to all data in all BellSouth OSS (including what some ILECs have called back-office systems) related to loop and transport facilities.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth notes that this proceeding concerns switching, rather than loop and transport facilities.

REQUEST NO. 142: To the extent that the response to MCI-141 indicates that CLECs have real time, read-only access to the described data, please provide a detailed description of the manner in which CLECs may access and use all data in BellSouth OSS related to loop and transport facilities on a real-time, read-only basis.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth notes that this proceeding concerns switching, rather than loop and transport facilities.

REQUEST NO. 143: Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>BellSouth retail services,</u> including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 144: Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a <u>BellSouth subsidiary or affiliate,</u> including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and

function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 146: Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>UNE loop and transport facilities</u>, including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth notes that this proceeding concerns switching, rather than loop and transport facilities.

REQUEST NO. 147: Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>BellSouth retail services</u>, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 148: Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a <u>BellSouth subsidiary or affiliate</u>, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 149: Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>CLEC UNE-P</u> including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by

producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 11.

REQUEST NO. 150: Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth notes that this proceeding concerns switching, rather than loop and transport facilities.

REQUEST NO. 151: Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for BellSouth retail services, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 152: Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a BellSouth subsidiary or affiliate, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 154: Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing

existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth specifically notes that this docket is focused on switching rather than on loop and transport.

REQUEST NO. 155: Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>BellSouth retail services</u>, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 3, 4 and 7.

REQUEST NO. 156: Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for services offered by a <u>BellSouth subsidiary or affiliate</u>, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1, 3 and 4

REQUEST NO. 157: Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>CLEC UNE-P</u> including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5 and 11.

REQUEST NO. 158: Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for <u>UNE loop and transport facilities</u>, including but not limited to the following: 1) full name of system; 2) acronym for system (if any). To the extent that this interrogatory can be partially or completely answered by

producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. BellSouth notes that this proceeding concerns switching, rather than loop and transport facilities.

REQUEST NO. 159: Please provide a detailed description of any <u>current</u> BellSouth processes that you claim will support <u>batch cuts</u> (as defined in Rule 51.319(d)(2)(ii)) between each of the following service configurations:

a) BellSouth voice only
b) BellSouth voice plus DSL;
c) BellSouth DSL only;
d) CLEC UNE-P voice only;
e) CLEC switch-based voice only;
f) CLEC line sharing;
g) CLEC line splitting;
h) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

Please identify for disclosure all documents or information describing or discussing such processes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 161: Please provide a detailed description of any <u>current</u> BellSouth processes to support <u>individual loop hot cuts</u> between each of the following service configurations:

1) BellSouth voice only
2) BellSouth voice plus DSL;
3) BellSouth DSL only;
4) CLEC UNE-P voice only;
5) CLEC switch-based voice only;
6) CLEC line sharing;
7) CLEC line splitting;
8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

Please identify for disclosure all documents or information describing or discussing such processes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 162: Please provide a detailed description of any <u>planned</u> BellSouth processes to support <u>batch cuts</u> between each of the following service configurations:

    1) BellSouth voice only
    2) BellSouth voice plus DSL;
    3) BellSouth DSL only;
    4) CLEC UNE-P voice only;
    5) CLEC switch-based voice only;
    6) CLEC line sharing;
    7) CLEC line splitting;
    8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

Please identify for disclosure all documents or information describing or discussing such processes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 163: Please provide a detailed description of any <u>planned</u> BellSouth processes to support <u>individual customer hot cuts</u> between each of the following service configurations:

    1) BellSouth voice only
    2) BellSouth voice plus DSL;
    3) BellSouth DSL only;
    4) CLEC UNE-P voice only;
    5) CLEC switch-based voice only;
    6) CLEC line sharing;
    7) CLEC line splitting;
    8) CLEC DSL only [e.g., BellSouth voice only to CLEC UNE-P voice only; CLEC A switch-based voice only to CLEC B switch-based voice only].

