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REQUEST: Please list each and every transport route which you contend should be removed from the list of available DS-1 UNEs pursuant to FCC Rules §51.319(e)(1)(ii) [existence of competitive wholesale facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 1, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 1, please provide the following information:

    a)   the type of terminating facility (e.g., collocation) used at each end of the route and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.);

    b)   the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

    c)   identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS1 transport along the particular route;

    d)   the terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory (as to subpart a) to the extent that the requested 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. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective

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RESPONSE: (continued)

agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(i)(A) [existence of alternative self-provisioned facilities.] For each listed route, please list:

        a)   the CLLI code identifications of the endpoints;

        b)   the identities of each claimed alternative competitive provider.

RESPONSE: BellSouth objects to (subpart b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 4, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 4, please provide the following information:

(a) the type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.);

(b) the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

(c) identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated DS-3 transport along the particular route.

RESPONSE: BellSouth objects to this interrogatory (as to subpart a) to the extent that the requested 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. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(i)(B) [existence of competitive wholesale facilities.]   For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information.   To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so.   (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 7, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 7, please provide the following information:

(a)   the type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.);

(b)   the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

(c)   identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 transport along the particular route;

(d)   the terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider;

RESPONSE: BellSouth objects to this interrogatory (as to subpart a) to the extent that the requested 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.   BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective

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RESPONSE:　　　(continued)

　　　　　agreement, subject to any other general and specific objections
　　　　　contained herein, BellSouth cannot disclose customer proprietary
　　　　　network information ("CPNI") to MCI unless a customer consents to
disclosure or BellSouth is ordered to do so.　(See 47 C.F.R. Section
64.2007 for CPNI rules).　Subject to and without waiving the
aforementioned objection, BellSouth states that in preparation of its case
in this matter, it is still investigating the information responsive to this
request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(ii) [potential deployment of alternative facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of any identified alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 10, please identify for disclosure all information in your possession relating to:

    (a)   local engineering costs of building and utilizing transmission facilities

    (b)   the cost of underground or aerial laying of fiber or copper;

    (c)   the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service;

    (d)   relevant local topography such as hills and rivers;

    (e)   availability of reasonable access to rights-of-way;

    (f)   availability/feasibility of similar quality/reliability alternative transmission technologies along the particular route;

    (g)   customer density and addressable market; and

    (h)   existing facilities-based competition.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart i) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 10 and for each provider of any existing facilities-based competition listed in your response to Interrogatory No. 11(h), indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(i)(A) [existence of alternative self-provisioned facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 13, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 13, please
             provide the following information:

    (a)   the type of terminating facility (i.e., collocation) used at each end
             and a copy of the authority by which that facility is governed (i.e.,
             tariff pages, collocation contract, or interconnection agreement;
    (b)   the exact route of each claimed alternative facility, including the
             owner of each facility segment, its date of installation and date of
             initial operation, the nature of the alternative competitive
             provider's ownership/occupancy rights (i.e., "fee simple
             ownership", "IRU", etc.), and the identity of any underlying
             owners or interest holders in the facility;
    (c)   identify for disclosure any and all documents you have that state
             that each claimed alternative competitive provider is operationally
             ready to use the listed transport facilities to provide dedicated Dark
             Fiber transport along the particular route.

RESPONSE: BellSouth objects to this interrogatory (as to subpart a) to the extent that
            the requested 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.   BellSouth also objects to this Interrogatory on
            grounds that it is unduly burdensome, overly broad, and oppressive as
            written. Further, BellSouth objects (as to subpart b) to the extent that this
            interrogatory seeks information that constitutes a trade secret or would
            require the disclosure of customer specific information. To the extent that
            MCI requests proprietary confidential information, BellSouth will make
            such information available in accordance with the parties protective
            agreement, subject to any other general and specific objections contained
            herein, BellSouth cannot disclose customer proprietary network
            information ("CPNI") to MCI unless a customer consents to disclosure or
            BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI
            rules).   Subject to and without waiving the aforementioned objection,
            BellSouth states that in preparation of its case in this matter, it is still
            investigating the information responsive to this request and will
            supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(i)(B) [existence of competitive wholesale facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information.   To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so.   (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 16, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 16, please provide the following information:

(a)   the type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)

(b)   the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility.

(c)   identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated Dark Fiber transport along the particular route.

(d)   the terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory (as to subpart a) to the extent that the requested 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. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained

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RESPONSE: (continued)

herein, BellSouth cannot disclose customer proprietary network
information ("CPNI") to MCI unless a customer consents to disclosure or
BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI
rules). Subject to and without waiving the aforementioned objection,
BellSouth states that in preparation of its case in this matter, it is still
investigating the information responsive to this request and will
supplement its response as soon as practicable.

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REQUEST: Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(ii) [potential deployment of alternative facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of any identified alternative competitive provider.

RESPONSE: BellSouth objects to subpart (b) of this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each route listed in your response to Interrogatory No. 19, please identify for disclosure all information in your possession relating to:

(a)   local engineering costs of building and utilizing transmission facilities;

(b)   the cost of underground or aerial laying of fiber or copper;

(c)   the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service;

(d)   relevant local topography such as hills and rivers;

(e)   availability of reasonable access to rights-of-way;

(f)   availability/feasibility of similar quality/reliability alternative transmission technologies along the particular route;

(g)   customer density and addressable market; and

(h)   existing facilities-based competition.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart h) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 20(h) and for each provider of any existing facilities-based competition listed in your response to 0(h), indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please describe and identify for disclosure all supporting documents for any state or locally enacted or enforced barriers to entry by competing providers of DS-1, DS-3, OC-n, or Dark Fiber transport, including, but not limited to, any moratoria or restrictions on construction or access to rights of way. Include all relevant legal provisions and a description of any BellSouth deployment or construction projects which have been undertaken since the enactment of the restriction or moratoria. Describe the steps taken or qualifications met in order for the identified BellSouth projects to either comply with or avoid the effects of the restriction or moratoria.

RESPONSE: BellSouth is unaware of any state or localities in the BellSouth region that have a moratoria or restrictions on construction or right of way access, except for "restrictions" that are part of the usual permit process.

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REQUEST: For each route identified in your responses to Interrogatories 1 through 19, please provide the following information, or identify it for disclosure:

  (a)   all forecasts of BellSouth expected, estimated, anticipated, or forecasted demand growth or decline for all classes of transport service. To the extent you have information disaggregated by type of customer or demand (e.g., "business", "data", "UNE", "special access", or other categories) please provide such disaggregated figures. To the extent different documents may provide differing figures, estimates, or forecasts based upon the impact or implementation of any regulatory or judicial action (including, but not limited to, the *Triennial Review Order* and related proceedings) provide all such figures, estimates, and forecasts, identifying which relate to which different regulatory or judicial outcomes;

  (b)   BellSouth's current transport capacity utilization, including total number and type of fibers or copper cabling;

  (c)   number of "unlit" or "dark" fibers;

  (d)   number of "lit" fibers with the current operational level implemented for each (i.e., which OC level);

  (e)   current utilization of copper wire, if any, including identification and capacity of implemented digital and analog transmission capability;

  (f)   identification of unused copper facilities, if any.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please provide the following information for each fiber or conduit deployment project by BellSouth in Kentucky since January 1, 2000:

    (a)   type, size, and capacity of conduit installed along all or any separate portion of the route;

    (b)   type and number of fibers initially installed along all or any separate portion of the route;

    (c)   type and number of fibers for each and every subsequent installation along all or any portion of the route;

    (d)   all available budgetary and actual cost data for both initial and any subsequent installations, including all costs for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written.

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REQUEST: Please provide the following information for each planned fiber or conduit deployment project by BellSouth in Kentucky for the next 3 years: (Include in this response any current projects not included in T-111, as well as future projects.)

(a)   type, size, and capacity of conduit to be installed along all or any separate portion of the route;

(b)   type and number of fibers to be initially installed along all or any separate portion of the route,

(c)   type and number of fibers for each and every planned subsequent installation along all or any portion of the route;

(d)   all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written.

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REQUEST: Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which BellSouth:

    (a)   sells, rents, leases, or otherwise provides telecommunications transport services between its switches and/or wire centers to others in Kentucky;

    (b)   buys, rents, leases, or otherwise acquires telecommunications transport services between its switches and/or wire centers from others in Kentucky.

RESPONSE: (a)   The rates, terms and conditions for transport services provided by BellSouth in Kentucky are set forth in BellSouth's tariffs and interconnection agreements which are publicly available.

            (b)   BellSouth is currently unaware of any situations in Kentucky where BellSouth is purchasing transport services from others, except in connection with the transport and termination of traffic exchanged between BellSouth and another carrier. The rates, terms and conditions for such transport and termination services are set forth in tariffs and interconnection agreements, which are publicly available.

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REQUEST: With respect to all documents identified in your response to Interrogatory No. 26, please provide quarterly totals for the last 3 years of the amount of transport capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. BellSouth further objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules).

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REQUEST: Please describe in detail any price floors or other limitation imposed by any law, regulation, [PUC] orders or rulings that constrain BellSouth's ability to reduce prices for each of the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Additionally, BellSouth objects to this interrogatory to the extent that the requested information is already a matter of public record or is otherwise publicly available.

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REQUEST: Please provide a description and identify for disclosure all supporting documentation for all BellSouth <u>currently offered</u> bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: Please provide a description and identify for disclosure all supporting documentation for all BellSouth <u>planned or contemplated</u> bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: Please identify for disclosure all documents that address or assess the risk of stranded transport capacity on all or any portion of BellSouth's existing network in Kentucky.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the foregoing objections, BellSouth states that it is not aware of any documents that address or assess the risk of stranded transport capacity on BellSouth's existing network in Kentucky.

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REQUEST: For this and the immediately following four questions, the phrase "lit enterprise circuit(s)" means one or more circuits at the DS-1, DS-3, or OC-x capacity levels. Please describe all your current procedures for moving portions of lit enterprise circuits from your own network to a CLEC or IXC network. Include all procedures for circuits which serve multiple end-users by virtue of connection to multiple BellSouth "tail circuits" or "loops" via BellSouth provided MUX or DACS equipment.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: When a lit enterprise circuit provided by BellSouth under UNE procedures or Special Access tariffs serves multiple end-user customers through BellSouth provided MUX or DACS equipment, will BellSouth perform a "hot cut" of all or part of the lit enterprise circuit portion to non-BellSouth provided transport?

(a) If no, why not?

(b) If yes, will BellSouth perform this function based on a single Access Service Request ("ASR") submission by the carrier customer or does BellSouth require multiple ASRs? If the answer is that a single ASR is acceptable, please identify any prior periods when multiple ASRs were required.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: As part of any required transition from UNE enterprise circuit transport to non-BellSouth transport, will BellSouth perform a "hot cut" of all or part of any lit enterprise circuit portion to non-BellSouth provided transport?

    (a) If no, why not?

    (b) If yes, will BellSouth perform this function based on a single service request, or will BellSouth require separate requests for each end-user circuit?

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: Has BellSouth ever imposed restrictions on the number of lit enterprise circuits it would transition from the BellSouth network to the networks of others? If yes, state all such restrictions imposed and all terms of such restrictions (i.e., any specifics as to numbers of such transitions within a specific time and/or region; conditions as to time "out of service"; any required impositions of unfavorable customer conditions; any mandatory classification of any such transition as "project work" [or other non-standard undertaking] thereby changing or avoiding any otherwise applicable service guarantees, performance standards, or terms ensuring quality of service, etc.)

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please identify for disclosure all internal methods & procedures, business rules, memoranda, communications, e-mail, reports, etc. which describe in any way issues related to the migration of lit enterprise circuits or circuit portions from the BellSouth network to any non-BellSouth network. In addition, if not already encompassed in the prior sentence, also identify for disclosure all such documents which discuss any potential means of discouraging such moves, or any complaints or comments received relating to procedures used to undertake such moves, or any refusals of such moves.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please state the proportion of "unlit" or "dark" fiber in loop feeder and distribution plant a) for each of the last 5 years; b) currently; and c) all projections for the next 3 years.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the foregoing objections, BellSouth states that it does not historically track unlit fiber, nor does it make future projections concerning unlit fiber. With respect to the proportion of unlit fiber currently in BellSouth's loop feeder and distribution plant, such information is not readily available because BellSouth does not have a mechanized inventory system from which such information could be extracted.

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REQUEST: Please state the "OCn" level at which fiber in the loop feeder and distribution plant has been, is being, or will be operated:

(a)   for each of the last 3 years;

(b)   currently; and

(c)   all projections for the next 3 years.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the foregoing objections, BellSouth states the following:

(a)   BellSouth does not retain historical information responsive to this request;

(b)   BellSouth uses OC3 and OC12 in its feeder network. BellSouth's distribution plant does not use OCn, but rather uses a proprietary signal;

(c)   BellSouth does not perform projections of loop feeder and distribution plant.

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REQUEST: Please describe and supply supporting documentation for any change in the last three years, and any change currently in progress, in deployment plans or schedules which would tend to either a) lower or reduce the future transmission ("OCn") level of any fiber in the loop feeder and/or distribution plant; b) reduce any expected, anticipated, or planned increases in the future transmission ("OCn") level of any fiber in the loop feeder and/or distribution plant; c) increase the number of fibers used at any point in the loop feeder and/or distribution plant; or d) reduce the number of "unlit" fibers available for provision of "dark fiber" to others.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: Please define "customer location" and "customer premises" in the context of enterprise UNE loop impairment analyses.   Are these terms synonymous in your view? If not, please describe in detail your view of the differences in these terms with respect to DS-1, DS-3, and Dark Fiber UNE loops.

RESPONSE: For purposes of the impairment analysis, it is apparent that the FCC uses "location" and "premises" interchangeably to refer to a particular building whether occupied by an individual customer or multiple customers (as in multiunit premises). Thus, BellSouth uses the terms interchangeably.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available DS-1 UNE loop destinations pursuant to FCC Rules §51.319(a)(4)(ii) [existence of competitive wholesale facilities.] For each listed location, please list:

(a)   the CLLI code identification of the network endpoint;

(b)   the identities of each claimed alternative competitive provider;

(c)   the exact location of the customer endpoint;

(d)   all persons owning an interest in or controlling access to the customer location;

(e)   whether the location is a single-tenant or multi-tenant facility;

(f)   identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g)   whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h)   whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i)   whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j)   what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information.   To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so.   (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 41, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 41, please provide the following information:

(a)   the type of alternative loop provisioned and made available;

(b)   the exact location of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

(c)   identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS1 loop facilities at the specified location;

(d)   the terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access to the facilities of the alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory (as to subpart d) to the extent that the requested 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. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or

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RESPONSE: (continued)

BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(i)(A) [existence of alternative self-provisioned facilities.] For each listed location, please list:

(a) the CLLI code identifications of the network endpoint;

(b) the identities of each claimed alternative competitive provider;

(c) the exact location of the customer endpoint;

(d) all persons owning an interest in or controlling access to the customer location;

(e) whether the location is a single-tenant or multi-tenant facility;

(f) identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 44, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 44, please provide the following information:

        (a)   the type of alternative loop provisioned and made available;

        (b)   the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

        (c)   identify for disclosure any and all documents in your possession, custody, or control that state that each claimed alternative competitive provider is operationally ready to use the listed loop facilities to provide dedicated DS-3 loop facilities at the specified location.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(i)(B) [existence of competitive wholesale facilities.] For each listed location, please list:

(a)   the CLLI code identification of the network endpoint;

(b)   the identities of each claimed alternative competitive provider;

(c)   the exact location of the customer endpoint;

(d)   all persons owning an interest in or controlling access to the customer location;

(e)   whether the location is a single-tenant or multi-tenant facility;

(f)   identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g)   whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h)   whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i)   whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j)   what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 47, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 47, please provide the following information:

(a)   the type alternative loop provisioned and made available;

(b)   the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

(c)   identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 loop facilities at the specified location;

(d)   the terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory (as to subpart d) to the extent that the requested 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. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or

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RESPONSE: (continued)

BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(ii) [potential deployment of alternative facilities.] For each listed location, please list:

(a) the CLLI code identifications of the network endpoint;

(b) the identities of any identified alternative competitive provider;

(c) the exact location of the customer endpoint;

(d) all persons owning an interest in or controlling access to the customer location;

(e) whether the location is a single-tenant or multi-tenant facility;

(f) identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 50, please identify for disclosure all documents and information in your possession, custody or control relating to:

(a)   local engineering costs of building and utilizing loop facilities;
(b)   the cost of underground or aerial laying of fiber or copper;
(c)   the cost of equipment needed for loop facilities; installation and other necessary costs involved in setting up service;
(d)   relevant local topography such as hills and rivers;
(e)   availability of reasonable access to rights-of-way;
(f)   availability/feasibility of similar quality/reliability alternative loop technologies along the particular route;
(g)   customer density and addressable market; and
(h)   existing facilities-based competition.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart h) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to 0 and
for each provider of any existing facilities-based competition listed in your
response to 0(h), indicate whether it is an "affiliate" (as defined in 47 USC
§153(1)) of BellSouth or of any other listed alternative competitive
provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks
information that constitutes a trade secret or would require the disclosure
of customer specific information.   To the extent that MCI requests
proprietary confidential information, BellSouth will make such
information available in accordance with the parties protective agreement,
subject to any other general and specific objections contained herein,
BellSouth cannot disclose customer proprietary network information
("CPNI") to MCI unless a customer consents to disclosure or BellSouth is
ordered to do so.   (See 47 C.F.R. Section 64.2007 for CPNI rules).
Subject to and without waiving the aforementioned objection, BellSouth
states that in preparation of its case in this matter, it is still investigating
the information responsive to this request and will supplement its response
as soon as practicable.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(a)(6)(i) [existence of alternative self-provisioned facilities.] For each listed location, please list:

(a)   the CLLI code identifications of the network endpoint;

(b)   the identities of each claimed alternative competitive provider;

(c)   the exact location of the customer endpoint;

(d)   all persons owning an interest in or controlling access to the customer location;

(e)   whether the location is a single-tenant or multi-tenant facility;

(f)   identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g)   whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h)   whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i)   whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j)   what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 53, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 53, please provide the following information:

(a) the type of alternative loop provisioned and made available;

(b) the exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "IRU", etc.), and the identity of any underlying owners or interest holders in the facility;

(c) identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is operationally ready to use the listed loop facilities to provide dedicated Dark Fiber loop facilities at the specified location.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please list each and every customer location which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(a)(6)(ii) [potential deployment of alternative facilities.] For each listed location, please list:

(a)   the CLLI code identifications of the network endpoint;

(b)   the identities of each claimed alternative competitive provider;

(c)   the exact location of the customer endpoint;

(d)   all persons owning an interest in or controlling access to the customer location;

(e)   whether the location is a single-tenant or multi-tenant facility;

(f)   identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;

(g)   whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

(h)   whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;

(i)   whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;

(j)   what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

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RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart b) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each location listed in your response to Interrogatory No. 56, please identify for disclosure all documents and information in your possession, custody or control relating to:

    (a)   local engineering costs of building and utilizing loop facilities;

    (b)   the cost of underground or aerial laying of fiber or copper;

    (c)   the cost of equipment needed for loop facilities; installation and other necessary costs involved in setting up service;

    (d)   relevant local topography such as hills and rivers;

    (e)   availability of reasonable access to rights-of-way;

    (f)   availability/feasibility of similar quality/reliability alternative

    (g)   loop technologies along the particular route;

    (h)   customer density and addressable market; and

    (i)   existing facilities-based competition.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Further, BellSouth objects (as to subpart h) to the extent that this interrogatory seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: For each alternative competitive provider listed in your response to Interrogatory No. 56 and for each provider of any existing facilities-based competition listed in your response to 0(h), indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

RESPONSE: BellSouth objects to this interrogatory to the extent that it seeks information that constitutes a trade secret or would require the disclosure of customer specific information. To the extent that MCI requests proprietary confidential information, BellSouth will make such information available in accordance with the parties protective agreement, subject to any other general and specific objections contained herein, BellSouth cannot disclose customer proprietary network information ("CPNI") to MCI unless a customer consents to disclosure or BellSouth is ordered to do so. (See 47 C.F.R. Section 64.2007 for CPNI rules). Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please describe and identify for disclosure all supporting documents for any state or locally enacted or enforced limitations on or barriers to entry by competing providers of DS-1, DS-3, OC-n, or Dark Fiber loop, including, but not limited to, any moratoria or restrictions on construction or access to rights of way. Include all relevant legal provisions and a description of any BellSouth deployment or construction projects which have been undertaken since the enactment of the restriction or moratoria. Describe the steps taken or qualifications met in order for the identified BellSouth projects to either comply with or avoid the effects of the restriction or moratoria.

RESPONSE: BellSouth is unaware of any state or localities in the BellSouth region that have a moratoria or restrictions on construction or right of way access, except for "restrictions" that are part of the usual permit process.

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REQUEST: For each location identified in your response to Interrogatory Nos. 41 through 56, please provide or identify for disclosure the following information:

   (a)   All forecasts of BellSouth expected, estimated, anticipated, or forecasted demand growth or decline for all classes of loop facilities. To the extent you have information disaggregated by type of customer or demand (e.g., "business", "data", "UNE", "special access", or other categories) please provide such disaggregated figures. To the extent different documents may provide differing figures, estimates, or forecasts based upon the impact or implementation of any regulatory or judicial action (including, but not limited to, the *Triennial Review Order* and related proceedings) identify for disclosure all such documents and provide all such figures, estimates, and forecasts, identifying which relate to which different regulatory or judicial outcomes;

   (b)   BellSouth's current loop capacity utilization, including total number and type of fibers or copper cabling;

   (c)   number of "unlit" or "dark" fibers;

   (d)   number of "lit" fibers with the current transmission level implemented for each (i.e., which OCn level);

   (e)   current utilization of copper wire, if any, including identification and capacity of implemented digital and analog loop capability;

   (f)   identification of unused copper facilities, if any.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving

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RESPONSE: (continued)

the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please provide and identify for disclosure all documents supporting the
following information for each fiber or conduit deployment project by
BellSouth in Kentucky since January 1, 2000:

(a)   type, size, and capacity of conduit installed along all or any
separate portion of the route;

(b)   type and number of fibers initially installed along all or any
separate portion of the route;

(c)   type and number of fibers for each and every subsequent
installation along all or any portion of the route;

(d)   all available budgetary and actual cost data for both initial and any
subsequent installations, including all costs for permits, authority,
ROW, lobbying, public policy, excavation, trenching, boring,
backfill, surface repair, remediation, vault construction,
termination, payments-in-kind, related usage rights, materials
(including conduit and cabling), and any other expenses necessary
to the project.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is
not reasonably calculated to lead to the discovery of admissible evidence
and it is not relevant to the subject matter of this action. BellSouth also
objects to this Interrogatory on grounds that it is unduly burdensome,
overly broad, and oppressive as written.

