

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
OBJECTIONS AND RESPONSES TO BELL SOUTH'S SECOND DATA
REQUEST (INTERROGATORIES Nos. 1-28)**

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 objections, both general and specific and the following Responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") Second Data Request (Nos. 1-28), served on November 24, 2003. Should additional responsive information be discovered at any time prior to hearing, AT&T reserves the right to supplement, revise, and/or modify these Responses.

OVERVIEW

These following objections are preliminary in nature. AT&T reserves the right to supplement, revise, and/or modify these objections should additional grounds for objection be discovered as AT&T prepares its responses to any discovery or at any time prior to hearing.

GENERAL OBJECTIONS

AT&T makes the following general objections to the Interrogatories which will be incorporated by reference into AT&T's specific responses to BellSouth's First Set of Interrogatories.

1. Definitions

A. AT&T objects to the lengthy "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that such terms are overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, AT&T objects to the "Definitions" section to the extent that it utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Interrogatories.

B. AT&T objects to the "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the definitions operate to include the discovery of information protected by attorney/client privilege, the work product doctrine, or any other applicable privilege.

C. AT&T objects to the "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the definitions operate to include the discovery of information and/or materials containing the mental impressions, conclusions, opinions or legal theories of any attorney or other representative of AT&T concerning the subject of the proceeding and prepared and developed in anticipation of litigation.

D. AT&T objects to the "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the definitions operate to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Orders* issued in this proceeding on October 2, 2003 and November 4, 2003 by the Kentucky Public Service Commission and other applicable Kentucky law.

E. AT&T objects to the "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the definitions operate to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to the FCC's Triennial Review Order and other applicable Kentucky law.

F. AT&T objects to the "Definitions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek disclosure of information that is proprietary confidential information or a "trade secret" pursuant to Kentucky law.

G. AT&T objects to the definitions of "you" and "your," "AT&T," and "person" to the extent that the definitions include natural persons or entities which are not parties to this proceeding, not subject to the jurisdiction of the Commission, and not

subject to the applicable discovery rules. Subject to the foregoing, and without waiving any objection, general or specific, unless otherwise ordered, responses will be provided on behalf of AT&T Communications of the South Central States, LLC, which is a certificated carrier authorized to provide regulated communications services in Kentucky and which is a party to this proceeding.

2. Instructions

A. AT&T objects to the "General Instructions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the "instructions" operate to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Orders* issued in this proceeding on October 2, 2003 and November 4, 2003 by the Kentucky Public Service Commission and other applicable Kentucky law.

B. AT&T objects to the "General Instructions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the "instructions" operate to seek disclosure of the mental impressions, conclusions, opinions, or legal theories of any attorney or other representative of AT&T concerning the subject of litigation without the requisite showing under Kentucky law.

C. AT&T objects to the "General Instructions" section of BellSouth's First Set of Interrogatories to AT&T to the extent that the "instructions" operate to seek disclosure of "all" information in AT&T's "possession, custody or control" and to the extent that said "instruction" requires AT&T to provide information or materials beyond its present knowledge, recollection or possession. With respect thereto, AT&T has employees located in many different locations in Kentucky and other states. In the course of conducting business on a nationwide basis, AT&T creates numerous documents that are not subject to either the Commission or FCC record retention requirements. These documents are kept in numerous locations and frequently are moved from location to location as employees change jobs or as business objectives change. Therefore, it is impossible for AT&T to affirm that every responsive document in existence has been provided in response to all Interrogatories. Instead, where provided, AT&T's responses will provide all information obtained by AT&T after a reasonable and diligent search conducted in connection with those Interrogatories. Such search will include only a review of those files that are reasonably expected to contain the requested information. To the extent that the "instructions" require more, AT&T objects on the grounds that compliance would be unduly burdensome, expensive, oppressive, or excessively time consuming to provide such responsive information.

3. General Objections to Interrogatories

A. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories are overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

B. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information protected by attorney/client privilege, the work product doctrine, or any other applicable privilege.

C. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information and/or materials containing the mental impressions, conclusions, opinions or legal theories of any attorney or other representative of AT&T concerning the subject of the proceeding and prepared and developed in anticipation of litigation.

D. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Orders* issued in this proceeding on October 2, 2003 and November 4, 2003 by the Kentucky Public Service Commission, and applicable Kentucky law.

E. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to the FCC's Triennial Review Order and other applicable Kentucky law.

F. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek disclosure of information that is proprietary confidential information or a "trade secret" pursuant to Kentucky law.

G. AT&T objects to all Interrogatories which require the disclosure of information which already is in the public domain or otherwise on record with the Commission or the Federal Communications Commission ("FCC").

H. AT&T objects to BellSouth's First Set of Interrogatories to AT&T to the extent that the Interrogatories seek information and discovery of facts known and opinions held by experts acquired and/or developed in anticipation of litigation or for hearing and outside the scope of discoverable information under Kentucky law.

SPECIFIC RESPONSES TO INTERROGATORIES

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 1: Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 2: Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 3: Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 4: For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 5: For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 6: For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet¹ related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 7: If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 8: Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: Bellsouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 9: Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 10: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 11: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 12: For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth First Set of Interrogatories

DATED: November 24, 2003

Interrogatory 13: For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: See attached: AT&T Responses to BellSouth's First Set of Interrogatories (1-13) filed in Florida Docket 030852-TP.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 14: Provide a list of all BellSouth wire centers in the Southeastern states to which you are currently in the process of deploying, or plan to deploy transport facilities and/or loop facilities. List wire centers if this deployment is in process or will take place from the time period beginning October 1, 2003 through December 31, 2004.

Objection: In the Triennial Review Order, the FCC establishes the factors that a state Commission should consider in any analysis of a Loop and Transport potential deployment case.

“[T]he state commission must consider various factors affecting the ability to economically deploy These factors include: evidence of alternative loop deployment at that location; local engineering costs of building and utilizing transmission facilities; the cost of underground or aerial laying of fiber or copper; the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service; local topography such as hills and rivers; availability of reasonable access to rights-of-way; building access restrictions/costs; availability/feasibility of similar quality/reliability alternative transmission technologies at that particular location.” (TRO, Paragraphs 335 and 410)

Given this directive from the FCC, information concerning the wire centers in the Southeastern states in which AT&T is “currently in the process of deploying or plans to deploy transport facilities and/or loop facilities beginning October 1, 2003 through December 31, 2004” is neither relevant to a potential deployment analysis nor likely to lead to the discovery of admissible evidence. By way of further response, this Interrogatory is asking for AT&T's future capital planning forecast, the particulars of which, as BellSouth is well aware from its own planning and forecasting processes, likely will change quarter over quarter as circumstances change. In any event, AT&T's future capital planning forecast is not relevant and to the extent AT&T implements any such plan, the results (but not any plans) might be relevant in any future “actual deployment” case that BellSouth is permitted to request under the TRO. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 15: List all BellSouth wire centers in the Southeastern states where you have collocation, either virtual or physical. In Microsoft Excel format, list the 11-character wire center CLLI code and the CLLI code designating each arrangement you have within that wire center. For each wire center listed identify:

- a. The type of collocation (caged, cageless, shared, virtual, other (with a description)) and identify the total amount of space currently occupied and reserved for future growth;
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).
- d. The amount of unused or excess space in each collocation space.
- e. The number of active and inactive DS1 cross connects
- f. The number of active and inactive DS3 Cross-connects
- g. The number of active and inactive 2-fiber cross-connects
- h. The number of active and inactive 4-fiber cross-connects.
- i. State whether you have deployed fiber "entrance" facilities that you own which connect to the collocation arrangements identified.
- j. State whether you have fiber "entrance" facilities that you have obtained from a person other than BellSouth which connect to the collocation arrangements identified.
- k. State whether you have fiber cross-connects which connect the identified arrangement(s) to other persons collocated at the same wire center. If yes, (i) identify all carriers to which your arrangements

are connected within the wire center; and (ii) identify the capacity or type of connection.

Response:

In response to subparts a, b, and c: - **See Confidential Attachments 15 and 15a.**

As to subparts: d., e., f., e., g., h., i., j., k.. AT&T objects to these Interrogatories on the grounds that the information requested is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, subparts i and j request information on "entrance facilities" which are not included within the definition of "transport" as defined by the TRO at ¶ 366 and fn. 1116.