Please identify for disclosure all documents or information describing or discussing such processes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 165: Please identify all switches, other than circuit switches, currently in use by cable operators to provide local exchange voice service, and provide the following information:

(a)   the identity of the cable operator;

(b)   the number of units passed (reported separately by residential and business units) by the portion of the cable operator's network capable of supporting local exchange voice service;

(c)   the number of residential units passed by the cable operator's network that are subscribing to cable (video) services;

(d)   the number of residential units passed by the cable operator's network that are subscribing to broadband data services;

(e)   the number of residential units subscribing to cable (video) services that also obtain local exchange voice service from the cable operator;

(f)   the date on which the cable operator first began providing local exchange voice service;

(g)   the price of local exchange voice service provided by the cable operator;

(h)   service quality of local exchange service provided by CMRS operators compared to local exchange service provided by BellSouth (e.g., service outages, dropped calls; E911, etc.);

(i)   maps of the cable operator's serving territories with locations of ILEC central offices or wire centers identified;

(j)   any business cases, analysis, or projections for entry of cable companies into the broadband data and/or local exchange voice markets (whether the information or documents were prepared by you, on your behalf, or by a third party).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 7; specifically, this request seeks information about switches in use by non-party cable operators. MCI should seek to obtain such information from the switch owners.

REQUEST NO. 166: Please identify all switches, other than circuit switches, currently in use by CMRS operators to provide local exchange voice service, and provide the following information:

(a)   the identity of the CMRS operator;

(b)   the number of customers of the CMRS operator who are subscribing to local exchange voice services;

(c)   the number of customers of the CMRS operator who are subscribing to broadband data services;

(d)   the minimum, maximum and average throughput rate for the CMRS operator's broadband data services each month for the last 12 months;

(e)   the date on which the CMRS operator first began providing local exchange voice service;

(f)   the price of local exchange voice service provided by the CMRS operator;

(g)   the service quality of local exchange service provided by the CMRS operator compared to local exchange service provided by BellSouth (e.g., service outages, dropped calls. etc.);

(h)   a description of the entire service territory the CMRS operator can reach;

(i)   the percentage of BellSouth's serving territory (by central office or wire center) that the CMRS operator can reach;

(j)   the percentage of BellSouth's serving territory (by central office or wire center) to which the CMRS operator is providing local exchange voice service;

(k)   the percentage of BellSouth's serving territory (by central office or wire center) to which the CMRS operator is providing broadband data service;

(l)   any business cases, analysis, or projections for entry of CMRS operators into the broadband data and/or local exchange voice markets (whether the information or documents were prepared by you, on your behalf, or by a third party).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 7; specifically, this request seeks information about switches in use by non-party wireless operators. MCI should seek to obtain such information from the wireless owners.

REQUEST NO. 184:   Please provide, on a CLLI-code-specific basis, detailed information concerning copper feeder plant that 1) has been retired since January 1, 2000 or 2) BellSouth plans to or is considering retiring in the next three years.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 185: Please provide, on a CLLI-code-specific basis, detailed information concerning BellSouth's plans over the next three years to use copper feeder plant that has been replaced with fiber-feeder plant, for reinforcement to meet growth needs on shorter all-copper feeder routes.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7.

REQUEST NO. 188: Please provide, on a wire center basis, detailed information concerning dark fiber in the loop plant that is currently available for use by CLECs.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4. This docket concerns switching rather than loop/transport.

REQUEST NO. 189: On a statewide and CLLI-code-specific basis in Kentucky, please state the percentage of working loops used or available to support BellSouth retail services that are configured as "connect through"/"warm line" (i.e., loops that have electrical continuity between the customer premises and the BellSouth switch, and over which a person at the customer premises can call 911 and BellSouth repair service).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4, and 7.

REQUEST NO. 191: With respect to MCI-190, if the collocation rates, terms and/or conditions vary among interconnection agreements, please identify for disclosure each different collocation section.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5.

REQUEST NO. 194: Please provide the non-recurring (including EF&I charges) and monthly recurring charges that BellSouth charges for all elements of all types of collocation.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5.

REQUEST NO. 199: Please state the rates you charge for flat and measured local exchange service for all 1) residential and 2) business customers in Kentucky, and if the rate varies by location, please identify the geographic coverage of the area to which the rate applies (e.g., wire center, rate zone, etc.) and the statewide

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average rate you charge for each category. If the rates you charge vary by central office, please identify the rate that applies to each central office by CLLI code, and the rate zone applicable to each central office.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 5.