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REQUEST: Please provide and identify for disclosure all documents supporting the following information for each planned fiber or conduit deployment project by BellSouth in Kentucky for the next 3 years: (Include in this response any current projects not included in Interrogatory No. 61, as well as future projects.)

      (a)   type, size, and capacity of conduit to be installed along all or any separate portion of the route;

      (b)   type and number of fibers to be initially installed along all or any separate portion of the route;

      (c)   type and number of fibers for each and every planned subsequent installation along all or any portion of the route;

      (d)   all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written.

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REQUEST: Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which BellSouth:

    (a)   sells, rents, leases, or otherwise provides telecommunications loop facilities to others in Kentucky;

    (b)   buys, rents, leases, or otherwise acquires loop facilities from others in Kentucky.

RESPONSE: (a)   The rates, terms and conditions for loop facilities provided by BellSouth in Kentucky are set forth in BellSouth's tariffs and interconnection agreements which are publicly available.

    (b)   BellSouth is unaware of any situation where BellSouth is currently buying, renting, or leasing loop facilities from another carrier in Kentucky.

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REQUEST: With respect to all documents identified in your response to Interrogatory No. 63, please provide quarterly totals since January 1, 2000 of the amount of loop capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to and without waiving the aforementioned objection, BellSouth states that in preparation of its case in this matter, it is still investigating the information responsive to this request and will supplement its response as soon as practicable.

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REQUEST: Please describe in detail any price floor(s) or other limitation(s) imposed by any law, regulation, [PUC] orders or rulings that constrain BellSouth's ability to reduce prices for each of the following:

    (a)   dark fiber loop service;

    (b)   OC-n level loop service;

    (c)   DS-3 loop service; and

    (d)   DS-1 loop service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).

RESPONSE: BellSouth objects to MCI's 1st Interrogatories, No. 65 on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Further, BellSouth objects to providing information to the extent that such information is already a matter of public record or is otherwise publicly available.

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REQUEST: Please provide a description and identify for disclosure all documentation for all BellSouth <u>currently offered</u> bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written.

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REQUEST: Please provide a description and identify for disclosure all supporting documentation for all BellSouth <u>planned or contemplated</u> bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written.

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REQUEST: 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 lines to a single customer premises; business with more than three DS-0/voice grade lines to a single customer premises);

(b) 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);

(c) 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.

RESPONSE:

BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to these objections, and without waiving these objections, the information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Set of Interrogatories, Item No. 1 in AL Dkt. No. 29054.

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BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
MCI/WorldCom's 2nd Set of Data Requests
November 24, 2003
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REQUEST: 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>residential local exchange customers</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].

RESPONSE:

BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to these objections, and without waiving these objections, see BellSouth's Response to MCI's First Set of Interrogatories, Item No. 1.

BellSouth Telecommunications, Inc.
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REQUEST: 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].

RESPONSE:

BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to these objections, and without waiving these objections, see BellSouth's Response to MCI's First Set of Interrogatories, Item No. 1.

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: 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 business local exchange voice customers with more than three lines 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].

RESPONSE:

BellSouth objects to this Interrogatory on grounds that the information is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to these objections, and without waiving these objections, see BellSouth's Response to MCI's First Set of Interrogatories, Item No. 1.

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE:

            BellSouth objects to this Interrogatory on grounds that it is unduly
            burdensome, overly broad, and oppressive as written. Subject to this
            objection, and without waiving this objection, information responsive to
            this request is available via the following URL link:
            http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/
            The file name format is inter_attach_.04.

RESPONSE PROVIDED BY: Ray Lee

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, data concerning jumper activity on MDFs are maintained only on a rolling basis. No data is available for jumper activity on the IDF(s).

The information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's First Request for Production, Item No. 1 (Bates Range BST000001-BST000051) in AL Docket No. 29054.

RESPONSE PROVIDED BY: Dan Stinson

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, provisioning interval data in BellSouth's performance measurements systems are only calculated and retained consistent with the business rules and exclusions for each applicable measure under BellSouth's Service Quality Measurement plan. For example, the provisioning interval calculated consistent with the Order Completion Interval ("OCI") measure excludes provisioning intervals that are extended due to CLEC reasons. With this clarification, information responsive to this request is available via the following URL link:

http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
(Bates Range BST000052-BST000092)

RESPONSE PROVIDED BY: Dave Coon

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: For each CLLI code, and on a statewide basis in Kentucky, please provide
the number of UNE-P orders that were fulfilled each month since July 1,
2001 in Kentucky.

RESPONSE: Information responsive to this request is available via the following URL
link:

http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
(Bates Range BST000093-BST000119)

RESPONSE PROVIDED BY: Craig Williard

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: With regard to your response to MCI-5, please provide on a CLLI code-specific basis, the number of trouble reports within the first five days after the hot cut.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, information responsive to this request is available via the following URL link:

http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
(Bates Range BST000120-BST000125)

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: With regard to your response to MCI-5, 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 MCI-5.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
burdensome, overly broad, and oppressive as written. Subject to this
objection, and without waiving this objection, BellSouth does not maintain
records concerning the number of hot cuts performed within "the agreed-
upon time frame" such as a deadline set pursuant to an interconnection
agreement.   However, information relating to BellSouth's hot cut
performance is contained in two reports available via the following URL
link:

http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
        (Bates Range BST000126-BST000136)

The first report -- Customer Coordinated Conversion Interval Report --
measures the average length of time required to start and complete a hot
cut. The second report -- Hot Cut Timeliness Report -- measures the
percentage of timely hot cuts performed by BellSouth.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: With regard to your response to MCI-5, 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.).

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
burdensome, overly broad, and oppressive as written. Subject to this
objection, and without waiving this objection, loops generally would not
be re-used where existing service is provided by Integrated Digital Loop
Carrier ("IDLC") system. When re-use facilities are not available,
alternate facilities would be provided such as copper loop or universal
digital loop carrier ("UDLC"), if available. These facilities will possibly
require the due date to effectuate the migration but should not cause any
delay in the installation interval. If there are installation delays,
BellSouth's SEEMS plan will address that. Moreover, if the CLEC
correctly ports the telephone number, there should be no loss of telephone
number.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: With respect to the hot cuts identified in response to MCI-5, 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.

RESPONSE: BellSouth has a seamless hot cut process that ensures minimal end- user
service outage. BellSouth's process provides for the following: pre-wiring
and pre-testing of all wiring prior to the due date; verification of dial tone
from the CLEC's switch; verification of correct telephone number from
the CLEC switch using a capability referred to as Automatic Number
Announcement ("ANAC"); monitoring of the line prior to actual wire
transfer to ensure end-user service is not interrupted; and notification to
the CLEC that the transfer has completed. In addition to these activities
listed above, coordinated hot cuts (including coordinated / time specific
hot cuts) also include: notification to the CLEC of CLEC wiring errors,
dial tone or ANI problems; verification of end-user information with the
CLEC prior to the conversion; verification with the CLEC of cut date and
or time 24 – 48 hours prior to the conversion date; and joint acceptance
testing, if necessary, with the CLEC to ensure the transfer is successful
and number porting is complete.

The "costs" involved in performing hot cuts as calculated on a forward-
looking basis consistent with the FCC's pricing rules were provided in
connection with the UNE cost proceedings throughout the BellSouth
region. These calculations were included in the filings in those
proceedings, which are a matter of public record and are in the possession,
custody or control of MCI.

There is no "maximum" number of hot cuts that BellSouth has established
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.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: For each CLLI in Kentucky, provide the maximum number of hot cuts that
can be performed per day, week and month with current workforce levels
for (a) loops carrying voice only; and (b) loops carrying voice plus DSL.
State the basis for the maximum number (e.g., methods and procedures,
union work rules, informal guidelines, BellSouth policy, etc.).

RESPONSE: There is no set number of hot cuts for any loop that BellSouth has
established for a particular office in any state, including Kentucky.
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.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00379
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REQUEST: State and describe in detail any plans to increase workforce levels in the next 12 months for job classifications that perform hot cuts, state whether such plans have received budgetary approval and funding, and provide a copy of the approved and funded budget and related documentation.

RESPONSE: BellSouth has no current plans to increase workforce levels in the next 12 months because BellSouth is adequately staffed to handle the current volumes of hot cuts as evidenced by its performance data. Should BellSouth receive relief from providing unbundled circuit switching, BellSouth will address any necessary increases in force as appropriate. BellSouth's hot cut process is fully scalable and will meet any expected volumes.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please state whether you agree that a proper hot cut process requires BellSouth to re-use the existing loop for the following migration types: a) UNE-P to UNE DS-0/voice grade loops; b) line sharing over UNE-P when the DSL service is removed; c) line sharing over UNE-P migrated to line split UNE loop. If you agree, do you always perform hot cuts for the listed migration types in this manner? If not, why not? If you disagree, please state concisely your reasons for disagreement.

RESPONSE: a) See BellSouth's response to MCI's First Set of Interrogatories, Item No. 11. BellSouth agrees that a proper hot cut process requires that BellSouth make a timely efficient transition to a serving UNE-L facility and that such facility provide the proper characteristics of the type loop being requested consistent with TR76300, whether that facility is re-used or otherwise assigned for DSO/voice grade loops.

b) It is unclear to what hot cut process this Interrogatory is referring because because there is no clearly stated "from" and "to" in the migration scenario described in subpart (b). Also, there is no arrangement for "line sharing over UNE-P" because Line Sharing, by FCC definition, requires that the voice service be provided by the ILEC, not a CLEC using UNE-P. Additionally, there is no arrangement for line splitting over UNE-P. In order to use a UNE-P for Line Splitting, the UNE-P must be converted as the FCC clearly explained in its Texas 271 Order, ¶ 325, "For instance, if a competing carrier is providing voice service using the UNE-platform, it can order an unbundled xDSL-capable loop terminated to a collocated splitter and digital subscriber line access multiplexer ("DSLAM") equipment and unbundled switching combined with shared transport, *to replace its existing UNE-platform arrangement* with a configuration that allows provisioning of both data and voice services." (emphasis added). Accordingly, a UNE-P cannot be used for Line Splitting. The CLEC would need to have a UNE Loop, a UNE Port and cross connects, not a UNE-P.

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RESPONSE: (Cont.)

Subject to this clarification, it is assumed that MCI's request concerns "line splitting to UNE-L (when the xDSL service is removed)." In the context of "line splitting to UNE-L," should a CLEC request a hot cut, BellSouth is not "required" to use the existing loop unless the CLEC indicates on the service order for BellSouth to reuse the existing loop, and then only if the existing loop is capable of handling the new use and there are no other problems found with the existing loop. If the CLEC does not indicate on the service order to reuse the existing facilities, common practice would be to use the existing loop whenever possible, assuming that the existing loop is capable of handling the desired end migration (the "to" portion of this request). No date, no CLEC has requested a hot cut in connection with "line splitting to UNE-L."

c) See BellSouth's response to MCI's First Set of Interrogatories, Item 15(b)

RESPONSE PROVIDED BY: Ken Ainsworth
                         Tommy G. Williams

BellSouth Telecommunications, Inc.
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REQUEST: On a statewide basis and for each CLLI code, please identify all service
disruptions of the type referenced in paragraphs 421, 422 and 459 of the
Triennial Review Order that have occurred each month since July 1, 2001
during your hot cut process, and provide a detailed explanation of the
cause of the service disruption. As part of your response, please quantify
the subset of service disruptions where customers were unable to place or
receive calls and/or data for a period of greater than five minutes.

RESPONSE: The percentage of hot cuts (by state and by CLLI) where the service
disruption is five minutes or less is available via the following URL link:

http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
(Bates Range BST000137-BST000149)

During the normal hot cut process, a brief disruption of service is always
necessary in order to effectuate the migration. Furthermore, because
BellSouth is not required under its Service Quality Measurement Plans to
identify and capture the cause for service disruptions in connection with a
hot cut unless the service disruption is greater than 15 minutes per circuit,
no data is available for the cause of the disruptions lasting five minutes or
less as requested in this Interrogatory.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, BellSouth does not maintain data that reflects the number of orders cancelled prior to customer migration or the reason given by the CLEC for canceling such an order.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories, Item No. 10.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please provide the name(s) of the work group(s) whose members routinely
perform cross connects/jumper jobs in BellSouth central offices, and
provide the following information for each:

(a) a list and description of every job classification (e.g. frame technician)
within such work group(s);
(b) whether each job classification is staffed by members of a union, and
whether non-union employees may perform the same job function;
(c) for each job classification, the minimum job requirements, including
training, job experience, education, etc;
(d) a description of all on-the-job training required or provided for each
job classification once in the position;
(e) identify for disclosure all the methods and procedures or similar
documents that contain any kind of instructions specifying the steps,
processes, techniques, tasks, materials, etc. for performing cross
connects/jumper jobs, or identify all such documents for disclosure.

RESPONSE: The Network Operations, Central Office Field Work Group performs cross
connects/jumper jobs.

(a) Information responsive to this request is available at the following
URL link:

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

The responsive documents to this request are included in the file:

GA_17749-U_BST_SUPP_To_MCI_1_INTERPOD.pdf
(Bates Range BST000150-BST000155)

(b) Both COET and FA job titles are staffed by union and non-union
employees.

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RESPONSE: (Cont.)

    (c) Job requirements are available at the following website:

    http://www.bellsouth.com/employment/study_guides.htm#Management%20Tests

    (d) On-The –Job-Training consists of an experienced FA or ET observing the new hires performing necessary steps to complete each assigned task, which usually takes one to three weeks for the FAs and two to six weeks for the ETs.

    (e) The information responsive to this request consists of copyrighted material in various forms, including CD Rom and video. This information is proprietary and will be made available for inspection at a mutually convenient time subject to the protective agreement between the parties.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please 1) state whether BellSouth's methods, procedures, scheduling, and/or completion intervals are different in any way, 2) provide a detailed explanation of all such differences, and 3) identify for disclosure all Methods and Procedures and other documents that describe the work effort required for the following types of cross connects/jumper jobs:

(a) new retail service installation to a premises with no previous telephone service;
(b) adding a second line to a premises with existing service;
(c) performing a line and station transfer ("LST") that involves cross connects/jumper jobs at the MDF on a loop with live traffic;
(d) changing loops with live traffic from one type of retail service to another (e.g., POTS to ISDN);
(e) changing loops with live traffic from one type of provider to another (e.g., UNE-P to UNE loop; one CLEC UNE loop to another CLEC UNE loop)
(f) changing loops with live traffic from one service on a loop to two services on a loop (e.g., line shared DSL and voice; line split DSL and voice);
(g) any other type of cross connect/jumper job in the BellSouth central office not covered by (a) through (f) above.

RESPONSE: There are no basic differences in BellSouth's methods, procedures, scheduling, and/or completion intervals for the types of cross connects/jumper activity referenced in this Interrogatory. To the extent work steps may vary, these variations would be described in the materials BellSouth is making available for inspection in response to MCI's 1st Set of Interrogatories, Item No. 19.

RESPONSE PROVIDED BY: Dan Stinson

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: For each type of cross connect/jumper job identified in response to MCI-
20, please identify each step or task in the process (e.g., obtain work order
for frame wiring, review work order, travel to central office (if required),
travel to remote terminal/FDI/customer premises serving terminal (if
required), locate binder posts for service to be installed, locate binder
posts for service to be removed (if any), remove old jumper(s), install new
jumper(s), test for dial tone/connectivity, troubleshoot lack of dial
tone/connectivity, enter job completion in work force administration
system and/or other record(s), etc.)

RESPONSE: Work steps and tasks are detailed in the documents provided in described
in the materials BellSouth is making available for inspection in response
to MCI's 1st Set of Interrogatories, Item No. 19.

RESPONSE PROVIDED BY: Dan Stinson

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-20, 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-21, reported monthly for each month since July 1, 2001.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, BellSouth does not maintain data on work times associated with individual steps of a given cross connect activity nor does BellSouth maintain data on work times associated with different cross connect activities. However, records documenting the time it takes BellSouth employees to perform coordinated hot cuts is captured via the following three performance measurements in the Service Quality Measurement ("SQM") Plan: P-7, Coordinated Customer Conversions Interval; P-7A, Coordinated Customer Conversions - Hot Cut Timeliness % Within Interval and Average Interval; P-7C, Hot Cut Conversions - % Provisioning Troubles Within 7 Days of Completed Service Order.

RESPONSE PROVIDED BY: Dan Stinson
                          Bill Griffin

BellSouth Telecommunications, Inc.
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REQUEST: On a statewide basis and for each CLLI code, for each type of cross connect/jumper job identified in response to MCI-20, 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-21, 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, and oppressive as written. Subject to this objection, and without waiving this objection, see BellSouth's Supplemental Response to MCI's First Set of Interrogatories, Item No. 22. Work times are not specified in union contracts, methods and procedures, guidelines, rules, regulations, specifications, or Employee Evaluation Plans.

RESPONSE PROVIDED BY: Dan Stinson

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REQUEST: On a statewide basis and for each CLLI code, for each type of cross
             connect/jumper job identified in response to MCI-20, 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).

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
            burdensome, overly broad, and oppressive as written. Subject to this
            objection, and without waiving this objection, see BellSouth's
            Supplemental Response to MCI's First Set of Interrogatories, Item No. 23.

RESPONSE PROVIDED BY: Dan Stinson

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
burdensome, overly broad, and oppressive as written. Subject to this
objection, and without waiving this objection, priorities are determined by
due date requested and are established at the time of service order
issuance. Business lines carry a higher priority than do residential lines.
This prioritization process does not change during service disruptions.

RESPONSE PROVIDED BY: Dan Stinson

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REQUEST: Please provide all time and motion studies, special studies, or other
            evaluations of cross connect/jumper work times and processes.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
            burdensome, overly broad, and oppressive as written. Subject to this
            objection, and without waiving this objection, time and motion studies
            have not been performed on these work functions. Evaluations of cross
            connect/jumper work times have been conducted in connection with the
            UNE cost proceedings throughout the BellSouth region, and the results of
            such evaluations were included in the filings in those proceedings. These
            documents are a matter of public record and are in the possession, custody
            or control of MCI.

RESPONSE PROVIDED BY: Dan Stinson

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REQUEST: 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.

RESPONSE: BellSouth objects to this request for the reasons stated in General Objection No. 5 previously filed in this proceeding. Nevertheless and not withstanding this objection, BellSouth does not perform a specific nonrecurring cost study for the cost of placing a cross-connect/jumper. The cross-connect/jumper activity is a part of the provisioning process for the element(s) being connected.

The total work times for cross-connect/jumper activity are provided in file LA-2w.xls (see worksheet INPUTS_CONNECT&TEST, cells A43 to I45) of BellSouth's Revision 3 UNE Cost Studies (Caldwell Exhibit DDC-1) filed April 10, 2001 in LPSC Docket No. U-24714, Subdkt. A. For a 2-wire cross-connect associated with a SL1 loop, the work times are 15 minutes for the first install and 12 minutes for the first disconnect. Additional installs and disconnects each require a work times of 8 minutes. For a 2-wire cross-connect associated with an SL2 loop, the times are: 20 minutes install first; 15 minutes first disconnect; 10 minutes additional installation; and 7 minutes additional disconnect.

The loop nonrecurring rates reflect 85% of these work times. The remaining 15% are reflected in the collocation cross-connect nonrecurring rates.

Labor rates for the cost study in Docket No. U-24714 are furnished in the LABR0002.xls file provided on the CD for the April 10, 2001 filing (See directory titled Documentation\xappendix\Appendix E). For an explanation of the labor rate methodology, see Section 4, Labor Rates of the narrative contained on the same CD (See directory titled Documentation\1 Narratives and Study Descriptions).

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RESPONSE: (Continued)

The above cost studies contain proprietary information and are subject to provisions of the nondisclosure agreement executed by MCI/WorldCom.

RESPONSE PROVIDED BY: Reginald Starks
Director
675 West Peachtree Street
Atlanta, Kentucky 30375

Charles V. Lee
Director
3535 Colonnade Parkway
Birmingham, Alabama 35243

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
            burdensome, overly broad, and oppressive as written. Subject to this
            objection, and without waiving this objection, see below:

            a.   Central Offices are staffed according to work load demand, not
                    specific to cross connect/jumper jobs. Additional information
                    responsive to this request is available via the following URL link:
                    http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-03/
                    The file name format is GA_INTER_ATTACH_01.

            b.   Central Offices are staffed during normal business hours based on
                    work load demand and personnel availability.

            c.   BellSouth does maintain staffing data that is specifically associated
                    with cross connect/jumper activity.

            d.   BellSouth does not maintain staffing data that is specifically
                    associated with cross/connect jumper activity.

RESPONSE PROVIDED BY: Dan Stinson

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is unduly burdensome, overly broad, oppressive as written, and seeks information that is already a matter of public record or is otherwise publicly available.

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REQUEST: Please identify for disclosure all UNE performance measure or metric
reports applicable in Kentucky, including all reports 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is not
reasonably calculated to lead to the discovery of admissible evidence and
it is not relevant to the subject matter of this action. BellSouth also
objects to this Interrogatory on grounds that it is unduly burdensome,
overly broad, oppressive as written, and seeks information that is already a
matter of public record or is otherwise publicly available.