Subject to the foregoing, and without any objections, AT&T provides the following answer for subpart k. – AT&T has no such arrangements.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 16: Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states to which you have deployed high capacity transport facilities that are operationally ready to provide dedicated transport along a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No. 1 in this docket as it seeks wire centers/central offices even if you are not actually providing transport from the locations; it also seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the IXC transport route should be identified:

BST wire center → IXC POP ← → IXC POP → BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;

- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement
- d. The total active capacity and number of fiber strands deployed as of the most recent date available;
- e. The type of facility (e.g., fiber, coaxial cable, etc.).

Response:

See AT&T's Response to Interrogatory No. 1, AT&T is not a self-provider of transport as defined by the TRO and therefore has no input to provide.

AT&T self-provides facilities that connect, for example, our switch to ILEC office A and facilities that connect our switch to ILEC office B using portions of a fiber that passes near/through both A and B, but does not either (1) connect A to B or (2) take on a dedicated basis any "traffic" that originates at either one to the other and therefore AT&T's facilities are not dedicated transport as defined by the TRO and new FCC rule.

See also, AT&T's Response to Interrogatory No. 2 AT&T is not a provider of wholesale transport as defined by the TRO and therefore has no input to provide.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 17: For each central office/wire center identified in response to Interrogatory No. 16:

- a. Are your transport facilities operationally ready to provide dedicated transport between the central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central offices on the list that does not satisfy part (a) and explain with particularity why not.

Response: See response to Interrogatory No. 16, supra.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 18: Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states from which you offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that provide a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No.2 in this docket as it seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the transport route between IXC – points of presence ("POP") should be identified:

BST wire center → IXC POP ← → IXC POP → BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- f. The type of collocation at which the facilities terminate;
- g. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- h. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- i. The total active capacity and number of fiber strands deployed as of the most recent date available;
- j. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- k. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- l. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

Response: AT&T incorporates by reference its' response to Interrogatory No. 2. Specifically, AT&T is not a provider of wholesale transport as defined by the TRO and therefore has no input to provide.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 19: For each central office/wire center identified in response to Interrogatory No. 17:

- a. Are you willing and able immediately to provide high capacity transport, on a wholesale basis, over transport facilities between the wire central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central office/wire center on the list that does not satisfy part (a) and explain with particularity why not.

Response: See Response to Interrogatory No. 17, *supra*.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 20: Identify the points within all Southeastern states at which you connect your local network facilities to the networks of other carriers, including but not limited to interconnection with other CLECs, interexchange carriers, internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotels, data centers, or similar facility. This interrogatory may be answered with network diagrams.

Response: AT&T objects to providing the points (or network diagrams showing the points) at which its network connects to the network of other CLECs, Interexchange Carriers, ISPs due to the fact that it is not relevant and not likely to lead to the discovery of admissible evidence in any potential deployment case. The TRO, at paragraphs 335 and 410 discuss the factors to be considered by a state Commission in a potential deployment case. The points at which the AT&T network connects to the networks of carriers and firms other than BellSouth has no relevance to whether AT&T could potentially deploy a high capacity loop from its network to a specific customer location or provide high capacity transport between BellSouth wire centers. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 21: Identify the points within all Southeastern states at which you connect your local network facilities to BellSouth's network, including but not limited to any and all points of presence ("POP"). This interrogatory may be answered with network diagrams.

Response: AT&T objects to this Interrogatory on the grounds that the information sought is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Specifically, this Interrogatory seeks information beyond the scope of the definition of dedicated transport in the TRO that includes only transport between pairs of ILEC wire centers.

REQUEST: Bellsouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 22: On an MSA-specific basis, in the southern states please describe with specificity the configuration of your transport and/or loop facilities; including, but not limited to: (a) the configuration of your facilities (e.g., point to point or ring configuration); (b) the customer specific locations that are accessible from your facilities; and (c) a list of all customer units accessible in a multi-tenant building.

