

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

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

The documents responsive to this request are proprietary and are already in AT&T's possession, custody or control as they were provided by BellSouth in response to AT&T's Second Request for Production of Documents, Item No. 35, pursuant to the protective agreement in Florida Public service Commission Docket No. 030851-TP.