BellSouth Telecommunications, Inc.
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REQUEST: Please identify for disclosure all third party evaluations and/or reports
addressing and/or assessing BellSouth performance under the UNE
performance measures or metrics applicable in Kentucky.

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information
that is already a matter of public record or is otherwise publicly available.
Subject to this objection, and without waiving this objection, information
responsive to this request is contained in BearingPoint's Final Report,
dated June 6, 2003 at the Georgia Public Service Commission in Docket
No. 8354-U.

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REQUEST: Please list, define and describe each type of migration of service from one carrier to another in Kentucky for which you have current methods and procedures (e.g., hot cut, coordinated hot cut, bulk hot cut, frame due time, project managed cutover, loop conversion, line and station transfer, etc.), and identify for disclosure the business rules and methods and procedures for each such migration type.

RESPONSE: The following describes the types of migrations offered by BellSouth.

Coordinated/Time Specific hot cuts require BellSouth to convert the CLEC account at a time specified by the CLEC on the due date. When the CLEC elects this option, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due to verify that BellSouth's service order information agrees with the CLEC's request. BellSouth also confirms no jeopardy situation exists (for either the CLEC or for BellSouth), validates the specific conversion time requested, and provides to the CLEC the status of any dial tone test (that is, BellSouth's test of dial tone provided by the CLEC's switch). Coordination also requires CWINS to issue tickets to BellSouth's Network groups to coordinate the specific conversion time for BellSouth forces on the due date and the CLEC contact. CWINS will also contact the CLEC on the due date prior to the conversion time for a final validation that the migration is still a "go". The BellSouth CWINS technician communicates with the BellSouth's Network groups at the specified conversion time and makes the execution request to perform the hot cut. The CWINS technician stays on the call, awaiting Network completion notification. When the technician in BellSouth's Network group completes the hot cut, that technician notifies the CWINS technician who documents the hot cut completion. At this point, the hot cut is complete in BellSouth's network. The CWINS technician then attempts to notify the CLEC for acceptance of the order. Acceptance in this sense means that the CLEC agrees that the order has been fulfilled successfully and that is appropriate that BellSouth close the order as complete. Once CLEC acceptance is confirmed or default acceptance occurs the pending service orders are completed in BellSouth's systems by the CWINS technician. Default acceptance occurs when a CLEC does not reply to CWINS completion notification.

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RESPONSE: (Cont.)

Coordinated hot cuts require BellSouth to convert the CLEC's customer account at a time coordinated with CWINS and BellSouth's Network group on the due date. Coordination also requires BellSouth to contact the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (either for the CLEC or for BellSouth) and provides the CLEC the status of any dial tone test performed (that is, BellSouth's test of dial tone from the CLEC's switch). Coordination also requires the CWINS Center to issue tickets to BellSouth's Network groups to coordinate conversion activities and CWINS contact on the due date. CWINS will also contact the CLEC on the due date prior to the conversion time for a final validation that the migration is still a "go". The BellSouth CWINS technician communicates with the BellSouth's Network group prior to the conversion being started. Once all BellSouth personnel are in communication, the CWINS technician will make the execution request to perform the hot cut and stays on the call, awaiting Network completion notification. When the Network technician completes the hot cut, that technician notifies the CWINS technician who documents the completion. At this point, the hot cut is complete within BellSouth's network. The CWINS technician then attempts to notify the CLEC for acceptance. As discussed earlier, acceptance in this sense means that the CLEC agrees that the order has been fulfilled successfully and that is appropriate that BellSouth close the order as complete. Once CLEC acceptance is confirmed or default acceptance occurs, the pending service orders are completed by the CWINS technician.

Non-Coordinated hot cut requests are converted by BellSouth's Network personnel during normal business hours (8 a.m. to 5 p.m.) at various times on the due date based on the Network technicians' work load activity and schedule. Once the non-coordinated hot cut is completed by Network personnel, the technician completes the work order which generates a notification (either by facsimile or by e-mail) to the CLEC that the conversion is complete.

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RESPONSE: (Cont.)

The service order processing methods available from BellSouth for service migration include: (1) an individual account migration service request, which applies to both residence and business service lines and may include single or multiple lines on one account; (2) project hot cuts service requests, which are for 15 or more non-complex residence and business services for a single account at a specific end-user location and which provide special handling with the inclusion of project management to assure additional coordination due to volumes; and (3) BellSouth's batch hot cut process for UNE-P to UNE-L.

Additional information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth, pursuant to the protective agreement, in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q:

1. Checklist for UNEC Provisioning
2. CLEC to CLEC (C2C) Conversion Process
3. Network SSI&M / I&M, Methods and Procedures For Provisioning Unbundled Network Elements - Unbundled Voice Loops
4. LNP - REQTYP B & Non-Complex and Complex REQTYP C General Ordering / Process Guidelines
5. LNP-UNE to UNE Bulk Migration (UNE P to UNE L) [Mechanized Procedures]
6. Enhanced Delivery Initiative Process for SL1 Group
7. Screening Work Process for Designed and Non Designed Provisioning
8. Unbundled Non-Designed (SL1) Voice Grade Loops - SL1 Wiring and Testing Work Steps
9. Unbundled Designed (SL2) Voice Grade Loops - SL2 Voice Grade Wiring and Testing Work Steps
10. Turn Up – Designed Inside Cut Only, Conversions
11. Turn Up – Designed Outside Cut Only, Coordinated Conversions
12. Turn Up – Non-Designed Inside-Cut-Only Coordinated Conversion
13. Turn-Up – Designed Combined Inside and Outside Coordinated Conversions

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14. Turn-Up – Non-Designed Outside Cut Only Coordinated Conversions
15. Turn-Up – Non-Designed Combined Inside and Outside Coordinated Conversions
16. Unbundled Local Loops (ULL)
17. UVL Job Aid
18. *BellSouth Business Rules for Local Ordering Handbook (BellSouth Business Rules"*, Release 15.0
http://www.interconnection.bellsouth.com/guides/html/leo.html

RESPONSE PROVIDED BY: Ken Ainsworth

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REQUEST: For each type of service migration in Kentucky listed in your response to
Request MCI-100, please:

(a)provide the current total non-recurring charge(s);
(b)separately state the service ordering charge(s), the provisioning (cross
connect/jumper job) charge(s), and any other charge(s);
(c) list and describe any current volume discounts applicable to non-
recurring charges;
(d) list any changes in non-recurring charges and/or volume discounts
planned or expected in the next 12 months.

RESPONSE:

(a) Charges vary and can be found either in the individual CLEC's
Interconnection Agreement or the BellSouth standard Interconnection
Agreement, which are a matter of public record or are otherwise
publicly available.

(b) Charges vary and can be found either in the individual CLEC's
Interconnection Agreement or the BellSouth standard Interconnection
Agreement, which are a matter of public record or are otherwise
publicly available. Charges include the CLEC to CLEC conversion
rate element, Order Coordination/Hot Cut (chargeable option for
UVL-SL1, UCL-ND and UCL-Designed), SOMAN, Collocation
cross-connects.

(c) None.

(d) BellSouth is unaware of any planned or expected changes in
nonrecurring charges currently contained in individual CLEC
Interconnection Agreement or the BellSouth standard Interconnection
Agreement.

RESPONSE PROVIDED BY: Karen Fields

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REQUEST: Please state the number of loops that you believe is appropriate to include in a single "batch," as the FCC uses that terminology and concept in ¶ 489 of the *Triennial Review Order,* and provide the basis for your belief and identify for disclosure all documentation that supports your belief.

RESPONSE: BellSouth's "batch" hot cut process allows from 2 to 99 accounts with up to 25 lines each to be migrated on a single "batch" request. The CLEC would determine the appropriate number of loops to be submitted subject to the criteria stated above.   In addition, CLECs may submit multiple batch migrations.

RESPONSE PROVIDED: Ken Ainsworth

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Pre-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 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent it is overly broad and unduly burdensome. Subject to this objection, and without waiving this objection, BellSouth provides the following response:

This Interrogatory contains the term "flow-through process." The FCC, in the Second Kentucky Order ¶ 107, stated, "[a] competing carrier's orders 'flow through' if they are transmitted electronically through the gateway and accepted into BellSouth's back office order systems without manual intervention." Therefore, BellSouth defines flow-through as the activity that occurs when a CLEC takes information directly from an end user customer, inputs it directly into an electronic ordering interface without making any changes or manipulating the customer's information, and sends the complete and correct request downstream for mechanized service order generation. Thus, "flow-through processes" apply to BellSouth's electronic ordering interface applications only.

With this definition in mind, BellSouth assumes that this interrogatory is requesting pre-ordering information provided by BellSouth that can be obtained electronically.

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RESPONSE: (Cont.)

The pre-ordering information provided by BellSouth consists of obtaining access to the following information and functions that a CLEC will need while negotiating an order with an end-user customer, including:

- street address validation;
- telephone number selection;
- availability of services and features;
- due date information;
- customer service record information; and
- loop makeup information.

This is the same information regardless of whether the UNE loops are provisioned on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC.

The preorder functionally offered by BellSouth is described in detail in the following BellSouth documents, posted to the Interconnection website:

BellSouth Local Ordering Handbook, Section 2, *Pre-Ordering (*TCIF9 / LSOG4, Release 13.0/ Version 13.0C)
http://interconnection.bellsouth.com/guides/leo/bbrlo_releases/13_0/pdf/130-2.pdf

BellSouth Pre-Ordering and Ordering Overview Guide
http://www.interconnection.bellsouth.com/guides/bpobr/pdf/bst_pr_1.pdf

Local Exchange Navigation System (LENS) User Guide
LENS Version 6.0 Training (Windows 95/98 2000 Platform)
LENS Version 6.0 Training (Windows NT 4.0 Platform)
http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

TAG User Guide (requires login/password for valid TAG user)
www.interconnection.bellsouth.com/oss/tag/tag_info.html

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RESPONSE: (Cont.)

BellSouth EDI Specifications Guide for TCIF Issue 9 Pre-Order and Firm Order Query/Response
BellSouth EDI Specifications Guide for ELMS6 Pre-Order and Firm Order Query/Response
BellSouth IA EDI Implementation Guide
Pre-Order to Firm-Order Mapping Matrix (HTML Version)
CSR Job Aid (HTML Version)
http://www.interconnection.bellsouth.com/guides/html/bpobr.html

D/CLEC Pre-Ordering and Ordering Guide for Electronic Loop Makeup (LMU)
http://www.interconnection.bellsouth.com/guides/bpobr/pdf/dclecord.pdf

DLEC/CLEC Job Aid Loop Qualification System (LQS)
http://www.interconnection.bellsouth.com/guides/bpobr/pdf/lqs.pdf

BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guides for Manual Loop Makeup
http://www.interconnection.bellsouth.com/guides/bpobr/docs/lmupo.doc

Also reference the individual CLEC Information Packages for specific services including but not limited to the BellSouth Unbundled Voice Loop - SL1 (Non-Designed) CLEC Information Package and the BellSouth Unbundled Voice Loop-SL2 CLEC Information Package Version 2, found at the Interconnection website at
http://interconnection.bellsouth.com/guides/html/unes.html

ICE Carrier Notification Letter
http://www.interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91083411.pdf

ICE User Guide (online access requires login/password for valid ICE User)
https://ice.bellsouth.com/ICE_LOGON.ASP

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RESPONSE: (Cont.)

Additional information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth, pursuant to the protective agreement, in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q:

- ICE Overview dated July 2003
- ICE Work Around Processing of LSRs
- ICE User Guide Version 1.1
- ICE Web Site Application Map & Web Page Descriptors

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad and unduly burdensome. Subject to this objection, and without waiving this objection, BellSouth provides the following response:

This Interrogatory contains the term "flow-through process." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI First Set of Interrogatories, Item No. 36. This response is provided in that context.

BellSouth provides three electronic ordering applications: EDI, TAG, and LENS. EDI follows the industry protocol (EDI) for ordering and the Ordering and Billing Forum ("OBF") guidelines for LSRs. The TAG and LENS interfaces also follow the same OBF guidelines for LSRs.

The ordering process is the same regardless of whether the UNE loops are provisioned on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC.

The Flow-Through Matrix, already in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q:
and which is also available at the Performance Measurement and Analysis Platform ("PMAP") website at http://pmap.bellsouth.com/content/documentation.aspx, provides detailed information about the services and UNEs that can be ordered and which interfaces may be used, and includes whether the process is currently fully electronic (i.e., flows through), partially electronic, or manual.

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RESPONSE: (Cont.)

The ordering functionally offered by BellSouth is described in detail in the following BellSouth documents, posted to the Interconnection website:

LOH - Local Ordering Handbook (formerly named the "BellSouth Business Rules for Local Ordering TCIF 9/LSOG 4")
http://interconnection.bellsouth.com/guides/html/leo.html

Local Exchange Ordering (LEO) Implementation Guide - Volume 1
http://interconnection.bellsouth.com/guides/html/leo.html

BellSouth Local Ordering Handbook (Section 3 – Ordering, TCIF9 / LSOG 4, Release 13.0/ Version 13.0C)
http://interconnection.bellsouth.com/guides/leo/bbrlo_releases/13_0/pdf/130-3.pdf

BellSouth Pre-Ordering and Ordering Overview Guide
http://www.interconnection.bellsouth.com/guides/bpobr/pdf/bst_pr_1.pdf

Local Online Ordering Tutorial
http://interconnection.bellsouth.com/guides/tutorials/local_tutorial/pages/index.htm

Local Exchange Navigation System (LENS) User Guide
LENS Version 6.0 Training (Windows 95/98 2000 Platform)
LENS Version 6.0 Training (Windows NT 4.0 Platform)
http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

TAG User Guide (requires login/password for valid TAG user)
www.interconnection.bellsouth.com/oss/tag/tag_info.html

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RESPONSE: (Cont.)

BellSouth EDI Specifications Guide for TCIF Issue 9 Pre-Order and Firm Order Query/Response
BellSouth EDI Specifications Guide for ELMS6 Pre-Order and Firm Order Query/Response
BellSouth IA EDI Implementation Guide
Pre-Order to Firm-Order Mapping Matrix (HTML Version)
CSR Job Aid (HTML Version)
http://www.interconnection.bellsouth.com/guides/html/bpobr.html

Issue Resolution Guide for Local Customers
http://interconnection.bellsouth.com/guides/issue_resolutions/local_issue_guide/tableOfContents.html

UNE to UNE Bulk Ordering Specifications for EDI TCIF Issue 9 Trading Partners
http://interconnection.bellsouth.com/guides/leo/pdf/tcif9_bulkspec.pdf

UNE to UNE Bulk Ordering Specifications for EDI ELMS6 Trading Partners
http://interconnection.bellsouth.com/guides/leo/pdf/elms_6_bulkspec.pdf

Also reference the individual CLEC Information Packages for specific services including but not limited to the BellSouth Unbundled Voice Loop - SL1 (Non-Designed) CLEC Information Package and the BellSouth Unbundled Voice Loop-SL2 CLEC Information Package Version 2, found at the Interconnection website at
http://interconnection.bellsouth.com/guides/html/unes.html

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Provisioning</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.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as explained in BellSouth's response to MCI First Set of
Interrogatories, Item No. 36. Consequently, there is no "automated, flow-
through processes" for provisioning of DS-0/voice grade UNE loops of
any service type.

RESPONSE PROVIDED BY: Ken Ainsworth

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Maintenance/Repair</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.

RESPONSE: This interrogatory contains the term "flow-through process." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI's First Set of Interrogatorries, Item No. 36. Consequently, BellSouth assumes that this interrogatory is requesting information related to trouble reporting and tracking functions for maintenance and repair that are provided by BellSouth and that can be obtained electronically. This response is provided in that context.

BellSouth provides CLECs with nondiscriminatory access to its Operations Support Systems ("OSS") and the necessary information contained therein so that the CLEC user can execute the following functions with the same precision that a BellSouth user could for an equivalent Retail customer:

1. Enter a trouble report on a product/service provided by BellSouth,
2. Modify an existing trouble report,
3. Obtain the current status of an existing trouble report, and
4. Close an existing trouble report.

All of the products and services provided by BellSouth fall into one of two categories:

1. "Designed Services" (e.g., SL2 UNE Loop, DS0, etc.) supported by BellSouth's Work Force Administration (WFA) OSS, or

2. "Non-Designed Services" (e.g., SL1 UNE Loops, POTS, UNE-P, etc.) supported by BellSouth's Loop Maintenance Operations System (LMOS).

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The Work and Force Administration (WFA) system product line manages and automates most of the work assignments required to install and repair client company facilities, such as message, trunks, special service circuits, carrier services, and business/residential lines.

The WFA product line includes the following systems:

- WFA/C system, the work assignment and control administration component of the WFA product line. Telcordia ™ Work and Force Administration/Internet Extension (WFA/IX) is a subsystem of WFA/C that supports the Trouble Management Process across multiple application instances.
- The Telcordia ™ Work and Force Administration/Dispatch In (WFA/DI) system, the force administration component that manages central office craft personnel.
- The Telcordia ™ Work and Force Administration/Dispatch Out (WFA/DO) system, the force administration component that manages outside technicians.
  NOTE: Information sent to the WFA/DO and WFA/DI dispatch systems is also sent to Telcordia™ Force, an automated dispatch system for inside and outside technicians.
- The Telcordia ™ Network and Services Database (NSDB), which stores data received from the TIRKS system and Service Order Analysis and Control (SOAC) system, distributes data to operations systems such as WFA/C and Service Delivery, and receives completions and updates from WFA/C and Service Delivery.

The LMOS family of systems provides POTS service activation and assurance. LMOS is an AT&T/Lucent developed system composed of the following major subsystems:
- LMOS Host runs on 5 IBM mainframes. Its key functions are to store and maintain detailed customer line record information, and create and maintain historical data on closed trouble reports and service orders. The Host interfaces with over 45+ applications.
- LMOS FE, another Lucent system, runs on 13 NCR mid-range platforms, and performs ticket management from entry to close-out. LMOS FE interfaces with 32 applications.

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- LMOS Mapper, part of the Front End, assembles dispatchable orders requiring field work
- The Access Network System (ANS) ensures secure access to LMOS and runs on 11 HP mid-range platforms.
- The ARSB Datakit Network which provides data communication for LMOS.
- LEACS mechanically corrects more than 50% of the LMOS Database generated errors via terminal emulation. LMOS provides an interface to the Mechanized Loop Test (MLT) system for automated testing and analysis of telephone lines and equipment.

CLECs have access to the following interfaces that provide nondiscriminatory access to BellSouth's maintenance and repair OSS:

Electronic Communications Trouble Administration (ECTA)
ECTA is an Open System Interconnection (OSI) Network Management compliant platform providing Common Management Information Protocol (CMIP) services for supported applications. This "machine-to-machine" interface is built to the American National Standards Institute (ANSI) standards for the exchange of telecommunications trouble administration information as defined by the Electronic Communications Implementation Committee (ECIC) of the Alliance for Telecommunications Industry Solutions (ATIS). Specifically, these standards include T1.227-1995, T1.227A-1998, T1.228-1995 and T1.262-1998[2].

ECTA supports trouble reports for both Designed and Non-Designed services. In addition, ECTA allows the CLEC to obtain Mechanized Loop Test (MLT) results without submitting a trouble report.

ECTA is described in detail in the following BellSouth documents posted to the Interconnection website at:

Start-Up Guide:
http://www.interconnection.bellsouth.com/guides/activation/pdf/ecta_guide_a.pdf

Joint Implementation Agreement (Sample JIA):
http://www.interconnection.bellsouth.com/guides/activation/pdf/clec_jia.pdf

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<u>Circuit Provisioning Status System – Trouble Administration (CPSS-TA)</u>
CPSS-TA is a "man-to-machine" Graphical User Interface (GUI)
accessible via the public Internet, which supports trouble reports on
Designed services.

CPSS-TA is described in detail in the following BellSouth document
posted to the Interconnection website at:
http://www.interconnection.bellsouth.com/guides/statusing/pdf/eccpss.pdf

<u>CLEC Trouble Administration Facilitation Interface (TAFI)</u>
TAFI is a "man-to-machine" character based interface accessible via
either a Local Area Network (LAN) connection or modem pool, which
supports processing trouble reports on Non-Designed services.

TAFI is used by BellSouth's retail repair centers to process trouble reports
for its customers. While there is only <u>one</u> set of TAFI code, the CLEC
"version" of TAFI insures that the CLEC user can: (1) only access data for
one of his customers and (2) can process trouble reports for both
Residence and Business class of service customers on the same processor.

In addition to the functions listed above, TAFI attempts to resolve the
customer's trouble condition on the initial customer contact. If TAFI
cannot resolve the problem, it routes the report to the correct BellSouth
resource for resolution.

TAFI is described in detail in the following BellSouth document posted to
the Interconnection website at:
http://www.interconnection.bellsouth.com/guides/lens_tafi/pdf/tafi_is5.pdf

Other documentation that describes Maintenance/Repair processes for
UNE loops capable of supporting DS-0/voice-grade UNE loops include
the following:

The BellSouth Operational Understanding Guide establishes a foundation
for a working relationship between the CLEC Maintenance Service Center
and BST in support of Local Services. This document seeks to establish
the roles and responsibilities for each work center, define the operational

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requirements needed to perform the assigned responsibilities, and to ensure and facilitate a mutual understanding for the interactive support of Local Services during its implementation and production phases. This document is posted to the Interconnection website at: http://www.interconnection.bellsouth.com/guides/other_guides/html/gopeu001/index.htm

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Billing</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.

RESPONSE: This Interrogatory contains the term "flow-through process." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI's First Set of Interrogatorries, Item No. 36. Consequently, BellSouth assumes that this interrogatory is requesting information related to billing functions provided by BellSouth that can be obtained electronically. This response is provided in that context.