Response:

- a. AT&T builds its self provided facilities in a ring configuration.
- b. See Confidential Attachment 2.
- c. See Confidential Attachment 2. AT&T asserts that it has access to all customer units accessible in the multi-tenant buildings listed in Attachment 2. AT&T objects to providing information on specific customer units accessible in the multi-unit buildings, and will not do so until or unless a Commission Orders such a response.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 23: Provide a list of all fiber rings in the Southeastern states you own or control and identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

Response: AT&T objects to providing a list of all fiber rings in the Southeastern states AT&T owns or controls or to identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring due to the fact that it is not relevant and not likely to lead to the discovery of admissible evidence in any potential deployment case. The TRO, at paragraphs 335 and 410 discuss the factors to be considered by a state Commission in a potential deployment case. The location of AT&T's add-drop multiplexers and fiber rings has no relevance to whether AT&T could potential deploy a high capacity loop from its network to a specific customer location or provide high capacity transport. AT&T does not intend to provide this information to BellSouth absent a Motion to Compel and Order of a Commission requiring AT&T to do so.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 24: Identify each shared or non-BellSouth location (e.g., collocation hotel) in the Southeastern states in which you are located. For each such location state:

- a. The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).

Response: AT&T objects to Interrogatory on the grounds that the information sought is not relevant nor is it reasonably calculated to lead to the discovery of admissible evidence. Specifically this Interrogatory purports to seek information which is clearly beyond the scope of the definition of dedicated transport as defined in the Triennial Review Order and includes only transport between pairs of ILEC wire centers.

Subject to the foregoing, See AT&T's Response to Interrogatory Nos. 1 and 5 to BellSouth's First Set of Interrogatories to AT&T, Florida Docket 030851-TP. Other than the switch locations identified in the said responses, AT&T is not located in any non-Bell (ILEC) locations.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 25: For each arrangement identified in response to Interrogatory 23 and in response to Interrogatory 16, please list the types of services that are provided utilizing such an arrangement.

- a. List all types of services you offer to your end users from each collocation space describe or demand and the quantity of each service you provide and/or offer.
- b. For each service identified in (a), list the average monthly revenue associated with each type of service.

Response: See response ton Interrogatory No. 24, *supra*.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 26: Provide a list of all customer locations in each/any of the Southeastern states at which you have deployed high capacity loop facilities (DS3 or greater facilities, including dark fiber) that you own and where you are serving customers using those facilities. *This interrogatory varies from Interrogatory No. 8 in this docket as it is not limited to loop facilities solely used to provide retail service.* For each customer location, identify:

- a. The RSAG valid address of the customer location;
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc. from which the loop is extended to the customer location (by 11 character CLLI);
- c. Whether you have the unrestricted ability to serve all customers at that location, if the location is a multi-tenant location. If not, explain with particularity why not, including any restrictions on your ability to serve customers and the steps you have taken to address such restrictions.
- d. The total active capacity and the number of fiber strands on your facilities at the specific customer locations using the most recent data available;
- e. Whether your facilities are operationally ready to provide DS3 loops at the specific customer location.

Response: AT&T's services provided to customers are all "retail" services. AT&T does not provide "wholesale" services to customers, and is not a wholesale provider of loops to carriers. See AT&T's response to Interrogatory No. 12.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 27: Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:

- a. pick up additional traffic;
- b. pick up additional or new customers;
- c. pick up additional or new buildings.

Response: The fiber extensions that leave the AT&T local network and deliver service to a specific building or location - is determined on an individual case basis, and must be justified based on committed traffic, actual distance from existing facilities, costs, other limitations of construction, including Rights of Ways and building entry conditions, and time to construct the facilities.

REQUEST: BellSouth Second Set of Interrogatories

DATED: November 24, 2003

Interrogatory 28: BellSouth's incorporates herein its First Set of Interrogatories and First Set of Production of Documents served October 10, 2003 as if the requests were restated in their entirety. If you have not responded to that set of Interrogatories and Request for Production of Documents consider this a reissuance of those requests.

Response: See AT&T's Responses to BellSouth's First Interrogatories (1-83) and BellSouth's First Request for Production of Documents filed on December 15, 2003 in this docket.

Respectfully submitted, this the 15th day of December, 2003.

C. Kent Hatfield by MR-13

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AT&T's Responses to BellSouth's Second Data Request
KPSC Docket No. 2003-00379
12/15/2003
Attachment No. 1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)	
from Federal Communications Commission's)	Docket No. 030852-TP
triennial UNE review: Location-Specific Review)	
for DS1, DS3 and Dark Fiber Loops, and Route-)	Filed: November 6, 2003
Specific Review for DS1, DS3 and Dark Fiber)	
Transport.)	

