

REQUEST: Describe BellSouth's ordering requirements of CLECs for requests to purchase switching from a wholesale provider (e.g. another CLEC) and purchase an unbundled loop from BellSouth. Describe in detail *any* differences between these requirements and BellSouth's ordering requirements of CLEC's requests to purchase an unbundled loop for use with its own (CLEC) switch. If any part of BellSouth's response directs AT&T to a document/documents on BellSouth's website, include specific page numbers of the document/documents in which the answer is located.

RESPONSE: BellSouth does not have ordering requirements of CLECs for requests to purchase switching from a wholesale provider *and* purchase an unbundled loop from Bellsouth on the same LSR. There is no difference as to how a loop is ordered, whether the CLEC provides their own switching or purchases it from a wholesale provider (e.g. another CLEC).

REQUEST: Describe BellSouth's provisioning requirements of CLECs for requests to purchase switching from a wholesale provider (e.g. another CLEC) and purchase an unbundled loop from BellSouth. Describe in detail *any* differences between these requirements and BellSouth's provisioning requirements of CLEC's requests to purchase an unbundled loop for use with its own (CLEC) switch. If any part of BellSouth's response directs AT&T to a document/documents on BellSouth's website, include specific page numbers in which the answer is located.

RESPONSE: BellSouth's provisioning process would be the same whether switching is supplied by AT&T or by another CLEC. See BellSouth's response to AT&T's First Request for Production, Item No. 7.

REQUEST: For each day between January 2002 and September 2003, or for the latest period for which information is available, and for each CO identified in answer to Interrogatory No. 1, provide the number access lines migrated to UNE-P that have been completed by BellSouth, disaggregated as follows:

- (a) the total number of access lines migrated to UNE-P;
- (b) the total number of access lines migrated from BellSouth retail to UNE-P;
- (c) the total number of access lines migrated from resale to UNE-P; and
- (d) the total number of access lines migrated from UNE-L to UNE-P.

RESPONSE: BellSouth previously provided information concerning migration activity in its First Supplemental Response to AT&T Interrogatory No. 4 filed on December 8, 2003.

REQUEST: Has BellSouth conducted any studies to indicate that it can meet the future demand for hot cuts that would be caused by an elimination of unbundled switching? If yes, please provide all documents related to the study.

RESPONSE: The LCSC and CWINS organizations use sophisticated force models to ensure that their operations are adequately staffed to meet anticipated CLEC demand. BellSouth's sustained level of performance for both UNE loops and hot cuts validates that the current force models have been successful in meeting CLEC service order demand with quality and reliability.

REQUEST: For each day between January 2002 and September 2003, or for the latest period for which information is available, and for each CO identified in answer to Interrogatory No. 1, provide the number of access lines migrated away from CLECs to BellSouth retail that have been completed by BellSouth, disaggregated as follows:

- (a) the total number access lines on UNE-P migrated from CLECs to BellSouth retail;
- (b) the total number access lines on UNE-L migrated from CLECs to BellSouth retail; and
- (c) the total number access lines on resale migrated from CLECs to BellSouth retail.

RESPONSE: BellSouth previously provided information concerning migration activity in its First Supplemental Response to AT&T Interrogatory No. 4 filed on December 8, 2003.

REQUEST: BellSouth's response to Interrogatory No. 20, in Attachment 20 provides the number and percentage of copper loop serving arrangements. For each such entry in Attachment 20, provide the number of percentage of such loops converted to T1 (DS1) level interfaces through the use of DLCs located in the central office before they enter the local switch.

RESPONSE: This question cannot be answered as posed because any multiplexing of copper subloops (that is, individual copper loop distribution pairs) onto DS1 or higher level digital transmission facilities occurs at the DLC Remote Terminal ("RT"), rather than within the central office.

In reference to BellSouth Attachment 20, for 100% of the loops served by "UDLC", "IDLC", "UNGDL", and "INGDL", the individual loop distribution pairs are multiplexed onto digital transmission facilities at the respective RT.

REQUEST: For each switch located within the central offices identified in response to Interrogatory No. 1, provide the following information:

- (a) the percentage of originating calls completed to other subscribers on the switch (intra-office calls);
- (b) the percentage of originating calls completed to other "local" subscribers (inter-office local calls);
- (c) the percentage of originating calls competed to intra-LATA toll destinations (intra-LATA toll calls); and
- (d) the percentage of originating calls competed to inter-LATA toll destinations, a single total percentage:
 - (i) Inter-LATA, intra-state plus;
 - (ii) Inter-LATA inter-state plus; and
 - (iii) International (inter-LATA toll calls).

RESPONSE: BellSouth objects to Interrogatory No. 119 on the grounds that it is overly broad, unduly burdensome, and oppressive. BellSouth estimates that responding to this Interrogatory would require BellSouth to pull 96,000 records and there is no existing program in place to pull this data. Consequently, to retrieve this data, BellSouth would have to develop specific software at an estimated cost of tens of thousands of dollars.