REQUEST NO. 200: Please identify the average monthly revenue per line that you consider to constitute low revenue, average revenue and high revenue for 1) residential customers and 2) business customers. Please provide a detailed explanation of whether high revenue customers typically purchase a single service, or a bundle of services, and if they purchase a bundle, which services, features or functions are included in the bundle.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 201: Please identify, by CLLI code, all wire centers for which you receive universal service fund subsidies and provide the following information for each:

(a)   whether the subsidy is from federal or state sources

(b)   the amount of the subsidy on a per loop or per customer basis

(c)   whether the subsidy applies to all customers served by the central office/wire center, or only a portion thereof;

(d)   if the subsidy applies only to a portion of the customers, please provide the number of customers and the percentage of those customers to the total number of customers served in the central office/wire center.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 202: With respect to any subsidies that you contend are implicit and/or explicit in your Kentucky retail rates for any service, please:

(a)   identify and describe the service;

(b)   state separately the amount of the subsidy you contend is implicit and/or explicit in the non-recurring and monthly recurring rates for the service;

(c)   identify for disclosure all cost studies, calculations, and other materials that directly support your contention that the service is implicitly and/or explicitly being subsidized.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 203: With respect to each of the two customer categories identified in response to MCI-169, please provide the following:

(a)   all categories and amounts of costs arising from providing local exchange service to each customer category (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);

(b)   the average total monthly revenues earned per line since July 1, 2001 for each customer category, reported by wire center, MSA and LATA.

(c)   the source of all revenues derived from each category loop identified in subpart (b) by service and/or feature type (i.e., local voice only, local voice plus vertical features, local long distance only, DSL only, bundles of any of the above, and/or other services or features).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 205: For each type of digital loop carrier ("DLC") equipment deployed by BellSouth in Kentucky, please provide BellSouth's equipment capital costs for minimum, average and maximum configurations, in terms of number of lines supported.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4

REQUEST NO. 206: For each type of digital loop carrier ("DLC") equipment deployed by BellSouth in Kentucky, please provide BellSouth's Engineered, Furnished and Installed ("EF&I") costs for minimum, average and maximum configurations, in terms of number of lines supported.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4

REQUEST NO. 207: Please provide all non-recurring and recurring rates and charges applicable in Kentucky for UNE loops of all types as found in:

(a)   intrastate tariffs

(b)   interstate tariffs

(c)   currently effective Interconnection Agreement(s) with CLEC(s)

(d)   your Statement of Generally Available Terms ("SGAT").

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 208: Please provide all non-recurring and recurring rates and charges applicable in Kentucky for UNE transport of all types as found in:

(a)   intrastate tariffs

(b)   interstate tariffs

(c)   currently effective Interconnection Agreement(s) with CLEC(s)

(d)   your Statement of Generally Available Terms ("SGAT").

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 209: Please identify for disclosure all business cases, business analysis, cost studies, or other analyses or evaluations concerning whether entry into the mass market is economically feasible without access to BellSouth's switches, including those analyses and studies that were submitted to the FCC, performed but not submitted to the FCC, and performed since February 22, 2003. Please identify for disclosure all supporting documentation and work papers, in electronic format if available.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 7 and 10.

REQUEST NO. 213: Please identify for disclosure all documents addressing BellSouth currently offered bundles of the following: a) business local exchange and long distance services, b) residential local exchange and long distance services, c) business local exchange, long distance and broadband/DSL services, d) residential local exchange, long distance and broadband/DSL services; e) residential local exchange and DSL; and f) business local exchange and DSL.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 214: Please identify for disclosure all documents addressing BellSouth planned bundling of the following: a) business local exchange and long distance services, b) residential local exchange and long distance services, c) business

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local exchange, long distance and broadband/DSL services, d) residential local exchange, long distance and broadband/DSL services; e) residential local exchange and DSL; and f) business local exchange and DSL.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 218: On a CLLI-code-specific basis in Kentucky, please provide the BellSouth's demand growth or decline for each of the <u>last three years</u> for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 219: On a CLLI-code-specific basis in Kentucky, please provide BellSouth's <u>current</u> in-service quantities for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 220: On a CLLI-code-specific basis in Kentucky, please provide BellSouth's expected, estimated or forecasted demand growth or decline for each of the <u>next three years</u> for each of the following BellSouth retail services: primary business voice lines, primary residential voice lines, additional business voice lines, additional residential voice lines, standalone DSL lines, BellSouth DSL service provisioned in the high frequency portion of a loop that also supports

