

REQUEST: Provide the number and percentage of access lines, by calendar year (for 2000-2003) and by CO (by applicable CLLI code) in BellSouth's nine-state region that serve:

- (a) small business lines; and
- (b) residential lines.

SUPPLEMENTAL RESPONSE:

- (a) On November 20, 2003, AT&T clarified that the term "small business lines" refers to lines that are DS0/2-wire analog loops. With this clarification, BellSouth states that information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 21, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (b) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 21, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

REQUEST: Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth states the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

REQUEST: For the most recent quarter for which information is available, please provide by applicable CLLI code, the total number of retail access lines (voice grade equivalents) (VGEs) provided by BellSouth, as well as the number in each of the following categories:

- (a) residential;
- (b) business;
- (c) Centrex;
- (d) PBX;
- (e) Public; and
- (f) Small business premises with four or more analog switched lines.

SUPPLEMENTAL RESPONSE:

- (a) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (b) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (c) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (d) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U. BellSouth Telecommunications, Inc.

- (e) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (f) BellSouth is unable to gather the information responsive to this request for business customers broken down by number of lines. See BellSouth's response to sub-part (b) for the total number of business access lines.

REQUEST: On a wire center basis, please provide average local revenue per small business line and average local revenue per residential line. Please provide average "take rate" for vertical features.

SUPPLEMENTAL RESPONSE:

See BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22 for the average local revenue per small business and residential line.

BellSouth does not maintain the information requested for vertical features on a wire-center basis. However, in an effort to be responsive, BellSouth states that the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 110, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

REQUEST: Please provide disaggregated revenue data (residential, small business, large business, etc.) specific to the geographies that BellSouth claims are markets for impairment analysis purposes.

SUPPLEMENTAL RESPONSE:

The appropriate markets that should be used to conduct the impairment analysis test are the UNE rate zones previously identified by this Commission, subdivided by Component Economic Areas (CEA) established by the Bureau of Economic Analysis of the Department of Commerce. BellSouth does not maintain disaggregated revenue data for its retail customers based on these markets. However, BellSouth states that the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.