**AT&T'S RESPONSES TO BELL SOUTH'S
FIRST SET OF INTERROGATORIES (NOS. 1-13)**

Subject to the General Objections filed with the Florida Public Service Commission on or about October 23, 2003, AT&T Communications of the Southern States, LLC and TCG South Florida (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communications of the Southern States, LLC, served on October 15, 2003, as follows:

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 1: Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 2: Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response to Question 2									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 3: Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response to Question 3									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 4: For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 1. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 5: For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 2. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 6: For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet¹ related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Response to Interrogatory No. 3. AT&T has no input to provide.

¹ Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 7: If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

Response: Not applicable. AT&T has no input to provide.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 8: Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response - Question 8: Self-provided facilities for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm	X	X	X	X		X	X	X	X
Deny					X				

REQUEST: Bellsouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 9: Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response - Question 9: Self-provided facilities offered on wholesale basis									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 10: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response -Question 10: 3 rd Party facilities leased for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 11: Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

Response -Question 11: 3 rd Party facilities leased for reselling as wholesale service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	X	X	X	X	X	X	X	X	X

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 12: For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets)² identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

² Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

See Confidential Attachment 12 for data related to each of the 8 states affirmed in AT&T's Response to Interrogatory No. 8.

AT&T provides a minimum of 1 DS3 to each of the locations identified. Specific capacity at each location is not provided, but whether or not additional service can be provided to a location is indicated.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 15, 2003

Interrogatory 13: For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets),³ identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response: Per an agreement on this specific set of Interrogatories, AT&T is hereby providing its responses for all nine Southeastern states.

See Responses to Interrogatory Nos. 9 and 11. AT&T has no input to provide.

³ Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

SUBMITTED this 6th day of November, 2003.

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AT&T's Responses to BellSouth's Second Data Request
KPSC Docket No. 2003-00379
12/15/2003
Redacted Attachment No. 2

AT&T Confidential and Proprietary Information									
Building CLLI	Address	City	State	Zip Code	Additional Capacity Available to Provision	Reporting Company Name	Facility wholly owned	Dark fiber IRU from BST	Can serve all at location
1						AT&T	Yes	No	Yes
2						AT&T	Yes	No	Yes
1						AT&T	Yes	No	Yes
2						AT&T	Yes	No	Yes
3						AT&T	Yes	No	Yes
4						AT&T	Yes	No	Yes
5						AT&T	Yes	No	Yes
6						AT&T	Yes	No	Yes
7						AT&T	Yes	No	Yes
8						AT&T	Yes	No	Yes
9						AT&T	Yes	No	Yes
10						AT&T	Yes	No	Yes
11						AT&T	Yes	No	Yes
12						AT&T	Yes	No	Yes
13						AT&T	Yes	No	Yes
14						AT&T	Yes	No	Yes
15						AT&T	Yes	No	Yes
16						AT&T	Yes	No	Yes
17						AT&T	Yes	No	Yes
18						AT&T	Yes	No	Yes
19						AT&T	Yes	No	Yes
20						AT&T	Yes	No	Yes
21						AT&T	Yes	No	Yes
22						AT&T	Yes	No	Yes
23						AT&T	Yes	No	Yes
24						AT&T	Yes	No	Yes
25						AT&T	Yes	No	Yes
26						AT&T	Yes	No	Yes
27						AT&T	Yes	No	Yes
28						AT&T	Yes	No	Yes
29						AT&T	Yes	No	Yes
30						AT&T	Yes	No	Yes
31						AT&T	Yes	No	Yes
32						AT&T	Yes	No	Yes
33						AT&T	Yes	No	Yes
34						AT&T	Yes	No	Yes
35						AT&T	Yes	No	Yes
36						AT&T	Yes	No	Yes
37						AT&T	Yes	No	Yes
38						AT&T	Yes	No	Yes
39						AT&T	Yes	No	Yes
40						AT&T	Yes	No	Yes