BellSouth narrowband analog voice service, CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service, and CLEC DSL service provisioned in the high frequency portion of a loop that also supports CLEC narrowband analog voice service. To the extent that this interrogatory can be partially or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 224: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for local exchange service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 225: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 226: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for broadband service (i.e., DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 227: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for bundled local and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 228: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for <u>bundled local, long distance, and broadband service</u> (i.e., DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 230: Please provide BellSouth's calculation and/or estimate of its <u>variable</u> costs for providing <u>local exchange service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 231: Please provide BellSouth's calculation and/or estimate of its <u>marginal</u> costs for providing <u>local exchange service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 232: Please provide BellSouth's calculation and/or estimate of its <u>variable</u> costs for providing <u>long distance service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 233: Please provide BellSouth's calculation and/or estimate of its <u>marginal</u> costs for providing <u>long distance service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 234: Please provide BellSouth's calculation and/or estimate of its variable costs for providing broadband service (i.e. DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 235: Please provide BellSouth's calculation and/or estimate of its marginal costs for providing broadband service (i.e. DSL), stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 236: Please provide BellSouth's calculation and/or estimate of its variable costs for providing bundled local exchange and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 1.

REQUEST NO. 237: Please provide BellSouth's calculation and/or estimate of its marginal costs for providing bundled local exchange and long distance service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 1.

REQUEST NO. 238: Please provide BellSouth's calculation and/or estimate of its variable costs for providing bundled local exchange, long distance and broadband service, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 1.

REQUEST NO. 239: Please provide BellSouth's calculation and/or estimate of its marginal costs for providing <u>bundled local exchange, long distance and broadband service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please identify for disclosure all supporting documentation for such calculations and/or estimates.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 1.

REQUEST NO. 240: Please state whether BellSouth has any affiliates or subsidiaries that provide local exchange voice services, long distance voice services and/or DSL services. If the response for any of these services is affirmative, please provide the full name of the affiliate or subsidiary and a list of the service(s) provided by the affiliate or subsidiary.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 1 and 4.

REQUEST NO. 241: Please identify for disclosure each executed contract (including attachments and/or amendments) between BellSouth and a long distance carrier for inter-LATA services and/or facilities.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 242: With respect to each contract requested in MCI-241, please provide the total minutes of use, and/or total transport capacity purchased, as well as the total dollar amount paid for such minutes of use and/or transport capacity, stated on a quarterly basis for the past three years.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 243: Please provide all calculations or estimates in BellSouth's custody or control of BellSouth's current total and component (e.g., debt, preferred stock, equity, etc.) cost of capital, based on each of the following: a) market capital structure, b) book capital structure, and c) target capital structure. Please identify for disclosure all supporting documentation, including the documents relied upon to answer this question.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 244: With respect to the cost of capital calculations or estimates requested in MCI-243, please provide such calculations or estimates for BellSouth's major types of service, at the most granular level available, including

the following: a) residential local exchange service, b) business local exchange service, c) long distance service, d) DSL service and e) unbundled network elements (UNEs). Please identify for disclosure all supporting documentation, including the documents relied upon to answer this question.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 246: Please describe in detail any legal, regulatory or other constraints on BellSouth's ability to target price reductions to specific geographic areas, and 2) to types of customers (including individual customers) for each of the following: a) business local exchange service, b) residential local exchange service, c) long distance service and d) DSL service.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 247: Please describe in detail any price floors imposed by any law, regulation, PSC orders or rulings that constrain BellSouth's ability to reduce prices for each of the following: a) business local exchange service, b) residential local exchange service, c) long distance service and d) DSL service. For each such price floor, provide the basis for the calculation for the price floor (e.g., price freeze, cost-based calculation, etc.).

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4 and 5.

REQUEST NO. 248: Please provide average total revenue for each BellSouth wire center in Kentucky.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

REQUEST NO. 250: For each CLLI code in Kentucky, please provide average revenues per line for (1) residential voice-only customers; (2) residential voice plus DSL customers; (3) business DS-0/voice grade customers; (4) business DS-0/voice grade customers; for local service, vertical features, and voice mail. For customers in each of these four categories who also subscribe to BellSouth long distance service, provide the average long distance revenues per line.

OBJECTION: BellSouth incorporates by reference as if fully stated herein the following General Objections: 4.

Respectfully submitted,

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