

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S
RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S ADDITIONAL
DISCOVERY TO AT&T

AT&T Communications of the South Central States, LLC (hereinafter "AT&T"), pursuant to the Order Establishing Docket, Procedure and Schedule entered by the Kentucky Public Service Commission (hereinafter "Commission") and Kentucky Rules of Practice and Procedure, hereby submits the following Specific Responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") additional discovery to AT&T, as described herein.

SPECIFIC RESPONSES

Number 1 Please admit that AT&T has deployed high capacity transport facilities to each of the central offices (identified by CLLI code) listed below:

KY AT&T LSVLKYP

Response: AT&T denies that it has deployed, to any of the central offices listed to the extent that any of these facilities meet the FCC's definition of dedicated transport as contained and explained within the TRO (facilities that provide a dedicated route between two ILEC central offices). Additionally AT&T denies that it has

any presence in certain of the central offices listed in the confidential attachment.

The attached Confidential document contains specific responses for each of the central offices in all BellSouth States for which this information has been requested.

Number 2: If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial. .

Response: See AT&T's previously submitted discovery responses.

As used in the attachment, the term "Deny (LD)" is associated with an AT&T network location on AT&T's Long Distance Network rather than AT&T's Local Network.

As used in the attachment, the term "Admit (M1) and Deny (AT&T)" means that the fiber entering that location is owned and used exclusively by Comcast (formerly Media One). AT&T's Local Network collocation at that location is not fiber based.

As used in the attachment, the term "No presence" means that according to its records AT&T does not have an active collocation at the location.

Number 3: Please admit that AT&T can route or transport traffic using AT&T's own facilities between any pair of central offices to which it has deployed high capacity transport facilities. This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as AT&T's switch or the switch of another CLEC.

Response: Denied.

The "transport" at issue in this proceeding is "dedicated transport" which the FCC defines as being "dedicated to a particular customer or carrier." It is not possible to provide transport dedicated to a particular customer or carrier through a switch. Switches are designed and function to connect different customers to each other on an as needed basis.

SBC agrees that dedicated transport does not include switching. In testimony filed before the California Public Utilities Commission on November 20, 2003, Mr. Scott J. Alexander, of SBC, provided the following definition of dedicated transport.

Dedicated transport facilities connect two points within a communications network, so that information can be transmitted between those two points. "Dedicated" transport means all or part of the facility is dedicated to a particular carrier or use and that there is no switching interposed along the transport route.

(Emphasis added – testimony in dockets R. 95-04-043 and I. 95-04-044, November 20, 2003)

AT&T does not have its own facilities "between any pair of central offices" in any portion of BellSouth's nine state territory on either a direct or indirect (through some other central office) basis.

AT&T typically connects its on-net collocations, that is, collocations to which it has constructed fiber facilities to its network (i.e., an entrance facility), using two-point rings, where one point is the collocation and the second is the AT&T network location (e.g., an AT&T switching center or point of presence). Accordingly, it is not possible to provide "dedicated transport" because, even though more than one collocation is on the same cable route, the collocations are not on the same fibers.

AT&T ring construction practices do not provide for multiple incumbent wire centers on the same ring. In the rare instances that multiple incumbent wire centers exist on the same ring, this condition is likely to be the result of (1) acquiring the fiber network of a company that deployed such configurations or (2) sales force error (e.g., sales personnel making commitments based on an erroneous belief that a building was on AT&T's network when it was not). In any event, the presence of multiple incumbent wire centers on the same ring/transmission system is a rare operational exception to AT&T's network engineering practices.

Even though technology may permit a carrier to create a dedicated transport path between two points, the cost of doing so can be substantial, particularly given that the demand between the two endpoints in the incumbent's network will likely be very small. Accordingly, the FCC's trigger analysis properly requires that a "trigger firm" actually be providing service between the identified offices that form a dedicated transport route. As with all facilities construction, a carrier cannot reasonably be expected to incur the costs of providing connections unless it is a rational approach to the serving arrangement and has the prospect to generate revenues sufficient to cover the costs incurred. AT&T

has found that demand for capacity between two ILEC wire locations on its own ring is too small to justify such an approach.

Number 4: If the foregoing Request for Admission is denied, whether in whole or in part, state all facts and identify all documents supporting such denial. .

Response: See Response to Number 2.

Number 5: For each high capacity transport facility deployed by AT&T in Kentucky, please describe with particularity the nodes or termination points along the route.

Response: Not applicable.

Number 6: Please admit that AT&T has fiber based collocation arrangements at the central offices (identified by CLLI code) listed below:

KY AT&T LSVLKYAP

Response: The document attached in Response to Request for Admission Number 1 contains specific responses for each of the central offices in all BellSouth States for which this information has been requested.

Number 7: If AT&T has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where AT&T installed its own inside wiring, the percentage of buildings where AT&T is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where AT&T is using inside wiring owned by the building owner. In each of these situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings.

Response: Inside wiring is the customer's responsibility. AT&T stops at the network interface device on the customer premises.

RESPONSE TO REQUEST FOR PRODUCTION

POD 1: Produce any documents identified above.

Response: AT&T has provided one document as an attachment to the foregoing Interrogatory responses. All other documents identified are in the custody and control of BellSouth.

SUBMITTED this 27th day of February, 2004.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission this 27th day of February, 2004 is a true and accurate copy of the documents attached hereto in paper form. This version was transmitted to the Commission for forwarding to those persons receiving electronic notices from the Commission in this case. A copy of the filing was also served electronically on BellSouth Telecommunications, Inc. on February 25, 2004, and is being served by U.S. mail on February 27, 2004 to those persons whose postal addresses appear on the service list below.

/s/

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