Non-design DS0/voice grade UNE loops are billed by Integrated Billing Solution (IBS). Service order processing is generally the same for all services billed by IBS. Orders for services billed by IBS are initially received into Customer Records Information System (CRIS) from the ordering system. The information is then programmatically audited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and service orders are sent back to CRIS for processing. Once the service orders have passed the various CRIS audits, the information is posted to the Customer Service Record (CSR) in CRIS with the exception of the appearance of recurring rates. Service order information is then sent from CRIS to IBS for rating and taxing purposes. Services ordered by customers are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which types of service are included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process within the Tapestry component of IBS matches the USOCs in the service orders with the rates in the rating tables and determines how much should be charged to the customers. The rated

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RESPONSE: (Cont.)

service order information is updated to the customer's account records to await the end of the customer's billing period and inclusion on the customer's invoice.

Billing system processing for design DS0/voice grade UNE loops is very similar to the processing mentioned above for non-design loops. However, design loops are billed by Carrier Access Billing System (CABS) and are not processed by CRIS or IBS. Service order processing is generally the same for all services billed by CABS. After service orders for design loops are received into CABS from the ordering system, the information is audited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and service orders are sent back to CABS for processing. Once the service orders have passed the various audits, the rating process begins. Services being ordered by a customer are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which type of service is included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process in CABS matches the USOCs in the service orders with the rates in the rating tables and determines how much should be charged to the customers. The rated service order information is updated to the customer's account records in CABS to await the end of the customer's billing period and inclusion on the customer's invoice.

RESPONSE PROVIDED BY: Clyde Greene

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Pre-ordering</u> for <u>DSL-
capable</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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories, Item No. 36.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Ordering</u> for <u>DSL-capable</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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories, Item No. 37. In addition to the ordering applications described in that response, BellSouth also offers the Interconnection CLEC Enabler (ICE) web-based application that allows CLECs and BellSouth Engineering offices to handle xDSL service inquiries (with firm order). The CLEC area of the application provides the functionality to enable the CLEC to perform the following tasks:

- Create a new XDSL Service Inquiry (with firm order)
- Cancel an existing, active XDSL Service Inquiry
- View the details of any existing XDSL Service Inquiry
- Respond to Service Inquiry Clarification requests.

The ordering process is the same regardless of whether the UNE loops are provisioned on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. It should be noted, however, that DSL-capable UNE loops typically require a loop facility consisting of only non-loaded metallic facilities. This is because some technologies, such as High Bit-rate Digital Subscriber Line (HDSL), cannot be transported via DLC due to the bandwidth employed.

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RESPONSE: (Cont.)

When a customer is served by DLC, an Unbundled Local Loop providing such a wide bandwidth will not typically be available. This can be provided at either the loop level, as in a) all-copper facilities, but would only be provided at the sub-loop level, as in b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC. Refer to the Unbundled Local Loop - Technical Specifications TR73600 document located on the Interconnection website at http://www.interconnection.bellsouth.com/guides/html/tech_ref.html for the technical specifications for the Unbundled Local Loops offered by BellSouth, including DSL-capable loops.

Also reference the individual CLEC Information Packages for specific services including but not limited to the BellSouth Unbundled Copper Loop Non-Designed (UCL-ND), the BellSouth Unbundled ADSL/HDSL Compatible Loops (Revised CLEC Information Package), and the BellSouth Unbundled Copper Loop Designed (Revised CLEC Information Package) found at the Interconnection website at http://interconnection.bellsouth.com/guides/html/unes.html

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities
            to support automated, flow-through processes for <u>Provisioning</u> for <u>DSL-
            capable</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.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-
            through processes apply to BellSouth's electronic ordering interface
            applications only, as explained in BellSouth's response to MCI First Set of
            Interrogatories, Item No. 36. Consequently, there is no "automated, flow-
            through processes" for provisioning of DSL-capable loops of any service
            type.

RESPONSE PROVIDED BY: Ken Ainsworth

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Maintenance/Repair</u> for <u>DSL-capable</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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 39.

The ability for a CLEC to enter a trouble report is the same regardless of whether the UNE loops are provisioned on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper facilities using UDLC or NGDLC. It should be noted, however, that DSL-capable UNE loops typically require a loop facility consisting of only non-loaded metallic facilities. This is because some technologies, such as High Bit-rate Digital Subscriber Line (HDSL), cannot be transported via DLC due to the bandwidth employed. When a customer is served by DLC, an Unbundled Local Loop providing such a wide bandwidth will not typically be available. This can be provided at either the loop level, as in a) all-copper facilities, but would only be provided at the sub-loop level, as in b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper facilities using UDLC or NGDLC.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Billing</u> for <u>DSL-capable</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.

RESPONSE: This Interrogatory contains the term "flow-through process." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI's First Set of Interrogatorries, Item No. 36. Consequently, BellSouth assumes that this interrogatory is requesting information related to billing functions provided by BellSouth that can be obtained electronically. This response is provided in that context.

Non-design DSL-capable UNE loops are billed by Integrated Billing Solution (IBS). Service order processing is generally the same for all services billed by IBS. Orders for services billed by IBS are initially received into Customer Records Information System (CRIS) from the ordering system. The information is then programmatically audited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and service orders are sent back to CRIS for processing. Once the service orders have passed the various CRIS audits, the information is posted to the Customer Service Record (CSR) in CRIS with the exception of the appearance of recurring rates. Service order information is then sent from CRIS to IBS for rating and taxing purposes. Services ordered by customers are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which types of service are included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process within the Tapestry component of IBS matches the USOCs in the service orders with the rates in the rating tables and determines how much should be charged to the customers. The rated service order information is updated to the customer's account records to

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RESPONSE: (Cont.)

await the end of the customer's billing period and inclusion on the customer's invoice.

Billing system processing for design DSL-capable UNE loops is very similar to the processing mentioned above for non-design loops, however, design loops are billed by Carrier Access Billing System (CABS) and are not processed by CRIS or IBS. Service order processing is generally the same for all services billed by CABS. After service orders for design loops are received into CABS from the ordering system, the information is audited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and service orders are sent back to CABS for processing. Once the service orders have passed the various audits, the rating process begins. Services being ordered by a customer are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which type of service is included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process in CABS matches the USOCs in the service orders with the rates in the rating tables and determines how much should be charged to the customers. The rated service order information is updated to the customer's account records in CABS to await the end of the customer's billing period and inclusion on the customer's invoice.

RESPONSE PROVIDED BY: Clyde Greene

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Pre-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 for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 36. In addition to these pre-ordering functions, an additional loop makeup/loop qualification pre-order function unique to shared loop products (including line splitting) is the "conditional qualification" process. This process provides additional options when performing a pre-qualification assessment and allows "conditional qualification" of a loop with a copper Digital Added Main Line ("DAML"). This process is described in detail in each of the CLEC information packages for the various line splitting products on the Interconnection website at: http://interconnection.bellsouth.com/guides/html/unes.html.

The pre-ordering information provided by BellSouth is the same information regardless of whether the UNE loops are provisioned on a) all-copper facilities; b) hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper facilities using UDLC or NGDLC. It should be noted, however, that UNE loops capable of supporting line splitting require a loop facility consisting of only non-loaded metallic facilities. This is described in the CLEC information packages for the various line splitting products on the Interconnection website at http://interconnection.bellsouth.com/guides/html/unes.html. Line splitting UNEs may be provided at either the loop level (CO-based line splitting), when served by a) all-copper facilities, but would only be provided at the sub-loop level (Remote Site Line Splitting), when served by b) hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper facilities using UDLC or NGDLC.

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The pre-order functionally offered by BellSouth, as it relates to Line Splitting, is additionally described in detail in the following BellSouth documents, posted to the Interconnection website:

Line Splitting (Central Office Based) CLEC Information Package
http://interconnection.bellsouth.com/guides/html/unes.html

Letter of Authorization for Line Splitting CLEC Information Package
http://interconnection.bellsouth.com/guides/unedocs/loa.pdf

Remote Site Line Splitting CLEC Information Package
http://interconnection.bellsouth.com/guides/unedocs/rs_linesplit.pdf

BellSouth Line Splitting Service
http://interconnection.bellsouth.com/guides/unedocs/line_split_ser_desc.pdf

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</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 for
disclosure all documents describing these processes, including but not
limited to Telcordia documents, BellSouth Methods and Procedures,
Workgroup User Manuals, Guidelines, Bulletins, etc.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories, Item No. 37.
The ordering processes provided by BellSouth for line splitting are the
same regardless of whether the UNE loops are provisioned on a) all-
copper facilities; b) hybrid fiber-copper facilities using IDLC or c) hybrid
fiber-copper facilities using UDLC or NGDLC. It should be noted,
however, that UNE loops capable of supporting line splitting require a
loop facility consisting of only non-loaded metallic facilities. This is
described in the CLEC information packages for the various line splitting
products listed below. Line splitting UNEs may be provided at either the
loop level (CO-based line splitting), when served by a) all-copper
facilities, but would only be provided at the sub-loop level (Remote Site
Line Splitting), when served by b) hybrid fiber-copper facilities using
IDLC or c) hybrid fiber-copper facilities using UDLC or NGDLC.

Prior to placing an order for UNE loops for Line Splitting, whether CO-
based or remote site, DLEC/CLEC owned or BellSouth provided splitters
and all equipment necessary for Line Splitting must be in place. This is
accomplished by manually submitting the LSOD [Line Splitter Ordering
Document] to the CRSG to order BellSouth provided splitters and CLEC
cable pair activation.

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RESPONSE: (Cont.)

Currently, only CO-based Line Splitting (UNE-P voice) with DLEC-owned splitter can be ordered electronically with flow-through.

Specific ordering information relative to Line Splitting may be obtained from the following BellSouth documents, posted to the Interconnection website:

Line Splitting (Central Office Based) CLEC Information Package
http://interconnection.bellsouth.com/guides/html/unes.html

Letter of Authorization for Line Splitting CLEC Information Package
http://interconnection.bellsouth.com/guides/unedocs/loa.pdf

Remote Site Line Splitting CLEC Information Package
http://interconnection.bellsouth.com/guides/unedocs/rs_linesplit.pdf

BellSouth Line Splitting Service
http://interconnection.bellsouth.com/guides/unedocs/line_split_ser_desc.pdf

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Provisioning</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 for
disclosure all documents describing these processes, including but not
limited to Telcordia documents, BellSouth Methods and Procedures,
Workgroup User Manuals, Guidelines, Bulletins, etc.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as explained in BellSouth's response to MCI First Set of
Interrogatories, Item No. 36. Consequently, there is no "automated, flow-
through processes" for provisioning of UNE loops of any service type.

RESPONSE PROVIDED BY: Tommy G. Williams

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities
            to support automated, flow-through processes for <u>Maintenance/Repair</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 for
            disclosure all documents describing these processes, including but not
            limited to Telcordia documents, BellSouth Methods and Procedures,
            Workgroup User Manuals, Guidelines, Bulletins, etc.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 39.
            The ability for a CLEC to enter a trouble report is the same regardless of
            whether the UNE loops are provisioned on a) all-copper facilities; b)
            hybrid fiber-copper facilities using IDLC and c) hybrid fiber-copper
            facilities using UDLC or NGDLC. However, it should be noted that line
            splitting provides a service where voice and data operate on the same loop,
            and an unloaded, 2-wire copper loop must serve the end user. Therefore,
            the OSS capabilities described below apply to all-copper facilities (either
            CO-based or Remote Site-based) only. This can be provided at either the
            loop level, as in a) all-copper facilities, but would only be provided at the
            sub-loop level, as in b) hybrid fiber-copper facilities using IDLC and c)
            hybrid fiber-copper facilities using UDLC or NGDLC.

            CLECs have access to the following interfaces that provide
            nondiscriminatory access to BellSouth's maintenance and repair OSS
            which support Line Splitting:

            Trouble Administration Facilitation Interface (TAFI)
            TAFI is a "man-to-machine" character-based interface accessible via
            either a Local Area Network (LAN) connection or modem pool, which
            supports processing trouble reports on Non-Designed (POTS) voice-grade
            services.

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RESPONSE: (Cont.)

TAFI is used by BellSouth's retail repair centers to process trouble reports for its customers. While there is only <u>one</u> set of TAFI code, the CLEC "version" of TAFI insures that the CLEC user can: (1) only access data for one of his customers and (2) can process trouble reports for both Residence and Business class of service customers on the same processor.

In addition to the functions listed above, CLEC TAFI attempts to resolve the customer's trouble condition on the initial customer contact. If CLEC TAFI cannot resolve the problem, it routes the report to the correct BellSouth resource for resolution.

DLEC TAFI for Line Splitting is completely different from regular CLEC TAFI. Since the DLEC is providing high-speed data access over the same physical facilities via the Line Splitting methodology, the DLEC will be limited in TAFI to only processing Line Splitting and Line Share Data (LSD) reports. A separate password and DLEC TAFI account are required.

DLECs provide high-speed data over the same physical facilities as the POTS service to the end-user via the Line Splitting and/or Line Sharing methodologies. TAFI also provides DLECs with sufficient functionality to submit trouble reports on the services they provide. Specific DLEC functions include the ability to:
- Submit a trouble report
- Access trouble history on the end user's account
- Request a vendor meet
- Run a baseline MLT (Mechanized Loop Test)
- View a splitter signature on the loop

TAFI is described in detail in the following BellSouth document posted to the Interconnection website at:
http://www.interconnection.bellsouth.com/guides/lens_tafi/pdf/tafi_is5.pdf

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RESPONSE: (Cont.)

Other documentation that describes Maintenance/Repair processes for
UNE loops capable of supporting line splitting include the following:

BellSouth Line Sharing Collaboratives
Maintenance and Trouble Receipt Flows and the Line Splitting
Maintenance Flow are available on the Collaborative website at:
http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab
/index.html

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>current</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Billing</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 for disclosure all documents describing these processes, including but not limited to Telcordia documents, BellSouth Methods and Procedures, Workgroup User Manuals, Guidelines, Bulletins, etc.

RESPONSE: This Interrogatory contains the term "flow-through process." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI's First Set of Interrogatorries, Item No. 36. Consequently, BellSouth assumes that this interrogatory is requesting information related to billing functions provided by BellSouth that can be obtained electronically. This response is provided in that context.

UNE loops capable of supporting line splitting are billed by Integrated Billing Solution (IBS). Service order processing is generally the same for all services billed by IBS. Orders for services billed by IBS are initially received into Customer Records Information System (CRIS) from the ordering system. The information is then programmatically audited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and service orders are sent back to CRIS for processing. Once the service orders have passed the various CRIS audits, the information is posted to the Customer Service Record (CSR) in CRIS with the exception of the appearance of recurring rates. Service order information is then sent from CRIS to IBS for rating and taxing purposes. Services ordered by customers are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which types of service are included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process within the Tapestry component of IBS matches the

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USOCs in the service orders with the rates in the rating tables and determines how much should be charged to the customers. The rated service order information is updated to the customer's account records to await the end of the customer's billing period and inclusion on the customer's invoice.

RESPONSE PROVIDED BY: Clyde Greene

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REQUEST: To the extent that BellSouth's responses to MCI-36 to MCI-50 assert that
            BellSouth has in place OSS capabilities to support automated, flow-
            through processes, please provide for each response to Data Request
            MCI-36 to MCI-50, the statewide volumes that have been supported on an
            automated flow-through basis for each month since July 1, 2001.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
            possession, custody, or control as it was provided by BellSouth, pursuant
            to the protective agreement, in response to MCI's 1st Request for
            Production, No. 1, in NCUC Docket No. P-100, Sub 133q:

RESPONSE PROVIDED BY: Al Varner

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REQUEST: To the extent that BellSouth's responses to MCI-36 to MCI-50
            assert that BellSouth has in place OSS capabilities to support automated,
            flow-through processes, please provide for each Data Request MCI-36 to
            MCI-50 the monthly fall-out rates (*i.e.*, percentage of transactions that
            were designed to flow through but did not) since July 1, 2001.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
            possession, custody, or control as it was provided by BellSouth, pursuant
            to the protective agreement, in response to MCI's 1st Request for
            Production, No. 1, in NCUC Docket No. P-100, Sub 133q:

RESPONSE PROVIDED BY: Al Varner

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REQUEST: To the extent that BellSouth's responses to MCI-103 to MCI-117 assert
that BellSouth has in place OSS capabilities to support automated, flow-
through processes, please provide for each response to Data Request MCI-
103 to MCI-117 the maximum daily, weekly and monthly volumes that
can currently be supported.

RESPONSE: This interrogatory contains the term "flow-through process." Flow-
through processes apply to BellSouth's electronic ordering interfaces only,
as was explained in BellSouth's response to MCI's First Set of
Interrogatories Item No. 36. Subject to that clarification, all of BellSouth's
existing OSS are scalable, and are designed to accommodate both current
and projected volumes of LSRs. There are no "maximum" volumes.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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.

RESPONSE: BellSouth objects to the request to the extent that it is overly broad and unduly burdensome. Subject to this objection, and without waiving this objection, BellSouth has no information responsive to this request.

There are currently no pending conversions of any manual and/or semi-mechanized processes for the electronic ordering interfaces referenced in MCI-36 to MCI-50. Changes to the ordering OSS or the associated processes for ordering through the OSS are managed through BellSouth's Change Control Process (CCP). To the extent that BellSouth does not have in place OSS capabilities to support automated flow-through processes for products and/or services as described in Items 36-50 previous, a CLEC desiring such capabilities may submit to the CCP a change request for the automation of any product and/or service. At that time (assuming viability and acceptance of the change request by the CCP), all information as requested above would be developed and provided to the CLECs via the CCP.

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RESPONSE: (Cont.)

For the sake of efficiency for both CLEC and BellSouth operations, BellSouth attempts to be proactive in providing electronic ordering and flow-through capabilities for as many product/service offerings as practical. BellSouth's decision to mechanize is based upon a number of variables, including projected LSR submission volume, regulatory requirements, technical feasibility, and available release capacity for development and implementation.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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
current 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad
and unduly burdensome. Subject to this objection, and without waiving
this objection, BellSouth provides CLECs with nondiscriminatory access
to its Operations Support Systems (OSS) and the necessary information
contained therein in order that the functions of pre-ordering, ordering,
provisioning, maintenance and repair, and billing can be performed.
Nondiscriminatory access does not require that all detailed information
about loops must be available electronically and involve no manual
processes. BellSouth provides detailed information about the services and
UNEs that can be ordered and which interfaces may be used, and includes
whether the process is currently fully electronic (i.e., flows through),
partially electronic, or manual. This list is provided in the Flow-Through
Matrix, and was provided in the response to Interrogatory Item No. 37.
The Flow-Through Matrix is also available at the Performance
Measurement and Analysis Platform ("PMAP") website at
http://pmap.bellsouth.com/content/documentation.aspx.

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RESPONSE: (Cont.)

CLECs may also manually order resale and UNE POTS-type services. LSRs for services and UNEs may be faxed to the Local Carrier Service Center ("LCSC"). The LCSC is dedicated to handling CLEC LSRs and pre-ordering transactions, along with associated expedite requests and escalations. The LCSC also processes LSRs that are transmitted electronically via EDI, TAG, or LENS, but fall out by design or due to errors for manual handling, as well as those LSRs that cannot be submitted electronically. A list of LSRs that have fallen out for manual handling, whether by design or in error, is maintained in the Local Exchange Ordering System ("LEO") or Work Item Manager ("WIM") (WIM contains the list of LSRs for xDSL-compatible loops and UCLs that have fallen out for manual handling.)

CLECs and DLECs may manually report their end-user's voice and/or data troubles directly to the CWINS (Customer Wholesale Interconnection Network Services) Center. Maintenance Administrators (MAs) and/or Testing Technicians (TTs) utilize the proper OSS to handle the trouble condition. (For example, MAs use TAFI to process non-designed voice, Line Sharing and Line Splitting problems while TTs use WFA to enter trouble reports on designed services.)

BellSouth provides sufficient personnel and processes for the handling of manual processes and manages the personnel and processes in a manner that complies with the performance requirements of the various state public service commissions for timeliness and accuracy.

The current manual and/or semi-mechanized OSS processes for each of the service types in MCI-36 to MCI-50 offered by BellSouth is described in detail in the following BellSouth documents, posted to the Interconnection website:

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BellSouth Local Ordering Handbook, Section 2, *Pre-Ordering (*TCIF9 /
LSOG4, Release 13.0/ Version 13.0C)
http://interconnection.bellsouth.com/guides/leo/bbrlo_releases/13_0/pdf/1
30-2.pdf

BellSouth Pre-Ordering and Ordering Overview Guide
http://www.interconnection.bellsouth.com/guides/bpobr/pdf/bst_pr_1.pdf

BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guides
for Manual Loop Makeup
http://www.interconnection.bellsouth.com/guides/html/bpobr.html

LOH - Local Ordering Handbook (formerly named the "BellSouth
Business Rules for Local Ordering TCIF 9/LSOG 4")
http://interconnection.bellsouth.com/guides/html/leo.html

Local Exchange Ordering (LEO) Implementation Guide - Volume 1
http://interconnection.bellsouth.com/guides/html/leo.html

BellSouth Local Ordering Handbook (Section 3 – Ordering, TCIF9 /
LSOG 4, Release 13.0/ Version 13.0C)
http://interconnection.bellsouth.com/guides/leo/bbrlo_releases/13_0/pdf/1
30-3.pdf

BST Customized LSOG4 Forms
        LSR Request
        Form Instructions
http://www.interconnection.bellsouth.com/guides/html/leo.html

Also reference the individual CLEC Information Packages for specific
services, found at the Interconnection website at
http://interconnection.bellsouth.com/guides/html/unes.html

RESPONSE PROVIDED BY: Ronald M. Pate/Ken Ainsworth

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad
and unduly burdensome. Subject to this objection, and without waiving
this objection, BellSouth provides the following response.

This interrogatory contains the phrase "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interfaces only,
as explained in BellSouth's response toMCI First Set of Interrogatories
Item No. 36. With this definition in mind, BellSouth assumes that this
interrogatory is requesting pre-ordering information provided by
BellSouth that can be obtained electronically. This response is provided in
that context.

