

REQUEST: Provide a copy of BellSouth's Network Centers Force Sizing Model Process and Force Models, and all associated instructions.

SUPPLEMENTAL RESPONSE:

Responsive documents are being provided. See documents titled "FCSTFLOW.ppt", 2004 CWINS Force Models, 2004 LCSC Force Models, for a flow chart of the above-mentioned process. The documents are proprietary and are being provided pursuant to the terms of the parties' protective agreement.

The force model used to determine the filed installation and central office work force required to work the load associated with the UNE-P to UNE-L conversions is proprietary. This information is in AT&T's possession, custody, or control as it was provided by BellSouth in response to AT&T's Second Request for Production, Item No. 35, pursuant to the protective agreement in Florida Public Service Commission Docket No. 030851-TP.

- REQUEST: Provide any and all market surveys conducted or other documents and information reviewed by BellSouth that discuss or address:
- (a) Pricing strategies of competitors offering local switching.
 - (b) Product descriptions of competitors' offerings of local switching for mass-market customers.
 - (c) Demand elasticity for local switching.
 - (d) Demand projections related to the market for local switching.
 - (e) Marketing strategies used by competitors offering local switching to serve mass-market customers.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this request on grounds that it is overly broad and unduly burdensome to the extent that it seeks "documents and information" reviewed by anyone at BellSouth. Subject to this objection, and without waiving this objection, documents responsive to this request are available via the following URL link:

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

The document is titled: GA_17749-U_BST_SUPP_TO_ATT_1_POD.PDF