41	AT&T	Yes	No	Yes
42	AT&T	Yes	No	Yes
43	AT&T	Yes	No	Yes
44	AT&T	Yes	No	Yes
45	AT&T	Yes	No	Yes
46	AT&T	Yes	No	Yes
47	AT&T	Yes	No	Yes
48	AT&T	Yes	No	Yes
49	AT&T	Yes	No	Yes
50	AT&T	Yes	No	Yes
51	AT&T	Yes	No	Yes
52	AT&T	Yes	No	Yes
53	AT&T	Yes	No	Yes
54	AT&T	Yes	No	Yes
55	AT&T	Yes	No	Yes
56	AT&T	Yes	No	Yes
57	AT&T	Yes	No	Yes
58	AT&T	Yes	No	Yes
59	AT&T	Yes	No	Yes
60	AT&T	Yes	No	Yes
61	AT&T	Yes	No	Yes
62	AT&T	Yes	No	Yes
63	AT&T	Yes	No	Yes
64	AT&T	Yes	No	Yes
65	AT&T	Yes	No	Yes
66	AT&T	Yes	No	Yes
67	AT&T	Yes	No	Yes
68	AT&T	Yes	No	Yes
69	AT&T	Yes	No	Yes
70	AT&T	Yes	No	Yes
71	AT&T	Yes	No	Yes
72	AT&T	Yes	No	Yes
73	AT&T	Yes	No	Yes
74	AT&T	Yes	No	Yes
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REDACTED

9	AT&T	Yes	No	Yes
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21	AT&T	Yes	No	Yes
22	AT&T	Yes	No	Yes

AT&T's Responses to BellSouth's Second Data Request
KPSC Docket No. 2003-00379
12/15/2003
Redacted Attachment No. 15