BellSouth plans enhancements to the Interconnection CLEC Enabler (ICE)
web-based application that allows CLECs and BellSouth Engineering
offices to handle xDSL and Manual Loop Make Up service inquiries. The
enhanced functionality will enable the CLEC to perform the following
additional tasks:

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RESPONSE: (Cont.)

- Cloning: Provides the ICE user the ability to clone both LMU and XDSL Service Inquiries. Once cloned, the duplicate service inquiry can then be updated and submitted via the ICE application to the proper centers for processing. This feature allows the CLEC to quickly create a new service inquiry based on data associated with an existing service inquiry without the CLEC having to type the majority of the information in a second time.

- LSR Supplement and Version (Update and/or Cancel): This functionality will allow a CLEC to update and/or cancel an existing service order, previously submitted via the ICE web based GUI application.

ICE preorder functionally offered by BellSouth is described in detail in the ICE documents provided in the response to MCI Interrogatory Item No. 36. One additional document, "ICE Requirements Specification and Cost Estimates," that supports the proposed ICE functionality, targeted for implementation in 4Q2003, is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q:

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad
and unduly burdensome. Subject to this objection, and without waiving
this objection, BellSouth currently has no planned enhancements to its
ordering OSS to support automated flow-through processes for ordering
for DS0/voice grade UNE loops.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Provisioning</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.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as explained in BellSouth's response to MCI First Set of
Interrogatories, Item No. 36. Consequently, there are no "automated,
flow-through processes" for provisioning of UNE loops of any service
type, and BellSouth currently has no planned OSS capabilities responsive
to this request.

RESPONSE PROVIDED BY: Jerry Latham

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Maintenance/Repair</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.

RESPONSE: BellSouth objects to this request to the extent it is overly broad and unduly
burdensome. Subject to this objection, and without waiving this objection,
BellSouth provides the following response.

This interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as explained in BellSouth's response to MCI First Set of
Interrogatories Item No. 36. With this definition in mind, BellSouth's
assumes that this interrogatory is requesting information related to trouble
reporting and tracking functions for maintenance and repair that are
provided by BellSouth and that can be obtained electronically.

The following maintenance and repair process enhancements are planned
to the TAFI system related to DS0/voice-grade UNE loops. This
functionality is targeted for 1Q2004 implementation:

- Modify the diagnostic flow to prohibit the user from changing
  direction if a Mechanized Loop Testing ("MLT") test has been
  initiated and the results have not been returned yet. Once the
  results have been returned, the user can change direction if
  necessary.
- Modify the diagnostic flow to prohibit the user from changing
  direction if a Predictor query (CO translation check) has been
  initiated and the results have not been returned yet. Once the
  results have been returned, the user can change direction if
  necessary.
- Enhance the Class of Service ("COS") determination (to determine
  if the customer is either Residence or Business) to look at the Loop
  Maintenance Operations System (LMOS) "COS" field if the

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RESPONSE: (Cont.)

existing CENT Fid (Centralized Customer Service Field Identifier) process yields indeterminate results.

The following documents, which are proprietary and are in MCI's possession, custody, or control as it was provided by BellSouth, pursuant to the protective agreement, in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q, describe in detail the enhancements listed above:

- TAFI Work Request #969 – Modify Diagnostic Flow
- TAFI Work Request #970 - COS determination

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Billing</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.

RESPONSE: This Interrogatory contains the term "flow-through processes," which apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI First Set of Interrogatories, Item No. 36. Consequently, there are no "automated, flow-through processes" for billing of UNE loops of any service type, and BellSouth currently has no planned OSS capabilities responsive to this request.

RESPONSE PROVIDED BY: Clyde Greene

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REQUEST: 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>DSL-
capable</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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 56.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad and unduly burdensome. Subject to this objection, and without waiving this objection, BellSouth provides the following response.

This interrogatory contains the term "flow-through processes." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as was defined in Interrogatory Item No. 36. This response is provided in that context.

CLECs should refer to technical reference TR73600 (found at http://www.interconnection.bellsouth.com/guides/html/tech_ref.html) and the CLEC Information Packages (found at BellSouth's interconnection website, http://www.interconnection.bellsouth.com/guides/html/unes.html) for the requested product/service to determine whether the individual product is supported on copper, IDLC or UDLC/NGDLC. BellSouth's ordering processes are the same regardless of the transmission media type used to provision the product/service.

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RESPONSE: (Cont.)

Following are the change requests pending implementation through BellSouth's Change Control Process (CCP):

CR0563 – Mechanization of XDSL, Request Type A, Activity Type of T for transfers. Submitted by Covad; targeted for implementation in Release 17.0, 3rd quarter 2004.

CR0622 – Loop Modification process to eliminate cancellation of CLEC order if BellSouth technician finds loaded loops exist on assigned facilities. Submitted by Covad; targeted for implementation in Release 16.0, 2nd quarter 2004.

CR0676 – Electronic Ordering of Line Sharing with DLEC Splitter. Submitted by AT&T; targeted for implementation in Release 15.0, 1st quarter 2004.

CR1147 – Allowing Line Sharing Data Migration without ECCKT. Submitted by Rhythms/WorldCom; targeted for implementation in Release 18.0, 4th quarter 2004.

Detailed explanations and statuses for these change requests may be found at the BellSouth interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_ccs.html. User requirement information for each feature of each release, as it is developed according to the CCP, may be found at BellSouth's interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html (select "Final User Requirements" from the pull-down list; login/password required).

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Provisioning</u> for <u>DSL-capable</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.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-through processes apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI First Set of Interrogatories, Item No. 36. Consequently, there are no "automated, flow-through processes" for provisioning of DSL-capable loops, and BellSouth currently has no planned OSS capabilities responsive to this request.

RESPONSE PROVIDED BY: Jerry Latham

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Maintenance/Repair</u> for
<u>DSL-capable</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.

RESPONSE: Please BellSouth's response to MCI First Set of Interrogatories Item No.
59.

The ability for a CLEC to enter a trouble report is the same regardless of
whether the UNE loops are provisioned on a) all-copper facilities; b)
hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper
facilities using UDLC or NGDLC. However, it should be noted that DSL-
capable UNE loops typically require a loop facility consisting of only non-
loaded metallic facilities. This is because some technologies, such as
High Bit-rate Digital Subscriber Line (HDSL), cannot be transported via
DLC due to the bandwidth employed. When a customer is served by DLC,
an Unbundled Local Loop providing such a wide bandwidth will not
typically be available. This can be provided at either the loop level, as in
a) all-copper facilities, but would only be provided at the sub-loop level,
as in b) hybrid fiber-copper facilities using IDLC and c) hybrid fiber-
copper facilities using UDLC or NGDLC.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Billing</u> for <u>DSL-capable</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.

RESPONSE: This Interrogatory contains the term "flow-through processes," which
apply to BellSouth's electronic ordering interface applications only, as
explained in BellSouth's response to MCI First Set of Interrogatories, Item
No. 36. Consequently, there are no "automated, flow-through processes"
for billing of DSL-capable UNE loops, and BellSouth currently has no
planned OSS capabilities responsive to this request.

RESPONSE PROVIDED BY: Clyde Greene

BellSouth Telecommunications, Inc.
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REQUEST: 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 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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 56.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of the planned ILEC OSS capabilities
to support automated, flow-through processes for Ordering for UNE loops
capable of supporting line splitting (*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.

RESPONSE: BellSouth objects to the Interrogatory to the extent that it is overly broad
and unduly burdensome. Subject to this objection, and without waiving
this objection, BellSouth provides the following response.

This interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as was defined in Interrogatory Item No. 36. This
response is provided in that context.

The ordering processes provided by BellSouth are the same regardless of
whether the UNE loops are provisioned on a) all-copper facilities; b)
hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper
facilities using UDLC or NGDLC. However, it should be noted that UNE
loops capable of supporting line splitting require a loop facility consisting
of only non-loaded metallic facilities. Line splitting UNEs may be
provided at either the loop level (CO-based line splitting), when served by
a) all-copper facilities, but would only be provided at the sub-loop level
(Remote Site Line Splitting), when served by b) hybrid fiber-copper
facilities using IDLC or c) hybrid fiber-copper facilities using UDLC or
NGDLC.

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RESPONSE: (Cont.)

Following are the change requests pending implementation through BellSouth's Change Control Process (CCP):

CR0622 – Mechanization of Loop Modification. Submitted by Covad; currently in "S" (Scheduled) status. Currently targeted for Release 16.0, 2nd quarter 2004.

CR1155 – Electronic Ordering for BellSouth-Owned Splitters in CLEC/DLEC Line Splitting Arrangements. Submitted by MCI; currently in "RC" (Candidate Request) status. Prioritized #8 of 21 in the CCP prioritization meeting held on 9/24/03; targeted for implementation in Release 18.0, 4th quarter 2004.

CR1262 – Change Due Date Interval for Line Splitting. Submitted by BellSouth; currently in "S" (Scheduled) status. Currently targeted for Release 15.0, 1st quarter 2004.

Detailed explanations and statuses for these change requests may be found at the BellSouth interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_ccs.html. User requirement information for each feature of each release, as it is developed according to the CCP, may be found at BellSouth's interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html (select "Final User Requirements" from the pull-down list; login/password required).

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
to support automated, flow-through processes for <u>Provisioning</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.

RESPONSE: This Interrogatory contains the term "flow-through processes." Flow-
through processes apply to BellSouth's electronic ordering interface
applications only, as explained in BellSouth's response to MCI First Set of
Interrogatories, Item No. 36. Consequently, there is no "automated, flow-
through processes" for provisioning of UNE loops capable of supporting
line splitting.

RESPONSE PROVIDED BY: Tommy Williams

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities
            to support automated, flow-through processes for <u>Maintenance/Repair</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.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 59.

            The ability for a CLEC to enter a trouble report is the same regardless of
            whether the UNE loops are provisioned on a) all-copper facilities; b)
            hybrid fiber-copper facilities using IDLC or c) hybrid fiber-copper
            facilities using UDLC or NGDLC. However, it should be noted that UNE
            loops capable of supporting line splitting require a loop facility consisting
            of only non-loaded metallic facilities. Line splitting UNEs may be
            provided at either the loop level (CO-based line splitting), when served by
            a) all-copper facilities, but would only be provided at the sub-loop level
            (Remote Site Line Splitting), when served by b) hybrid fiber-copper
            facilities using IDLC or c) hybrid fiber-copper facilities using UDLC or
            NGDLC.

            CLEC Trouble Administration Facilitation Interface (TAFI)
            BellSouth plans to enhance the TAFI system by modifying the TAFI flows
            to accommodate trouble reports on Remote Site Line Splitting. This
            functionality is targeted for 1Q2004 implementation. There are currently
            no documents responsive to this request.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of the <u>planned</u> ILEC OSS capabilities to support automated, flow-through processes for <u>Billing</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.

RESPONSE: This Interrogatory contains the term "flow-through processes," which apply to BellSouth's electronic ordering interface applications only, as explained in BellSouth's response to MCI First Set of Interrogatories, Item No. 36. Consequently, there are no "automated, flow-through processes" for billing of UNE loops capable of supporting line splitting, and BellSouth currently has no planned OSS capabilities responsive to this request.

RESPONSE PROVIDED BY: Clyde Greene

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REQUEST: To the extent that BellSouth's responses to 123 to 137 assert that
           BellSouth plans to deploy OSS capabilities to support automated, flow-
           through processes, please provide for each Data Request 123 to 137 the
           maximum daily, weekly and monthly volumes that could be supported.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 53.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed description of current and planned BellSouth OSS capabilities to support automated, flow-through single-order migration between each of the following service configurations: 1) BellSouth voice only 2) BellSouth voice plus data; 3) BellSouth data only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC data 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].

RESPONSE: The Flow-Through Matrix, referenced in the response to Interrogatory Item No. 37 and also available at the Performance Measurement and Analysis Platform ("PMAP") website at http://pmap.bellsouth.com/content/documentation.aspx provides information responsive to this request relative to current BellSouth OSS capabilities. The Flow Through Matrix provides detailed information about the services and UNEs that can be ordered and which interfaces may be used, and includes whether the process is currently fully electronic (i.e., flows through), partially electronic, or manual, on the single LSR process.

The OSS capabilities offered by BellSouth supporting migrations are described in detail in the following BellSouth documents, posted to the Interconnection website:

LOH - Local Ordering Handbook (formerly named the "BellSouth Business Rules for Local Ordering TCIF 9/LSOG 4")
http://interconnection.bellsouth.com/guides/html/leo.html

UNE-P to UNE-L Bulk Migration CLEC Information Package
http://interconnection.bellsouth.com/guides/html/unes.html

UNE to UNE Bulk Ordering Specifications for EDI TCIF Issue 9 Trading Partners
http://interconnection.bellsouth.com/guides/leo/pdf/tcif9_bulkspec.pdf

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RESPONSE: (Cont.)

UNE to UNE Bulk Ordering Specifications for EDI ELMS6 Trading Partners
http://interconnection.bellsouth.com/guides/leo/pdf/elms_6_bulkspec.pdf

CLEC to CLEC Conversion for Unbundled Loops
http://interconnection.bellsouth.com/guides/html/unes.html

Also, please reference the individual CLEC Information Packages for specific products and services, found at the Interconnection website at
http://interconnection.bellsouth.com/guides/html/unes.html

As for planned changes to flow-through capabilities, please see the flow-through change requests at
http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_ccs.html.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: Please provide a detailed description of current and planned BellSouth OSS capabilities to support automated, flow-through single-order migration from 1) BellSouth to CLEC; 2) CLEC to CLEC and 3) CLEC to BellSouth, for each of the following: a) adding or dropping local exchange voice service from line shared or line split DSL; b) adding or dropping DSL service from line shared or line split local exchange voice service.

RESPONSE: The following is responsive to the request for current and planned BellSouth OSS for migration from 1) BellSouth to CLEC and 2) CLEC to CLEC:

The Line Splitting/Line Sharing Scenario Matrix, the Product Matrix, and the Line Sharing Subsequent Order Matrix documents are already in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Request for Production, No. 1, in NCUC Docket No. P-100, Sub 133q and are also available at the Line Sharing Collaboratives Website at http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab /index.html provides information responsive to this request relative to current BellSouth OSS capabilities. These matrices provide detailed information about the UNEs that can be ordered and includes whether the process is currently fully electronic (i.e., flows through), partially electronic, or manual, on the single LSR process. Those UNEs that can be ordered electronically may be ordered using any of the electronic ordering interfaces (TAG, EDI or LENS).

The OSS capabilities offered by BellSouth supporting migrations are described in detail in the following BellSouth documents, posted to the Interconnection website:

LOH - Local Ordering Handbook (formerly named the "BellSouth Business Rules for Local Ordering TCIF 9/LSOG 4")
http://interconnection.bellsouth.com/guides/html/leo.html

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RESPONSE: (Cont.)

CLEC to CLEC Conversion for Unbundled Loops
http://interconnection.bellsouth.com/guides/html/unes.html

CO-Based Line Sharing
   BellSouth Owned Splitter
   - ADSL to DLEC Data Migration
   - BellSouth Voice to CLEC Voice
   - Customer Movement Answers
   - DLEC to ADSL Data Migration
   - DLEC to DLEC Data Migration
   CLEC Owned Splitter
   - ADSL to DLEC Data Migration
   - BellSouth Voice to CLEC Voice
   - DLEC to ADSL Data Migration
   - DLEC to DLEC Data Migration
RS Based - Line Sharing
   BellSouth Owned Splitter
   - ADSL to DLEC Data Migration
   - DLEC to ADSL Data Migration
   - DLEC to DLEC Data Migration
   CLEC Owned Splitter
   - ADSL to DLEC Data Migration
   - DLEC to ADSL Data Migration
   - DLEC to DLEC Data Migration
CO Based - Line Splitting
   BellSouth Owned Splitter
   - LSpl to BST Voice Move
   - LSpl to CLEC Voice Move
   CLEC Owned Splitter
   - LSpl to BST Voice Move
   - LSpl to CLEC Voice Move
   - UNE-P to Line Splitting Order Process Flow

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RESPONSE: (Cont.)

RS Based - Line Splitting
    CLEC Owned Splitter
    ▪ RS Line Splitting Ph 1 Scenarios
http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/index.html

Also, please reference the individual CLEC Information Packages for specific products and services, found at the Interconnection website at http://interconnection.bellsouth.com/guides/html/unes.html

As for planned changes to flow-through capabilities, there is one outstanding Change Request:

CR1155 – Electronic Ordering for BellSouth-Owned Splitters in CLEC/DLEC Line Splitting Arrangements. Submitted by MCI; currently in "RC" (Candidate Request) status. Prioritized #8 of 21 in the CCP prioritization meeting held on 9/24/03; targeted for implementation in Release 18.0, 4th quarter 2004.

Detailed explanations for this change request may be found at the BellSouth interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_ccs.html. User requirement information for each feature of each release, as it is developed according to the CCP, may be found at BellSouth's interconnection website at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html (select "Final User Requirements" from the pull-down list; login/password required).

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RESPONSE: (Cont.)

The following is responsive to the request for current and planned
BellSouth OSS for migration from 3) CLEC to BellSouth:

a) adding or dropping local exchange voice service from line shared or
line split DSL - Line shared DSL service is provisioned on an existing
local exchange voice service, therefore, it is impossible to add local
exchange voice service to line shared DSL, and there are no current or
planned OSS capabilities to support this type of migration. Line Shared
DSL service is disconnected if the underlying local exchange service is
disconnected. Should the CLEC desire to continue to provide the DSL
service after the underlying local exchange service is disconnected, they
have the option of purchasing the entire loop. There are currently no plans
being developed to support automated, flow-through single-order
migration of DSL service when local exchange voice service is migrated
from a CLEC to BellSouth. Line Split DSL is provisioned over a UNE-
Loop, and one of the two CLEC parties has ownership of the loop, and
may add or drop local exchange service as they wish, unbeknownst to
BellSouth. Therefore, there are currently no plans being developed to
support automated, flow-through single-order OSS capabilities.

b) adding or dropping DSL service from line shared or line split local
exchange voice service - All BellSouth DSL orders for lines that have
existing CLEC DSL service via line sharing or line splitting fall out for
manual processing. Once the existing DSL service is identified, the
service representative handling the order will follow the disconnect
process consistent with the interconnection agreement, and then provision
the BellSouth DSL service on the line. There are currently no plans being
developed to support automated, flow-through single-order migration of
DSL service from a CLEC to BellSouth.

RESPONSE PROVIDED BY: Ronald M. Pate/Eric Fogle

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning loop and transport facilities is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action, which concerns switching.

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REQUEST: To the extent that the response to 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning loop and transport facilities is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action, which concerns switching.

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REQUEST: 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).

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning the OSS used by BellSouth's retail services it is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: 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).

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning the OSS used by BellSouth's subsidiaries or affiliates it is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: Please provide a list of all OSS used by BellSouth for pre-ordering,
ordering, provisioning, maintenance and repair and billing for <u>CLEC</u>
<u>UNE-P</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).

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth, pursuant
to the protective agreement, in response to MCI's 1st Request for
Production, No. 1, in NCUC Docket No. P-100, Sub 133q.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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).

RESPONSE: BellSouth objects to the Interrogatory on grounds that information
            concerning loop and transport facilities is not reasonably calculated to lead
            to the discovery of admissible evidence and it is not relevant to the subject
            matter of this action, which concerns switching.

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REQUEST: 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 partiall or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning the OSS used by BellSouth's retail services it is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

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REQUEST: 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
             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 partiall or completely answered by
             producing existing drawings, charts, or other documents, please identify
             for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
             concerning the OSS used by BellSouth's subsidiaries or affiliates is not
             reasonably calculated to lead to the discovery of admissible evidence and
             it is not relevant to the subject matter of this action.

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REQUEST: 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
             partiall or completely answered by producing existing drawings, charts, or
             other documents, please identify for disclosure all such drawings, charts,
             or other documents.

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information in
             a format not maintained by BellSouth in the ordinary course of its business
             on the grounds that it is overly broad, unduly burdensome, and oppressive.
             Subject to this objection, and without waiving this objection, the
             information responsive to this request is proprietary and is in MCI's
             possession, custody, or control as it was provided by BellSouth, pursuant
             to the protective agreement, in response to MCI's 1st Request for
             Production, No. 1, in NCUC Docket No. P-100, Sub 133q. See
             BellSouth's response to MCI First Set of Interrogatories Item No. 78 for
             the full system name and a description of the capabilities and function of
             each system.

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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>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 partiall or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning loop and transport facilities is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action, which concerns switching.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed process flow chart 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 partiall or completely answered by
producing existing drawings, charts, or other documents, please identify
for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning the OSS used by BellSouth's retail services it is not reasonably
calculated to lead to the discovery of admissible evidence and it is not
relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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REQUEST: 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 <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 partiall or
completely answered by producing existing drawings, charts, or other
documents, please identify for disclosure all such drawings, charts, or
other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning the OSS used by BellSouth's subsidiaries or affiliates is not
reasonably calculated to lead to the discovery of admissible evidence and
it is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed process flow chart 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 partiall or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

RESPONSE: See BellSouth's response to MCI First Set of Interrogatories Item No. 82.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
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REQUEST: Please provide a detailed process flow chart 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 partiall or completely answered by
            producing existing drawings, charts, or other documents, please identify
            for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
            concerning loop and transport facilities is not reasonably calculated to lead
            to the discovery of admissible evidence and is not relevant to the subject
            matter of this action, which concerns switching.

BellSouth Telecommunications, Inc.
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REQUEST: 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 partiall or completely
answered by producing existing drawings, charts, or other documents,
please identify for disclosure all such drawings, charts, or other
documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning the OSS used by BellSouth's retail services it is not reasonably
calculated to lead to the discovery of admissible evidence and it is not
relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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REQUEST: 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 partiall or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning the OSS used by BellSouth's subsidiaries or affiliates is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information that is already a matter of public record or is otherwise publicly available BellSouth further objects to this Interrogatory to the extent it seeks information in a format not maintained by BellSouth in the ordinary course of its business on the grounds that it is overly broad, unduly burdensome, and oppressive. Subject to these objections, and without waiving these objections, BellSouth provides the following response.

BellSouth's business rules for its various OSS functions are inclusive of all services available to CLECs via the interface for which the specific business rules apply. Rules related specifically to UNE-P are included as a subset of the business rules.

BellSouth indicates below the websites for available business rule documentation and contain the specified or implied rules for UNE-P services, as applicable.

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REQUEST: (Cont.)

The BellSouth Local Ordering Handbook (LOH) contains the business rules for BellSouth's pre-ordering and ordering OSS, including Local Exchange Navigation System (LENS), Telecommunications Access Gateway (TAG), and Electronic Data Interchange (EDI). The LOH is available at the BellSouth interconnection website at
http://interconnection.bellsouth.com/guides/index.html

BellSouth's maintenance and repair OSS include the following, and the business rules for those systems may be found at the BellSouth interconnection at website shown below:

Circuit Provisioning Status System – Trouble Administration (CPSS-TA)
http://www.interconnection.bellsouth.com/guides/statusing/pdf/eccpss.pdf

Trouble Analysis Facilitation Interface (TAFI)
http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

Electronic Communications Trouble Administration System (ECTA)
http://www.interconnection.bellsouth.com/guides/activation/pdf/clec_jia.pdf

BellSouth offers to CLECs the ability to receive billing information in a variety of bill formats through different delivery options. The business rules for BellSouth's billing OSS are found at the BellSouth interconnection website at
http://www.interconnection.bellsouth.com/guides/html/billing.html

RESPONSE PROVIDED BY: Ronald M. Pate

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REQUEST: 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 partiall or completely answered by producing existing drawings, charts, or other documents, please identify for disclosure all such drawings, charts, or other documents.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning loop and transport facilities is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, which concerns switching.

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REQUEST: 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.

RESPONSE: BellSouth objects to this interrogatory on the grounds that it seeks
information that is not relevant to this proceeding and is not reasonably
calculated to lead to the discovery of admissible evidence. Subject to and
without waiving that objection, BellSouth states that it has a batch hot cut
process. The requirements for the process are set forth on Bellsouth's
website.

For the configurations listed in this request that are not addressed by
BellSouth's batch hot cut process, BellSouth offers the process described
in response to MCI First Set of Interrogatories Item No. 94. This process
will accommodate up to 14 "hot cuts" using standard intervals and will
accommodate 15 or more "hot cuts" using intervals set according the
Project Management process.

RESPONSE PROVIDED BY: Ken Ainsworth
                            Jerry Latham

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REQUEST: With regard to your response to 159, please indicate whether your electronic back end systems can accomplish each migration type on each of the following bases:
(a) automated flow-through batch cuts [please indicate the maximum number of simultaneous loop migrations that you can support];
(b) automated flow-through individual loop hot cuts;
(c) manual batch cuts [please indicate the maximum number of simultaneous loop migrations that you can support]
(d) manual individual loop hot cuts.

RESPONSE: Electronic individual and batch hot cut orders can and do flow-through BellSouth's ordering systems. With respect to the provisioning systems, see BellSouth's response in MCI First Set of Interrogatories Item Nos. 13, 33, 35, 36 & 38. All of BellSouth's systems, whether electronic or manual, are scalable.

RESPONSE PROVIDED BY: Ken Ainsworth

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this request on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, BellSouth has a very well documented process for performing hot cuts, which ensures end user service outage is minimal. BellSouth's process provides for:

1. Pre-wiring and pre-testing of all wiring prior to the due date.
2. Verification of dial tone from the CLEC's switch.
3. Verification of correct telephone number from the CLEC switch using a capability referred to as Automatic Number Announcement ("ANAC").
4. Monitoring of the line prior to actual wire transfer to ensure end user service is not interrupted.
5. Notification to the CLEC that the transfer has completed.

In addition to the activities listed above, coordinated hot cuts (including Time Specific Coordinated hot cuts) also include:

1. Notification to the CLEC of CLEC wiring errors, dial tone or ANI problems.

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RESPONSE: (Cont.)

2. Verification of end user information with the CLEC prior to the conversion.
3. Verification with the CLEC of cut date and or time 24 – 48 hours prior to the conversion date.
4. Joint acceptance testing, if necessary, with the CLEC to ensure the transfer is successful and number porting is complete.

Further, BellSouth has processes in place to prevent premature disconnect of an end user line where changes have occurred to the due date for the conversion, whether the change is due to BellSouth or CLEC reasons.

Additional information response to this request is contained in BellSouth's response to MCI First Set of Interrogatories Item No. 33.

RESPONSE PROVIDED BY: Jerry Latham

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REQUEST: 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.

RESPONSE: BellSouth objects to this request on the grounds that it seeks information
that is not relevant to this proceeding and not reasonably calculated to lead
to the discovery of admissible evidence. Subject to and without waiving
that objection, BellSouth responds that this request is not applicable.

RESPONSE PROVIDED BY: Jerry Latham

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this request on the grounds that it seeks information
that is not relevant to this proceeding and not reasonably calculated to lead
to the discovery of admissible evidence. Subject to and without waiving
that objection, BellSouth responds that this request is not applicable.

RESPONSE PROVIDED BY: Jerry Latham

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REQUEST: Please provide the following information regarding (1) the Class 5 (end office) circuit switch most recently installed in Floroida by BellSouth, and (2) any planned new installations of a Class 5 (end office) circuit switch in Kentucky by BellSouth:

        a) manufacturer;
        b) model;
        c) date to be placed in service;
        d) location (street address, city, and zip code);
        e) CLLI code and (f) V&H coordinates.

RESPONSE: Information responsive to this request is available via the following URL link:

        http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-15/

        The file name is AL_29054_BST_Resp_to_MCI_1_POD.pdf
            (Bates Range BST001129-BST001134)

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: 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).

RESPONSE: BellSouth objects to this Interrogatory to the extent that it seeks to obligate BellSouth to respond on behalf of 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. Specifically, this request seeks information about switches in use by non-party cable operators – information that MCI should seek from the cable operators themselves, and not BellSouth.

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REQUEST: 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) identify for disclosure 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).

RESPONSE: BellSouth objects to this Interrogatory to the extent that it seeks to obligate BellSouth to respond on behalf of 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. Specifically, this request seeks information about switches in use by CMRS operators – information that MCI should seek from the CMRS operators themselves, and not BellSouth.

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REQUEST: With regard to all CLEC to CLEC cross connections you have
            provisioned, please identify the following, reported by wire center:

            (a) number of such cross connections that you have provisioned;
            (b) the identity of both CLECs to whom you provisioned the cross connect
            (c) the type of collocation arrangement of both CLECs;
            (d) the minimum, maximum and , average provisioning time for CLEC to
            CLEC cross connections;
            (e) the identity of the entity or personnel who performs the cross connect
            (e.g. ILEC central office technician, certified CLEC technician, etc.)

RESPONSE: (a) BellSouth does not have information that reflects the number of co-
                carrier cross connects (where collocation arrangements of two
                different carriers in the same central office or wire center are directly
                connected to each other) that exist in each BellSouth wire center (WC)
                in Kentucky. BellSouth permits two collocators to directly cross-
                connect their collocation space in BellSouth's WCs. If the two
                collocation spaces are not contiguous, then the collocators must
                employ a BellSouth Certified Supplier to run their cabling between the
                two collocation arrangements utilizing BellSouth's common cable
                support structure. If the collocator's equipment and the equipment of
                the other carrier are located in contiguous caged collocation space, the
                collocator may use its own technician to install a co-carrier cross
                connect between the equipment of both collocated carriers by
                constructing a dedicated cable support structure between the two
                contiguous cages.

            (b) See BellSouth's response to Item No. 105.   Furthermore, as stated
                above, BellSouth allows two collocators to provision the co-carrier
                cross connects directly between their collocation arrangements.
                However, a BellSouth Certified Supplier must be hired to run the
                cabling between the two arrangements, which utilizes BellSouth's
                common cable support structure. If the two collocation spaces are
                contiguous, then BellSouth permits the collocators to use their own
                technicians to install the co-carrier cross connects between the
                equipment of both carriers by constructing a dedicated cable support
                structure between the two contiguous cages.

            (c) See BellSouth's response to Item No. 105.

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RESPONSE (Cont'd.):

(d) Since the two collocators would be contracting with a BellSouth
Certified Supplier to provision the co-carrier cross connects between
their collocation arrangements, the provisioning time would be
determined by the collocators, not BellSouth. The actual provisioning
time would be dependent upon when one of the two collocators
submits a Method of Procedure ("MOP") to the BellSouth foreman in
the specific WC in which the co-carrier cross connect will be placed
and the BellSouth Certified Supplier hired by the collocator begins the
placement of the necessary cabling in the central office.

(e) A BellSouth Certified Supplier, employed by the one of the two cross
connecting collocators, would be the entity performing the installation
of the cabling that would allow the two collocators to cross connect to
each other's collocation space. BellSouth's personnel would not
perform any activities associated with the installation of co-carrier
cross connects in wire centers in Kentucky.
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RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: For each BellSouth central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, please provide the following information:

(a) the CLLI code, street address, zip code, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
(b) the CLLI code, street address, zip code, V&H coordinates, and owner(s) of the switch(es) to which such EELs are connected;
(c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
(d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
(e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
(f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
(g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
(h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
(i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
(j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio;
(k) what equipment is required to deploy EELs;
(l) whether collocation is required for CLECs to utilize EELs;
(m) the concentration ratio allowed for EELs.

RESPONSE: See BellSouth's response to MCI's 1st Set of Data Requests, Item No. 10

RESPONSE PROVIDED BY: Michael Hurst

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REQUEST: Please provide the definition you use internally for business purposes for the following terms: (1) "mass market customer" and (2) "enterprise customer," in terms of type of customer (e.g., residential vs. business), number of lines per customer, use of analog loop facilities vs. DS-1s, or any other basis you use to distinguish these terms.

RESPONSE: BellSouth does not use the term "mass market" internally for business purposes, except to refer to small business customers that spend less than $3,000 annually. BellSouth considers business customers that bill more than $1 million annually to be an "enterprise" customer, although this is not a strict definition given that the segment can vary depending upon other factors, including locations, types of services ordered, and type of industry. For purposes of this proceeding, BellSouth accepts the FCC default delineation between "mass market" customers and "enterprise customers by which customers with three or fewer DS0 lines serving them are "mass market" customers and customers with more than three DS0 lines serving them are "enterprise" customers.

RESPONSE PROVIDED BY: John Ruscilli
                             Susan Callaghan

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REQUEST: Please state whether you view a crossover point between mass market
customers and enterprise customers set at 4 DS-0/voice grade lines per
customer to have any economic, engineering, operational, or business
basis from the perspective of your non-regulatory business purposes. If
your response is not an unqualified "no," please explain such basis in
detail and provide supporting documentation.

RESPONSE: See BellSouth's Response to MCI's First Set of Interrogatories, Item No.
110.

RESPONSE PROVIDED BY: John Ruscilli

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REQUEST: Please provide your calculation, estimate, or view of the economic
           crossover point , in terms of number of DS-0/voice grade lines to a single
           customer premises, at which you offer service at a DS-1 level rather than
           using a number of analog lines, and provide the basis for that crossover
           point (e.g., equivalency point of analog service rates and DS-1 service
           rates, consideration of whether the customer premises equipment can
           accept a DS-1 interface, etc.).

RESPONSE: See BellSouth's Response to MCI's First Set of Interrogatories, Item No.
           110.

RESPONSE PROVIDED BY: John Ruscilli

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REQUEST: With respect to each of the two customer categories identified in response
to MCI-169, please provide the following information:

(a) the number of customers in each category, reported by central
office/wire center for each month since July 1, 2001;
(b) the percentage of your total customer base in Tennessee in each of the
two categories;
(c) whether you target your business plans or marketing to particular sub-
sets of customers within each of the two categories identified in response
to 110.

RESPONSE: The information responsive to this request is in MCI's possession,
custody, or control as it was provided by BellSouth in response to MCI's
First Set of Interrogatories, Item No. 113 and MCI's First Request for
Production, Item No. 1 in AL Dkt No. 29054.

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REQUEST: Please identify, by CLLI code, city, street address and zip code, all
switches you have deployed in Kentucky in density zone 1 of the top 50
largest Metropolitan Statistical Areas (MSAs), and whether each of those
switches is subject to the FCC's unbundled switching "carve out."

RESPONSE: BellSouth does not have a top 50 MSA in Alabama.

RESPONSE PROVIDED BY: Kathy Blake

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REQUEST: Please state the technical characteristics and capabilities of all loops that you consider to be a DS-0 and/or voice grade loop, and provide any relevant public and/or confidential technical publications and any other documents that describe these characteristics and capabilities.

RESPONSE: Loops used to provide voice grade services, sometimes denoted as 'DS0' loops, were historically defined in IEEE-820. Because that document is outdated, Committee T1 has written a new document entitled, "Technical Report No. 60, Unbundled Voice Grade Analog Loops." This new document describes the characteristics and capabilities of voice grade loops.

BellSouth also maintains a document on unbundled loops, some of which are voice grade loops. That document is entitled, "Technical Reference 73600, Unbundled Loop Technical Specifications." This document addresses some specifications that are not included in the industry-wide document.

The documents responsive to this request are in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's First Request for Production, Item No. 1 in NCUC Docket No. P-100, Sub 133q.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please state the technical characteristics and capabilities of a DSL-capable loop, and provide any relevant public and/or confidential technical publications and any other documents that describe these characteristics and capabilities.

RESPONSE: It should be recognized that the term "DSL-capable" can be interpreted a number of different ways. Some DSL technologies, such as Asymmetrical Digital Subscriber Line ('ADSL"), can be used over much longer loops than can other DSL technologies, such as Very high data rate Digital Subscriber Line ("VDSL"). Even if the focus of this question is limited to only ADSL, there is still some imprecision. Some carriers, for instance, might want their ADSL to provide several megabits per second, which necessarily requires shorter loops. Others might be interested in providing service on longer loops, which typically result in lower data rates.

A standard sometimes used to classify a loop as "DSL-capable" is the absence of load coils. The industry has written a specification for such loops entitled, "Technical Requirement for Non-loaded Metallic Loops Supporting Basic Voicegrade Services."

BellSouth also maintains a document on unbundled loops, some of which are DSL-capable. That document is entitled, "Technical Reference 73600, Unbundled Loop Technical Specifications." This document addresses some specifications that are not included in the industry-wide document.

The documents responsive to this request are in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's First Request for Production, Item No. 1 in NCUC Docket No. P-100, Sub 133q.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST :   Please state the technical characteristics and capabilities of loops capable
of supporting 1) line sharing and 2) line splitting (*i.e.* voice service and
DSL service carried on a single wire pair entering the customer's
premises), and provide any relevant public and/or confidential technical
publications and any other documents that describe these characteristics
and capabilities.

RESPONSE: The following is the most recent version (distributed with the Agenda for
the November 13, 2003 BST-Line Splitting/Line Sharing Collaborative
meeting (of which MCI is a member)

**PROPOSED STANDARDS AND PROCEDURES FOR LINE
SHARING/SPLITTING LOOP PARAMETERS**

The following standards apply to loops that will be shared for the
provision of voice and high-speed data services (such as ADSL) to an end
user through line sharing or line splitting services. Stand-alone UNE
loops used to provide data services already have standards established, and
while similar, are not addressed with this document.

Line Sharing / Line Splitting Loop
*   In order to qualify as loop capable of line sharing or line splitting,
the facility must be a non-loaded copper circuit, 1300 Ohms or less.
*   BST will not unload loops longer than 18kft that are presently
loaded.
*   CLECs are required to qualify a circuit prior to issuing an order for
line sharing or line splitting.
*   If, during its qualification search, a CLEC discovers a copper loop
that does not meet these standards, but the circuit could be made to
meet the standards through routine network modifications, BST, at the
request of the CLEC, will condition the circuit according to the ULM
process.
*   The loop shall meet the Specifications found in sections 3.9, 3.10,
and 3.11 of Bellsouth TR73600, Issue 7 (June 2003). It should be
noted, though, that foreign voltage (covered in section 3.9) and
insulation resistance (covered in section 3.10) cannot be accurately
measured on a line-sharing loop in the normal condition. These

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RESPONSE: (continued)

parameters can be measured using BellSouth's switch-based test system, or they can be measured with a CLEC's test equipment, if the CO line circuit is disconnected.

RESPONSE PROVIDED BY: Tommy G. Williams

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, monthly data since July 1, 2001 on the number of loops carrying
<u>DS-0/voice grade service</u> on all of the following bases:

1) total loops in service
2) residential loops in service;
3) business loops for business with 1-3 loops in service;
4) business loops for businesses with more than 3 loops in service;
5) UNE loops.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's First Request for Production, Item No. 1 (Bates Range
BST001167-BST001294) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: Steve Bigelow
                          Craig Williard

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, monthly data since July 1, 2001 on the number of loops carrying
<u>standalone DSL service</u> on all of the following bases:

1) total loops in service
 2) residential loops in service;
 3) business loops for business with 1-3 loops in service;
 4) business loops for businesses with more than 3 loops in service;
5) UNE loops.

RESPONSE:

1-4)   There are no Stand Alone DSL products provisioned in Kentucky.
5)   BellSouth is unable to determine the number of Stand Alone DSL
        lines provisioned on UNE Loops purchased by CLECs.

RESPONSE PROVIDED BY: Eric Fogle

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, monthly data since July 1, 2001 on the number of loops carrying
line shared voice plus DSL service on all of the following bases:

1) total loops in service
2) residential loops in service;
3) business loops for business with 1-3 loops in service;
4) business loops for businesses with more than 3 loops in service;
5) UNE loops.

RESPONSE:
Monthly data since July1, 2001 on the number of loops carrying line shared voice
plus DSL service on all of the following bases:
a) STATEWIDE
    1) TOTAL LOOPS IN SERVICE
        Jul 2001   179
        Aug 2001   239
        Sep 2001   232
        Oct 2001   253
        Nov 2001   320
        Dec 2001   323
        Jan 2002   390
        Feb 2002   418
        Mar 2002   434
        Apr 2002   506
        May 2002   484
        Jun 2002   493
        Jul 2002   509
        Aug 2002   538
        Sep 2002   474
        Oct 2002   471
        Nov 2002   474
        Dec 2002   459
        Jan 2003   480
        Feb 2003   612
        Mar 2003   643
        Apr 2003   643

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RESPONSE: (a. continued)
                    May 2003   665
                    Jun 2003   736
                    Jul 2003   837
                    Aug 2003   874
                    Sep 2003   925
                    Oct 2003   987

2) RESIDENTIAL LOOPS IN SERVICE
   BellSouth captures data regarding Line Sharing on the CLEC record in
   CABS and not the end user's record. Accordingly, information
   regarding the CLEC's customers is not available to BellSouth.

3) BUSINESS LOOPS FOR BUSINESS WITH 1-3 LOOPS IN
   SERVICE
   BellSouth captures data regarding Line Sharing on the CLEC record in
   CABS and not the end user's record. Accordingly, information
   regarding the CLEC's customers is not available to BellSouth.

4) BUSINESS LOOPS FOR BUSINESSES WITH MORE THAN 3
   LOOPS IN SERVICE
   BellSouth captures data regarding Line Sharing on the CLEC record in
   CABS and not the end user's record. Accordingly, information
   regarding the CLEC's customers is not available to BellSouth.

5) UNE LOOPS
   When a CLEC purchases a UNE Loop from BellSouth, the CLEC is
   not required to inform BellSouth of the CLEC's, or CLEC's end
   user's, ultimate intended purpose for the UNE Loop. Accordingly,
   this CLEC proprietary data is not available to BellSouth, and
   BellSouth is unable to answer this Interrogatory.

b) CLLI-CODE-SPECIFICc
   CLLI-code-specific monthly data since July 1, 2001 on the number of loops
   carrying line shared voice plus DSL service is not available.

RESPONSE PROVIDED BY: Tommy G. Williams

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying <u>line split voice plus DSL service</u> on all of the following bases:

1) total loops in service
2) residential loops in service;
3) business loops for business with 1-3 loops in service;
4) business loops for businesses with more than 3 loops in service;
5) UNE loops.

RESPONSE: The attached information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this proceeding.

RESPONSE PROVIDED BY: Tommy G. Williams

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Attachment
EDITED

Monthly data since July1, 2001 on the number of loops carrying <u>line split voice plus DSL service</u> on all of the following bases:

a) <u>STATEWIDE</u>

TOTAL LOOPS IN SERVICE (including test cases)

Jul 2001 – Nov 2001	NONE
Dec 2001	8
Jan 2002	8
Feb 2002	8
Mar 2002	8
Apr 2002	8
May 2002	8
Jun 2002	10
Jul 2002	10
Aug 2002	14
Sep 2002	14
Oct 2002	14
Nov 2002	14
Dec 2002	14
Jan 2003	14
Feb2003	14
Mar 2003	14
Apr 2003	14
May 2003	14
Jun 2003	14
Jul 2003	14
Aug 2003	14
Sep 2003	14
Oct 2003	11

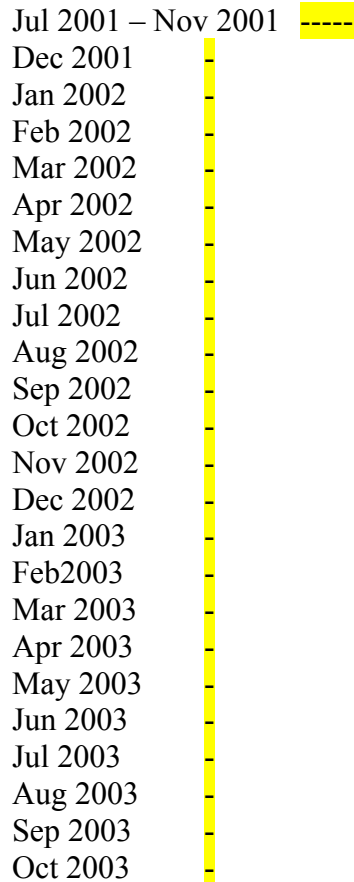RESIDENTIAL LOOPS IN SERVICE (including test cases)

Jul 2001 – Nov 2001   -----
Dec 2001   -
Jan 2002   -
Feb 2002   -
Mar 2002   -
Apr 2002   -
May 2002   -
Jun 2002   -
Jul 2002   -
Aug 2002   -
Sep 2002   -
Oct 2002   -
Nov 2002   -
Dec 2002   -
Jan 2003   -
Feb2003   -
Mar 2003   -
Apr 2003   -
May 2003   -
Jun 2003   -
Jul 2003   -
Aug 2003   -
Sep 2003   -
Oct 2003   -

BUSINESS LOOPS FOR BUSINESS WITH 1-3 LOOPS IN SERVICE

BellSouth does not separate Business Line Splitting into 1-3 loops and more than 3 loops. Accordingly this data is not available. However, the total of all Business loops including test cases is as follows:

Jul 2001 – May 2002   ----
Jun 2002   -
Jul 2002   -
Aug 2002   -
Sep 2002   -
Oct 2002   -
Nov 2002   -
Dec 2002   -
Jan 2003   -
Feb2003   -
Mar 2003   -
Apr 2003   -
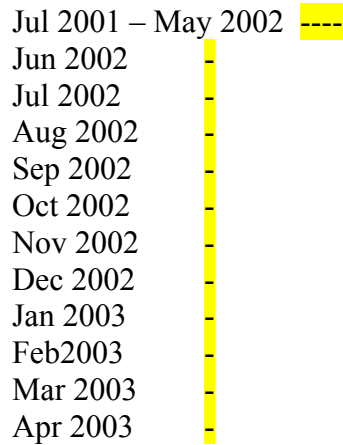
BUSINESS LOOPS FOR BUSINESS WITH 1-3 LOOPS IN SERVICE

    May 2003   -
    Jun 2003   -
    Jul 2003   -
    Aug 2003   -
    Sep 2003   -
    Oct 2003   -

BUSINESS LOOPS FOR BUSINESSES WITH MORE THAN 3 LOOPS
IN SERVICE
    BellSouth does not separate Business Line Splitting into 1-3 loops and
    more than 3 loops. Accordingly this data is not available. However,
    the total of all Business loops including test cases is as follows:
        Jul 2001 – May 2002 ----
        Jun 2002   -
        Jul 2002   -
        Aug 2002   -
        Sep 2002   -
        Oct 2002   -
        Nov 2002   -
        Dec 2002   -
        Jan 2003   -
        Feb2003   -
        Mar 2003   -
        Apr 2003   -
        May 2003   -
        Jun 2003   -
        Jul 2003   -
        Aug 2003   -
        Sep 2003   -
        Oct 2003   -

    UNE LOOPS
        When a CLEC purchases a UNE Loop from BellSouth, the CLEC is
        not required to inform BellSouth of the CLEC's, or CLEC's end
        user's, ultimate intended purpose for the UNE Loop. Accordingly,
        this CLEC proprietary data is not available to BellSouth, and
        BellSouth is unable to answer this Interrogatory.

b) CLLI-CODE-SPECIFICc
   CLLI-code-specific monthly data since July 1, 2001 on the number of loops
   carrying line split voice plus DSL service is not available.

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific basis, monthly data since July 1, 2001 on the number of loops carrying <u>ILEC voice plus DSL service</u> on all of the following bases:

1) total loops in service
2) residential loops in service;
3) business loops for business with 1-3 loops in service to a single customer premises;
4) business loops for businesses with more than 3 loops in service to a single customer premises;

.

RESPONSE: BellSouth does not maintain DSL and loop historical information on a monthly basis. Data is available for the following dates: 7/31/2002, 12/31/2002, 2/28/2003, 4/30/2003, 6/30/2003, and 7/31/2003.

The information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's First Request for Production, Item No. 1 (Bates Range BST001295-BST001365) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: Eric Fogle

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REQUEST: Please provide, a) on a statewide basis, and b) on a CLLI-code-specific
basis, monthly data since July 1, 2001 on the number of loops that are
provisioned using :

1) all-copper facilities;
2) hybrid fiber/copper facilities;
3) all-fiber facilities
4) IDLC:
5) UDLC;
6) NGDLC;
7) DAML.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's First Request for Production, Item No. 1(Bates Range
BST001366-BST001896) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please state whether you currently provision UNE loops over loops
provisioned using 1) IDLC and 2) NGDLC. Please provide a copy of any
methods and procedures, technical service descriptions, and other
technical documents that describe the service arrangement and/or identify
the supported features, functions and supported throughput rates.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's 1st Request for Production, No. 1 in NCUC Dkt No. P-
100, Sub 133q.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please provide, on a CLLI-code-specific basis, detailed information
            concerning <u>copper feeder</u> plant that 1) has been retired since January 1,
            2000 or 2) BellSouth plans to or is considering retiring in the next three
            years.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad,
            unduly burdensome, and oppressive. Subject to this objection, and
            without waiving this objection, BellSouth retires copper feeder facilities
            due to public requirements (e.g. road work or road moves) and non-
            discretionary replacements (e.g. damage to plant caused by storms).

            BellSouth also has a website for disclosure of work associated with the
            above. The *Network Disclosures* will be found at:
            www.interconnection.bellsouth.com/notifications/network

            BellSouth cannot predict, particularly in the situation regarding public
            requirements, where or when copper plant will be retired because
            BellSouth does not know of the Kentucky Department of Transportation's
            plans except when advised.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it is overly broad,
            unduly burdensome, and oppressive. Subject to this objection, and
            without waiving this objection, BellSouth understands that this request
            addresses the re-allocation of copper feeder pairs that have been replaced
            with fiber-feeder, to cross boxes closer to central offices. Standard
            planning procedures, as outlined in the Loop Technology Deployment
            Directives ("LTDD"), consider the use of copper close in for
            reinforcement to meet growth needs. The information responsive to this
            request is proprietary and is in MCI's possession, custody, or control as it
            was provided by BellSouth in response to MCI's 1st Request for
            Production, No. 1 in NCUC Dkt. No. P-100, Sub 133q.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please provide a detailed description of BellSouth's current policy
regarding maintenance of copper outside plant facilities once those
facilities have been retired. Please identify for disclosure all documents,
including Methods and Procedures, guidelines, bulletins, business rules
and/or business analysis on which you relied, or that are relevant to this
Request. Also please state whether BellSouth is considering revising this
policy, and if so, when such revision is anticipated.

RESPONSE: Once BellSouth facilities are retired there is no maintenance of these
facilities. Aerial and underground cables are removed for salvage and
buried cables are abandoned in place where allowed, or removed from the
ground where required. Any buried pedestals are removed and the cables
cut off below the ground. Retired plant is assumed to be non-usable
without any worth so BellSouth does not maintain any of the abandoned
plant. BellSouth has no immediate plans to change or revise this policy.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please identify for disclosure detailed information, including supporting
and related documents, regarding BellSouth's plans, incentives,
justification, benefits and/or analysis of upgrading its loop plant in
Kentucky by installing additional 1) hybrid copper/fiber loops; 2) all-fiber
loops.

RESPONSE: Each BellSouth Outside Plant District analyzes and develops plans for
facility relief and upgrading its loop plant using the Loop Technology
Deployment Directives ("LTDD"), which is referenced in Item No. 126.

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: Please provide, on a wire center basis, detailed information concerning <u>dark fiber</u> in the loop plant that is currently available for use by CLECs.

RESPONSE: BellSouth objects to the Interrogatory on the grounds that information concerning dark fiber in the loop plant is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, which concerns switching.

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REQUEST: 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).

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail services is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory on grounds that it is overly broad, unduly burdensome, and oppressive.

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REQUEST: Please state whether collocation rates, terms and conditions in BellSouth's service territory in Kentucky are controlled by tariff, interconnection agreements, documents controlled by BellSouth (e.g., CLEC handbook) or a combination of these documents. Please identify for disclosure each such document (including attachments or amendments). .

RESPONSE: Collocation rates, terms and conditions in BellSouth's service territory in Kentucky are controlled by either BellSouth's Standard Interconnection Agreement for Collocation (Attachment 4), a BellSouth and Carrier-Specific Negotiated Interconnection Agreement (that includes Collocation in Attachment 4), or the Kentucky Statement of Generally Available Terms and Conditions ("SGAT"). All of the rates, terms and conditions associated with BellSouth's Standard Interconnection Agreement, which includes BellSouth's Collocation Offering (Attachment 4), can be found at the following BellSouth website:

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

Copies of BellSouth's executed collocation agreements with Specific Carriers, which contain the negotiated collocation rates, terms and conditions, are posted on the following BellSouth website:

http://cpr.bellsouth.com/clec/docs/all_states/index7.htm

The current BellSouth SGAT for Kentucky, which contains the rates, terms and conditions for Collocation under Attachment 4, is on file with the Kentucky Public Service Commission.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: With respect to 190, if the collocation rates, terms and/or conditions vary among interconnection agreements, please provide a copy of each different collocation section.

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information that is in the public record or otherwise publicly available. Subject to this objection, and without waiving this objection, copies of BellSouth's executed interconnection and collocation agreements with CLECs are posted on the following BellSouth website: http://cpr.bellsouth.com/clec/docs/all_states/index7.htm.   Collocation rates, terms and conditions can be found in the CLEC-specific collocation attachments included on this web site.

           Additionally, collocation terms, conditions and rates can be found in Attachment 4 of BellSouth's Standard Interconnection Agreement, which is located at the following BellSouth website: http://www.interconnection.bellsouth.com/become_a_clec/html/ics_agreement.html.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: With respect to 190, please state whether BellSouth is considering changing the type of document that controls collocation rates, terms and conditions (e.g. using tariffs instead of interconnection agreements). If BellSouth is considering such change, please provide all documents that address such change.

RESPONSE: No.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: Please list and describe all types of physical collocation offered by BellSouth in Kentucky.

RESPONSE: Physical collocation is an arrangement for the placement of carrier-owned facilities and equipment in BellSouth central offices and may include any type of equipment that is necessary for interconnection to BellSouth's network or access to unbundled network elements in the provision of telecommunications services.

In Kentucky, BellSouth's offers the following types of physical collocation:

Cageless collocation – Cageless collocation enables a carrier to place its equipment and facilities within a BellSouth central office, without requiring the construction of a cage or similar structure, and have direct access to its equipment and facilities. BellSouth makes cageless collocation available in single bay increments. Except where the carrier's equipment requires special technical considerations (e.g., special cable racking, isolated ground plane), BellSouth will locate cageless arrangements in conventional equipment rack lineups where technically feasible on a space-available basis. If the carrier's equipment requires special technical considerations, the carrier must provide the equipment layout, including spatial dimensions, and will be responsible for constructing all special technical requirements associated with such equipment. A BellSouth Certified Supplier must be used to perform all engineering and installation work required in the collocation space.

Caged collocation – Caged collocation is the enclosure of a carrier's equipment and facilities in compliance with the carrier's collocation request. BellSouth will permit a carrier, at its sole expense, to arrange with a BellSouth Certified Supplier to construct a collocation arrangement enclosure in accordance with BellSouth's guidelines and specifications prior to starting equipment installation. BellSouth makes caged collocation available in increments small enough to collocate a single rack, or bay, of equipment.

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RESPONSE (Cont'd.):

Shared caged collocation - In a shared caged collocation arrangement, a carrier may allow other carriers to share its caged collocation arrangement pursuant to terms and conditions agreed to by the carrier ("Host") and the other carriers ("Guests"), except where the BellSouth central office is located within a leased space and BellSouth is prohibited by the lease from offering such an option. The Host must indemnify and hold harmless BellSouth from any and all claims, actions, causes of actions, of whatever kind or nature arising out of the presence of the Guests in the Collocation Space. Furthermore, the carriers' sharing agreement must contain a certification that incorporates by reference the terms and conditions of the Interconnection Agreement between BellSouth and the Host.

Adjacent collocation space - Where physical collocation space is legitimately exhausted in a particular BellSouth central office, a carrier will be permitted to locate its equipment in an adjacent controlled environmental vault or similar structure located on BellSouth's premises (e.g., land owned, controlled or leased where the lessor does not prohibit such activity) subject to technical feasibility. The adjacent arrangement cannot interfere with access to existing or planned structures or facilities on the BellSouth premises and must be permitted by zoning and other applicable state and local regulations. The carrier must arrange with a BellSouth Certified Supplier to construct an adjacent arrangement structure in accordance with BellSouth's guidelines and specifications. The filing and receipt of any required zoning, permits and/or licenses for construction of the adjacent arrangement is the responsibility of the carrier and its BellSouth Certified Supplier. The carrier must provide a concrete pad, the structure housing the arrangement, heating/ventilation/air conditioning, lighting, and all facilities that connect the structure (e.g., racking and conduits) to the BellSouth point of demarcation. As with caged collocation, and under similar terms and conditions, a carrier may allow other carriers to share its adjacent collocation arrangement.

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RESPONSE (Cont'd.):

Remote site collocation - BellSouth will grant a carrier the right to occupy a certain area designated by BellSouth within a BellSouth Remote Site Location, of a size that is specified by the carrier and agreed to by BellSouth. BellSouth Remote Site Locations include cabinets, huts, and controlled environmental vaults owned or leased by BellSouth that house BellSouth network facilities.

Microwave collocation - Where technically feasible and space is available, BellSouth will provide for physical collocation of microwave equipment on the roofs of BellSouth's central office buildings. Microwave collocation includes placements of supporting masts, non-penetrating roof mounts, penetrating pipe stands, parapet mounts and microwave antenna(e) on the rooftop or other suitable exterior spaces of BellSouth's central offices, excluding towers.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: Please provide the non-recurring (including EF&I charges) and monthly recurring charges that BellSouth charges for all elements of all types of collocation.

RESPONSE: BellSouth objects to this Interrogatory to the extent it seeks information that is in the public record or otherwise publicly available. Subject to this objection, and without waiving this objection, all of the rates, terms and conditions associated with BellSouth's Standard Interconnection Agreement, which includes BellSouth's Collocation Offering (Attachment 4), can be found at the following BellSouth website: http://www.interconnection.bellsouth.com/become_a_clec/html/ics_agreement.html

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: Please list and describe all restrictions on the types and/or quantities of
equipment or facilities that may be placed in BellSouth collocation space
in Kentucky. For each such restriction, please provide the rationale for the
restriction and the basis for the restriction (e.g. ILEC business decision,
FCC order, Kentucky Public Service Commission order, etc.).

RESPONSE: BellSouth does not have a specified list of equipment or facilities that is
restricted from collocation, nor does BellSouth have any restrictions on
the quantity of equipment or facilities that may be collocated in Kentucky.
BellSouth complies with Title 47 of the FCC's Code of Federal
Regulations, Sections 51.323 (b) and (c), which describe the restrictions
that Incumbent Local Exchange Carriers ("ILECs") may place on
equipment that Competitive Local Exchange Carriers ("CLECs") seek to
collocate. These rules were initially created and have evolved pursuant to
various orders issued by the FCC in CC Docket No. 98-147, *In the Matter
of Deployment of Wireline Services Offering Advanced Telecommunications
Capability*.

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

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: With respect to MCI-195, please identify for disclosure all documents that support or address the restriction or the basis for the restriction.

RESPONSE: See BellSouth's Response to MCI First Set of Interrogatories Item No. 136.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: On an individual wire center basis, please provide the following for
BellSouth in Kentucky:

a) total collocation space (used and unused space stated in square feet) for
each type of collocation you offer;
b) total collocation space currently occupied by carriers (in square feet; for
caged collocation, state the number of cages);
c) names of carriers currently occupying collocation space;
d) collocation space (stated in square feet) held by carriers who are
currently in bankruptcy proceedings;
e) collocation space (stated in square feet) occupied by CLECs no longer
operating;
f) total unoccupied collocation space (stated in square feet) available for
carriers; and
g) total non-collocation space available or suitable for conversion to
collocation space.

RESPONSE: a)   See BellSouth's Response to Item No. 106.

b)   The total collocation space currently occupied by carriers (in square
feet) in each BellSouth wire center does not exist in the requested
format contained in BellSouth's records. Furthermore, this request is
unduly burdensome and would be excessively time consuming for
BellSouth to compile. However, the approximate square footage of
collocation floor space for each wire center in Kentucky in which there
are currently collocators is available at the following URL:

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

The file name is GA_INTER_ATTACH_40.zip.

BellSouth designates individual 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

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RESPONSE (Cont'd.):

BellSouth cannot identify the number of caged collocation arrangements currently occupied by carriers on a wire center basis. This request is unduly burdensome and would be excessively time consuming for BellSouth to compile. However, BellSouth can provide the number of caged collocation spaces in-service in the state of Kentucky as of December 31, 2002. This number was 81.

c) BellSouth is unable to provide this information because the names of specific collocating carriers in each individual wire center is proprietary, competitive marketing information that is protected by the FCC's Customer Proprietary Network Information rules and cannot be shared with other carriers. The names of carriers are not relevant to this proceeding.

d) BellSouth has determined that collocation space (in square feet) held by carriers who are currently in Chapter 7 bankruptcy proceedings is not contained in BellSouth's electronic records. Furthermore, this request is unduly burdensome and would be excessively time consuming for BellSouth to compile. However, BellSouth has provided, by wire center, the number and type of collocation spaces in Kentucky still assigned to carriers who are no longer in business, including those that are currently in Chapter 7 bankruptcy proceedings. This information is available at the following URL:

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

The file name is GA_INTER_ATTACH_40.zip.

BellSouth is currently in the process of reclaiming space that contains the equipment/facilities of carriers that have abandoned or terminated their collocation space. In addition, BellSouth has begun the process of reclaiming space for those carriers that have completed the bankruptcy process and are no longer operating as viable entities. Upon a carrier's abandonment, termination or Chapter 7 bankruptcy filing, BellSouth immediately reclaims any vacant collocation space.

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RESPONSE (Cont'd.):

If the carrier abandons or terminates its collocation space and leaves its equipment/facilities in the space, then BellSouth's reclamation process requires that the owner of the equipment/facilities (which may be a finance company, instead of the actual collocator) be contacted by BellSouth for disposition of the equipment/facilities. If the carrier files for Chapter 7 bankruptcy protection, then BellSouth must petition the bankruptcy court and request direction regarding the disposition of the equipment/facilities in the collocation space. As soon as the equipment/facilities have been removed from BellSouth's premises by the owner of the equipment or pursuant to the requirements of the bankruptcy court, BellSouth will proceed with its reclamation of the collocation space. If collocation space is needed in a BellSouth wire center in which there is space still held by a carrier that is no longer in business, then BellSouth will take whatever steps are needed to immediately make this space available for use by the requesting carrier for collocation purposes. BellSouth will not deny collocation space to a requesting carrier in an office in which there is space still assigned to a carrier that is no longer in business.

e) BellSouth has determined that collocation space (in square feet) occupied by CLECs no longer operating as viable entities is not contained in BellSouth's electronic records. Furthermore, this request is unduly burdensome and would be excessively time consuming for BellSouth to compile. However, BellSouth has provided by wire center, the number and type of collocation spaces in Kentucky still assigned to carriers who are no longer in business.

This information is available at the following URL:

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

The file name is GA_INTER_ATTACH_40.zip.

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RESPONSE (Cont'd.):

f)   See BellSouth's Response to Item No. 106.

BellSouth complies with Title 47 of the FCC's Code of Federal
Regulations, Section 51.323, which requires that BellSouth make
space available within or on its premises to requesting
telecommunications carriers on a first-come, first-served basis. If
physical collocation space is unavailable in a given wire center,
BellSouth will relinquish any space held for future use before denying
a request for virtual collocation on the grounds of space limitations,
unless BellSouth proves to the Kentucky Public Service Commission
that virtual collocation is not technically feasible. Currently,
BellSouth has collocation space available in all of its individual wire
centers in Kentucky.

(g) See BellSouth's Response to Item No. 106.
The total non-collocation space available or suitable for conversion to
collocation in each Kentucky wire center is not contained anywhere in
BellSouth's records. Therefore, this request is unduly burdensome and
would be excessively time consuming for BellSouth to compile. As
information, BellSouth will utilize any unused space and remove any
obsolete equipment to make additional space available in a given
Kentucky wire center if space for collocation is needed. If all unused
space and obsolete equipment space has been utilized and there is no
physical collocation space available in a given wire center, BellSouth
will relinquish any space held for future use to provide the carrier with
virtual collocation. BellSouth will never deny a request for virtual
collocation on the grounds of space limitations, unless BellSouth
proves to the Kentucky Public Services Commission that virtual
collocation is not technically feasible.

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: For cross-connects between CLEC collocation arrangements in your central offices in Kentucky, please provide:

(a) your Methods and Procedures, guidelines, and practices relevant to, or describing cross-connects between CLEC collocation arrangements;
(b) non-recurring charges;
(c) monthly recurring charges;
(d) applicable performance measures and penalties;
(e) complaints from CLECs regarding any aspect of such cross-connects (e.g., cost, timeliness, etc.);
(f) your response to and resolution of any such complaints.

RESPONSE: (a) The primary purpose of collocation is for a telecommunications carrier to interconnect with BellSouth's network or to access BellSouth's unbundled network elements for the provision of telecommunications services. BellSouth will permit a carrier to interconnect between its virtual or physical collocation arrangement(s) and that (those) of another collocated telecommunications carrier within the same "BellSouth Premises". Both the ordering carrier's agreement and the other collocated telecommunications carrier's agreement must contain the Co-Carrier Cross Connect ("CCXC") rates, terms and conditions before BellSouth will permit the provisioning of CCXCs between the two collocated carriers. The carrier is prohibited from using the Collocation Space for the sole or primary purpose of cross-connecting to other collocated telecommunications carriers.

A carrier must contract with a BellSouth Certified Supplier to place the CCXC. The CCXC shall be provisioned using facilities owned by the ordering carrier. Such cross-connections to other collocated telecommunications carriers may be made using either electrical or optical facilities. The ordering carrier will be responsible for providing a letter of authorization ("LOA"), with the application, to BellSouth from the other collocated telecommunications carrier to which it will be cross-connecting. The carrier-provisioned CCXC shall utilize BellSouth common cable support structure. There will be a recurring charge per linear foot, per cable, of common cable support structure used by the carrier to provision the CCXC to the other collocated telecommunications carrier. In those instances where the

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RESPONSE (Cont'd.):

ordering carrier's equipment and the equipment of the other collocated telecommunications carrier are located in contiguous caged Collocation Space, the ordering carrier may use its own technicians to install co-carrier cross connects using either electrical or optical facilities between the equipment of both collocated telecommunications carriers by constructing a dedicated cable support structure between the two contiguous cages. The ordering carrier must deploy such electrical or optical cross-connections directly between its own facilities and the facilities of another collocated telecommunications carrier without being routed through BellSouth's equipment. The ordering carrier may not provision CCXC on any BellSouth distribution frame, POT (Point of Termination) Bay, DSX (Digital System Cross-Connect) or LGX (Light Guide Cross-Connect). The ordering carrier is responsible for ensuring the integrity of the signal.

To place an order for CCXCs, the ordering carrier must submit an Initial Application or Subsequent Application to BellSouth. If no modification to the Collocation Space were requested other than the placement of CCXCs, the Subsequent Application Fee for CCXCs would apply. If other modifications, in addition to the placement of CCXCs, are requested, either an Initial Application or Subsequent Application Fee will apply, pursuant to ordering carrier's interconnection agreement. BellSouth will bill this nonrecurring fee on the date that it provides an Application Response to the ordering carrier.

All of the rates, terms and conditions associated with BellSouth's Standard Interconnection Agreement, which includes BellSouth's CCXC offering (in Attachment 4 for Collocation), can be found at the following BellSouth website:

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

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RESPONSE (Cont'd.):

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

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

(d)   BellSouth's responsibility is to provide common cable support structure to the ordering carrier. The ordering carrier's application will be captured by the collocation measurements C-1, Collocation Average Response Time, C-2, Collocation Average Arrangement Time, and C-3, Collocation Percent of Due Dates Missed. Measurement C-3 is a part of the SEEM penalty plan. There are no performance measurements for the placement of the cabling and the installation of the cross connects since both are the responsibility of the ordering carrier.

(e)   BellSouth is unaware of any complaints from CLECs regarding any aspect of their provisioning of co-carrier cross connects in BellSouth's central offices in Kentucky. See BellSouth's Response to Item No. 107.

(f)   Not Applicable

RESPONSE PROVIDED BY: Wayne Gray

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REQUEST: 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 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.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it seeks
information that is in the public record or is otherwise publicly available.
Subject to this objection, and without waiving this objection, the requested
information is publicly available and can be obtained from BellSouth's
Kentucky General Subscriber Services Tariff.

RESPONSE PROVIDED BY: Kathy Blake

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail customers is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning universal service fund subsidies received by BellSouth is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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REQUEST: 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) provide all cost studies, calculations, and other materials that directly support your contention that the service is implicitly and/or explicitly being subsidized.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning universal service fund subsidies received by BellSouth is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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REQUEST: With respect to each of the two customer categories identified in response to 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).

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail costs and revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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REQUEST: For each type of digital loop carrier ("DLC") equipment deployed by BellSouth, please state the minimum and maximum configuration deployed in Kentucky, in terms of number of lines supported.

RESPONSE: Configurations for currently approved NGDLC systems deployed in a non-controlled environment are as follows:
- DISC*S Metallic distribution = 384 lines min./2,016 maximum
- DISC*S FITL-A distribution = 480 lines min./2,016 maximum
- DISC*S MX FITL distribution = 864 lines (hybrid metal/fitl) min./ 3,360 maximum
- Litespan 2000 distribution = 448 lines min./1,904 maximum

Additional DLC equipment as follows:
- DS1Urban - 544 line minimum and maximum
- FDLC - 384 line minimum/1152 maximum
- SLC96 - 96 line minimum/384 maximum
- SLC5 - 192 line minimum/1344 maximum
- PGFlex - 6 line minimum/24 maximum
- GoDigital - 8 line minimum and maximum

RESPONSE PROVIDED BY: W. Keith Milner

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning BellSouth's DLC costs is not reasonably calculated to lead to
the discovery of admissible evidence and is not relevant to the subject
matter of this action.

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
            concerning BellSouth's DLC costs is not reasonably calculated to lead to
            the discovery of admissible evidence and is not relevant to the subject
            matter of this action.

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REQUEST: 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").

RESPONSE: BellSouth objects to this Interrogatory on grounds that information
concerning loop rates is not reasonably calculated to lead to the discovery
of admissible evidence and is not relevant to the subject matter of this
action, which concerns switching. BellSouth further objects to this
Interrogatory to the extent it seeks information that is in the public record
or is otherwise publicly available.

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REQUEST: 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").

RESPONSE: BellSouth objects to this Interrogatory on grounds that information concerning transport rates is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, which concerns switching. BellSouth further objects to this Interrogatory to the extent it seeks information that is in the public record or is otherwise publicly available.

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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is unduly
             burdensome, overly broad, and oppressive as written. Subject to this
             objection, and without waiving this objection, this information is already
             in MCI's possession, custody, or control as it was provided by BellSouth
             in response to MCI's First Request for Production of Documents, Item No.
             1, in NCUC Dkt No. P-100, Sub 133q.   Additional information responsive
             to this request will be provided in connection with the testimony filed in
             this docket.

RESPONSE PROVIDED BY: Kathy Blake

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REQUEST: Please state whether you have deployed facilities of any type (e.g. switches, loops, transport, DLC, DSLAMs, splitters, etc.) to provide local services as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

(a) all states, cities or other geographic area in which you have deployed facilities;
(b) a detailed description of the facilities for each geographic region;
(c) a detailed description of the criteria you used to choose the geographic areas in which you would deploy facilities;
(d) a copy of all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
(e) the date on which you first began providing competitive local services using your own facilities in each state, city or other geographic region outside your ILEC serving territory;
(f) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
(g) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory (including the recurring and non-recurring charges for the switch, software, installation, maintenance, loops, collocation, transmission/concentration equipment, transport, hot cuts, OSS, signaling, etc.);
(h) the average total monthly revenues earned per customer for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA, MSA;
(i) the source of all revenues derived from each customer type identified in your response to subpart (h) 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).

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RESPONSE: See BellSouth's response to MCI/WorldCom's First Set of Interrogatories,
Item No. 154 filed in TN Docket No. 03-000491 on November 24, 2003.

RESPONSE PROVIDED BY: Kathy Blake

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REQUEST: Please state whether you have ever offered, or are currently offering, local services via UNE-P as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

(a) all states, cities or other geographic area in which you have, or are, offering local services;
(b) a detailed description of the criteria you used to choose the geographic areas in which you would offer local services;
(c) a copy of all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
(d) the date on which you first began providing competitive local services using UNE-P in each state, city or other geographic region outside your ILEC serving territory;
(e) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
(f) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory;
(g) the average total monthly revenues earned per customer for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA and MSA;
(h) the source of all revenues derived from each customer type identified in subpart (g) 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).

RESPONSE: No.

RESPONSE PROVIDED BY: Kathy Blake

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REQUEST: Please state whether you have ever offered, or are currently offering, local services via resale as a CLEC in any state or other geographic area outside your ILEC serving territory. If so, please provide all of the following:

(a) all states, cities or other geographic area in which you have, or are, offering local services;
(b) a detailed description of the criteria you used to choose the geographic areas in which you would offer local services;
(c) a copy of all business cases, business analysis, cost studies, or other analyses or evaluations (whether created by you or on your behalf) regarding competitive entry into the geographic area outside your ILEC serving territory;
(d) the date on which you first began providing competitive local services using resale in each state, city or other geographic region outside your ILEC serving territory;
(e) the number of 1) residential and 2) business customers at the most granular level for which data has been retained (e.g., ILEC wire center, city, state, etc.) for your operations outside your ILEC serving territory for each month since such operations began;
(f) all categories and amounts of costs arising from providing competitive local services in each state, city or other geographic region outside your ILEC serving territory;
(g) the average total monthly revenues earned per customer for each customer type (e.g., residential, small business, enterprise) served in each state, city or other geographic region outside your ILEC serving territory, reported by CLLI, LATA, and MSA;
(h) the source of all revenues derived from each customer type identified in subpart (g) 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).

RESPONSE: No.

RESPONSE PROVIDED BY: Kathy Blake

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: Please provide all documents addressing BellSouth <u>currently offered</u>
            <u>bundles</u> 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
            concerning BellSouth's retail offerings is not reasonably calculated to lead
            to the discovery of admissible evidence and it is not relevant to the subject
            matter of this action. BellSouth also objects to the Interrogatory to the
            extent it seeks information that is in the public record or is otherwise
            publicly available.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: Please provide all documents addressing BellSouth <u>planned bundling</u> 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning BellSouth's retail offerings is not reasonably calculated to lead
to the discovery of admissible evidence and it is not relevant to the subject
matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: On a CLLI-code-specific basis in Kentucky, please provide all forecasts of BellSouth's expected, estimated or forecasted demand growth or decline for each of the next five years for circuit switched voice grade services, stated on all available bases (e.g., number of lines, minutes of use, processor utilization CCS, etc.). 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Request for Production, No. 1 (Bates Range BST001897-BST001917) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: W. Keith Milner

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
November 24, 2003
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REQUEST: On a CLLI-code-specific basis in Kentucky, please provide BellSouth's
current capacity utilization for each Class 5 circuit switch for the major
switch components (e.g, processor, line cards, trunk cards, etc.). 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's 1st Request for Production, No. 1 (Bates Range
BST001918-BST001940) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: W. Keith Milner

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: On a CLLI-code-specific basis in Kentucky, please provide the BellSouth's demand growth or decline for circuit switched voice grade services for each of the last three years, stated on all available bases (e.g., number of lines, minutes of use, processor utilization CCS, etc.). 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Request for Production, No. 1(Bates Range BST001941-BST001980)

 in AL Dkt No. 29054.

RESPONSE PROVIDED BY: W. Keith Milner

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: 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:

a) primary business voice lines;
b) primary residential voice lines;
c) additional business voice lines;
d) additional residential voice lines;
e) standalone DSL lines;
f) BellSouth DSL service provisioned in the high frequency portion of a
loop that also supports BellSouth narrowband analog voice service;
g) CLEC DSL service provisioned in the high frequency portion of a loop
that also supports BellSouth narrowband analog voice service;
h) 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information
concerning BellSouth's retail offerings is not reasonably calculated to lead
to the discovery of admissible evidence and it is not relevant to the subject
matter of this action. Subject to this objection, and without waiving this
objection, see BellSouth's response to MCI First Set of Interrogatories
Item No. 120 for information responsive to Interrogatory 162(h).

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: 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:

a) primary business voice lines;
b) primary residential voice lines;
c) additional business voice lines;
d) additional residential voice lines;
e) standalone DSL lines;
f) BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service;
g) CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service;
h) 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail offerings is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's response to MCI First Set of Interrogatories Item No. 166 for information responsive to Interrogatory 163(h).

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: 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:

a) primary business voice lines;
b) primary residential voice lines;
c) additional business voice lines;
d) additional residential voice lines;
e) standalone DSL lines;
f) BellSouth DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service;
g) CLEC DSL service provisioned in the high frequency portion of a loop that also supports BellSouth narrowband analog voice service;
h) 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.

RESPONSE: BellSouth objects to this Interrogatory on grounds that information concerning BellSouth's retail services is not reasonably calculated to lead to the discovery of admissible evidence and it is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, see BellSouth's response to MCI First Set of Interrogatories Item No. 167 for information responsive to Interrogatory 164(h).

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: 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:

            a) UNE loops used for circuit switched voice service,
             b) UNE loops used for DSL service (including line split configurations),
            c) UNE-P residential local exchange service,
            d) UNE-P business local exchange service,
            e) resold ILEC business local exchange service and f) resold ILEC
            residential local exchange 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
            possession, custody, or control as it was provided by BellSouth in
            response to MCI's 1st Request for Production, No. 1(Bates Range
            BST001981-BST002009) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: Craig Williard

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: On a CLLI-code-specific basis in Kentucky, please provide the
BellSouth's <u>current</u> in-service quantities for each of the following:

 a) UNE loops used for circuit switched voice service,
 b) UNE loops used for DSL service (including line split configurations),
c) UNE-P residential local exchange service,
 d) UNE-P business local exchange service,
e) resold ILEC business local exchange service and f) resold ILEC
residential local exchange 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's 1st Request for Production, No. 1 (Bates Range
BST002010-BST002042) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: Craig Williard

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: On a CLLI-code-specific basis in Kentucky, please provide the BellSouth's expected, estimated or forecasted demand growth or decline for each of the <u>next three years</u> for each of the following:

 a) UNE loops used for circuit switched voice service,
b) UNE loops used for DSL service (including line split configurations),
c) UNE-P residential local exchange service,
d) UNE-P business local exchange service,
e) resold ILEC business local exchange service and
 f) resold ILEC residential local exchange 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.

RESPONSE: The information responsive to this request is proprietary and is in MCI's possession, custody, or control as it was provided by BellSouth in response to MCI's 1st Set of Interrogatories, Item No. 167 in NCUC Dkt No. P-100, Sub 133q.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please provide all calculations and/or estimates in BellSouth's custody or control of the market demand elasticity for <u>local exchange service</u>, stated separately for residential and business customers, if such separate calculations and/or estimates exist. Please provide all supporting documentation for such calculations and/or estimates.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information requested it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: Please provide all calculations and/or estimates in BellSouth's custody or
control of the market demand elasticity for <u>long distance service</u>, stated
separately for residential and business customers, if such separate
calculations and/or estimates exist. Please provide all supporting
documentation for such calculations and/or estimates.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: Please provide all calculations and/or estimates in BellSouth's custody or
control of the market demand elasticity for <u>broadband service</u> (i.e., DSL),
stated separately for residential and business customers, if such separate
calculations and/or estimates exist. Please provide all supporting
documentation for such calculations and/or estimates.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please provide all calculations and/or estimates in BellSouth's custody or
control of the market demand elasticity for <u>bundled local and long
distance service</u>, stated separately for residential and business customers,
if such separate calculations and/or estimates exist. Please provide all
supporting documentation for such calculations and/or estimates.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: 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 provide all supporting documentation for such calculations and/or estimates.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please define the following terms, as BellSouth understands and uses them, and distinguish each defined term from all of the others on this list:
a) variable cost
b) sunk cost
c) marginal cost
d) incremental cost
e) TSLRIC
f) TELRIC.

RESPONSE: a) Variable cost is a cost that changes as the level of activity of a firm changes, or that changes as the level of output of a product changes. In long run cost analyses, all costs are considered variable (i.e., there are no fixed costs in the long run).

b) Sunk cost is any historical cost resulting from past decisions.

c) Marginal cost is the additional cost of one more unit of output holding the production levels of all other goods and services produced by an enterprise constant.

d) Incremental cost is any increment to (change in) cost due to a specified action.

e) TSLRIC (Total Service Long Run Incremental Cost) studies address not only the volume sensitive costs of a service but also consider the directly attributable volume insensitive costs of the service. Such studies are used to ensure that the service under consideration is not being subsidized.

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RESPONSE: (Continued)

    f) TELRIC (Total Element Long Run Incremental Cost) - As recognized by the FCC, TELRIC methodology is very similar to TSLRIC methodology: "we are adopting a version of the methodology commonly referred to as TSLRIC as the basis for pricing interconnection and unbundled elements..." (Paragraph 678, First Report and Order). One point of distinction is that TSLRIC methodology is used to determine the cost of a service whereas the TELRIC methodology is used in determining the cost of a network element. Another difference is the inclusion of shared costs. These costs are excluded in a TSLRIC study. However, the FCC recognized that certain shared costs that would be excluded in a TSLRIC analysis are appropriate in a TELRIC study. A common cost allocation factor is also applied in a TELRIC analysis to yield economic cost.

RESPONSE PROVIDED BY: Daonne Caldwell
                                      Director
                                      675 West Peachtree Street
                                      Atlanta, Georgia 30375

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail costs is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE: BellSouth objects to this request for the reasons stated in General
Objection No. 4 previously filed in this proceeding. Nevertheless and not
withstanding this objection, BellSouth does not have a current filed local
exchange service cost study for Kentucky and such studies, if available,
would not compute marginal costs.

RESPONSE PROVIDED BY: Daonne Caldwell
                                   Director
                                   675 West Peachtree Street
                                   Atlanta, Georgia 30375

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.
BellSouth also objects to this Interrogatory to the extent it seeks to impose
an obligation on BellSouth to respond on behalf of its affiliates on grounds
that such discovery is overly broad, unduly burdensome, oppressive, and
not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.
BellSouth also objects to this Interrogatory to the extent it seeks to impose
an obligation on BellSouth to respond on behalf of its affiliates on grounds
that such discovery is overly broad, unduly burdensome, oppressive, and
not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>variable</u> costs
for providing <u>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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>marginal</u> costs for providing <u>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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>variable</u> costs
for providing <u>bundled local exchange and 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.
BellSouth also objects to this Interrogatory to the extent it seeks to impose
an obligation on BellSouth to respond on behalf of its affiliates on grounds
that such discovery is overly broad, unduly burdensome, oppressive, and
not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>marginal</u> costs for providing <u>bundled local exchange and 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..

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory to the extent it seeks to impose an obligation on BellSouth to respond on behalf of its affiliates on grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>variable</u> 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
            requested is not reasonably calculated to lead to the discovery of
            admissible evidence and is not relevant to the subject matter of this action.
            BellSouth also objects to this Interrogatory to the extent it seeks to impose
            an obligation on BellSouth to respond on behalf of its affiliates on grounds
            that such discovery is overly broad, unduly burdensome, oppressive, and
            not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: Please provide BellSouth's calculation and/or estimate of its <u>marginal</u>
            costs for providing <u>bundled local exchange, long distance and broadband</u>
            <u>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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
            requested is not reasonably calculated to lead to the discovery of
            admissible evidence and is not relevant to the subject matter of this action.
            BellSouth also objects to this Interrogatory to the extent it seeks to impose
            an obligation on BellSouth to respond on behalf of its affiliates on grounds
            that such discovery is overly broad, unduly burdensome, oppressive, and
            not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: 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 service is affirmative, please provide the full name of the affiliate or subsidary and a list of the service(s) provided by the affiliate or subsidiary.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory to the extent it seeks to impose an obligation on BellSouth to respond on behalf of its affiliates on grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

BellSouth Telecommunications, Inc.
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth also objects to this Interrogatory to the extent it seeks information that is in the public record is otherwise publicly available.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: With respect to each contract requested in 186, 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
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REQUEST: 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
KY Dkt No. 2003-00379
MCI's 2nd Set of Data Requests
November 24, 2003
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REQUEST: With respect to the cost of capital calculations or estimates requested in
MCI-88, 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.

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REQUEST: Please describe in detail the approach and manner in which BellSouth
segments its sales and marketing efforts and personnel on the basis of
customer size, type (e.g., residential, small business, medium business,
large business), monthly level of revenues, and/or service(s) taken by
customer (individually or as part of a bundle), and provide the basis on
which such segmentation is made.

RESPONSE: Generally, "Large Business" customers are businesses that bill $35K or
more annually in core network services. Anything below that level is
considered a Small Business Customer. Large Business customers are
divided into three Market Segments: General Business, Major and
Enterprise. There are not strict definitions of these segments but the
segments generally depend on such factors as revenue; number of
employees; locations; type of services ordered; type of industry; and
number of lines. Typically an enterprise customer bills over $1 million
annually, a Major customer bills between $250,000 and $1million
annually and a General Business customer bills between $35,000 and
$250,000 annually.

Within the Small Business segment, customers are divided into two
market segments based on those who spend less than $3,000 annually are
considered Mass Market and those spending more than $3,000 annually
are considered Mid Market. At this time, no factor outside of annual
spend is considered in this segmentation.

Generally, residential customers are segmented based upon value (i.e.
current spend and/or future spend) and vulnerability to competitive loss.

RESPONSE PROVIDED BY: Susan Callaghan

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REQUEST: Please describe in detail any legal, regulatory or other constraints on
            BellSouth's ability to target price reductions 1) 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
            requested is not reasonably calculated to lead to the discovery of
            admissible evidence and is not relevant to the subject matter of this action.
            BellSouth also objects to this Interrogatory to the extent it seeks
            information that is in the public record is otherwise publicly available.

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REQUEST: 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,
) long distance service and
) 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.).

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information
requested is not reasonably calculated to lead to the discovery of
admissible evidence and is not relevant to the subject matter of this action.
BellSouth also objects to this Interrogatory to the extent it seeks
information that is in the public record is otherwise publicly available.

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REQUEST: Please provide average total revenue for each BellSouth wire center in Kentucky.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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REQUEST: For each CLLI code in Kentucky, please provide for the most recent
period available:

a) the data specified in Table II and Table III of FCC ARMIS Report 43-
08;
b) the number of switched DS-1 lines/loops in service;
c) the number of non-switched DS-1 lines/loops in service; and
d) the number of DS-3 lines/loops in service.

RESPONSE: The information responsive to this request is proprietary and is in MCI's
possession, custody, or control as it was provided by BellSouth in
response to MCI's 1st Request for Production, Item No. 1(Bates Range
BST002043-BST002115) in AL Dkt No. 29054.

RESPONSE PROVIDED BY: Paul Grace
Kathy Fannon

BellSouth Telecommunications, Inc.
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REQUEST: 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-1 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.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that the information requested is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

BellSouth Telecommunications, Inc.
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November 24, 2003
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REQUEST: Please produce all documents that were identified, or that should have
been identified, in response to the preceding Interrogatories.

RESPONSE: The information responsive to this request, some of which is proprietary,
is in MCI's possession, custody, or control as it was provided by
BellSouth in response to MCI's First Request for Production No. 1 in AL
Dkt No. 29054.