**ATTACHMENT
TO
INTERROGATORY NO. 15**

REDACTED

STATE	V-COORD	H-COORD	Central Office Name	LATA	National Planning Type	Statewide r	Active	DLC	Active	OC del	Collocation Type	Ratecenter	ZIP	MSA	Service	Status
AL	752200	242700	BIRMINGHAM-CAHABA HE	476	NFB	LNS	TRUE	FALSE	TRUE	FALSE	Physical	BIRMINGHAM	35243	Birmingham	active	
AL	751800	244600	MAIN & TOLL	476	FB	LNS	FALSE	TRUE	FALSE	TRUE	Virtual	BIRMINGHAM	35203	Birmingham	Active	
AL	751800	244600	MAIN & TOLL	476	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	BIRMINGHAM	35209	Birmingham	Active	
AL	753400	243900	OMACHO	476	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	BIRMINGHAM	35244	Birmingham	Active	
AL	816700	236700	MOBILE-AZALEA	480	Rifle Shot	LD	FALSE	FALSE	FALSE	TRUE	Virtual	MOBILE	36503	Mobile	active	
AL	769200	224700		480	Rifle Shot	LD	FALSE	FALSE	FALSE	TRUE	Virtual	MONTGOMERY	36104	Montgomery	Active	
FL	792900	104300	ALTAMONTE SPRINGS XA	458	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	WINTERPARK	32701	Orlando	Active	
FL	822500	58200	BOCA TECCA	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Virtual	BOCA RATON	33487	West Palm Beach-Boca Raton	Active	
FL	822500	58200	BOCA TECCA	460	FB	LNS	FALSE	FALSE	FALSE	TRUE	Virtual	BOCA RATON	33487	West Palm Beach-Boca Raton	Active	
FL	823400	57300	RATON MAIN	460	NFB	NorthPoint	TRUE	TRUE	TRUE	FALSE	Physical	BOCA RATON	33432	West Palm Beach-Boca Raton	Active	
FL	823400	57300	RATON MAIN	460	NFB	NorthPoint	FALSE	FALSE	FALSE	FALSE	Physical	BOCA RATON	33432	West Palm Beach-Boca Raton	Active	
FL	818000	115700	Beach Park	952	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	TAMPA	33609	Tampa-St. Petersburg-Clearwater	Active	
FL	820200	120300	Clearwater	952	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	DEERFIELD BEACH	33756	Tampa-St. Petersburg-Clearwater	Active	
FL	824200	57200	DEERFIELD BEACH MAIN	460	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	DEERFIELD BEACH	33441	Fort Lauderdale	Active	
FL	779300	104900	DAYTONA BEACH MAIN	456	Rifle Shot	LD	FALSE	FALSE	FALSE	TRUE	Physical	DAYTONA BEACH	32114	Daytona Beach	Active	
FL	825700	56400	FT LAUDERDALE CYPRES	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33334	Fort Lauderdale	Active	
FL	825700	56400	FT LAUDERDALE CYPRES	460	FB	LNS	FALSE	FALSE	FALSE	TRUE	Physical	FT LAUDERDALE	33334	Fort Lauderdale	Active	
FL	825700	56400	FT LAUDERDALE CYPRES	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33334	Fort Lauderdale	Active	
FL	829600	58100	FTLD JACARANDA	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33324	Fort Lauderdale	Active	
FL	828100	55800	FORT LAUDERDALE MAIN	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33301	Fort Lauderdale	Active	
FL	828100	55800	FORT LAUDERDALE MAIN	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33301	Fort Lauderdale	Active	
FL	828600	57300	OAKLAND	460	FB	LNS	FALSE	FALSE	FALSE	TRUE	Physical	FT LAUDERDALE	33313	Fort Lauderdale	Active	
FL	828600	56800	PLANTATION	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33317	Fort Lauderdale	active	
FL	828600	56800	PLANTATION	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33317	Fort Lauderdale	Active	
FL	784000	131000	GAINESVILLE MAIN	454	Rifle Shot	LD	FALSE	FALSE	FALSE	TRUE	Virtual	GAINESVILLE	32601	Gainesville	Active	
FL	830100	54600	HOLLYWOOD MAIN	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	FT LAUDERDALE	33020	Fort Lauderdale	Active	
FL	830100	54600	HOLLYWOOD MAIN	460	FB	LNS	FALSE	FALSE	FALSE	TRUE	Physical	FT LAUDERDALE	33020	Fort Lauderdale	Active	
FL	831600	56700	PEMBROKE PINES	460	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	FT LAUDERDALE	33025	Fort Lauderdale	Active	
FL	831000	55700	WEST HOLLYWOOD	460	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	HOLLYWOOD	33023	Fort Lauderdale	Active	
FL	764800	127600	JACKSONVILLE-CLAY ST	452	FB	MediaOne	FALSE	FALSE	FALSE	TRUE	Physical	JACKSONVILLE	32202	Jacksonville	Active	
FL	764800	127600	JACKSONVILLE-CLAY ST	452	FB	MediaOne	FALSE	FALSE	FALSE	TRUE	Physical	JACKSONVILLE	32202	Jacksonville	Active	
FL	765800	126200	SAN JOSE	452	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	JACKSONVILLE	32217	Jacksonville	Active	
FL	765200	127200	JACKSONVILLE	452	FB	LNS	FALSE	FALSE	FALSE	TRUE	Physical	JACKSONVILLE	32207	Jacksonville	Active	
FL	839200	53600	ALHAMBRA	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	JACKSONVILLE	32207	Jacksonville	Active	
FL	839200	53600	ALHAMBRA	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	JACKSONVILLE	32207	Jacksonville	Active	
FL	835400	54600	MIAMI AIRPORT	460	NFB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33134	Miami	Active	
FL	837400	55200	CANAL	460	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	MIAMI	33134	Miami	Active	
FL	835100	52800	GRANDE	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33166	Miami	Active	
FL	834300	55900	HIALEAH	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33128	Miami	Active	
FL	835200	54600	POINCIANA	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33128	Miami	Active	
FL	835100	55700	PALMETTO	460	FB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33012	Miami	Active	
FL	837200	53700	red road	460	NFB	LNS	TRUE	TRUE	TRUE	TRUE	Physical	MIAMI	33166	Miami	Active	
FL	834900	54600	MIAMI WEST	460	NFB	LNS	TRUE	TRUE	TRUE	FALSE	Physical	MIAMI	33172	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33143	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33144	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
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FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
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FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
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FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
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FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
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FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE	Physical	MIAMI	33180	Miami	Active	
FL	794800	12200	ODAO-OLETA	458	NFB	NorthPoint	FALSE	FALSE	FALSE	TRUE						

FL	820600	118900 Pinalas	952 NFB	LNS	TRUE	FALSE	Physical	CLEARWATER	33764 Tampa-St. Petersburg-Clearwater	Active
FL	814700	220000 Belmont	448 Rifle Shot	LD	FALSE	TRUE	Virtual	FERNDINCH	32501 Pensacola	Active
FL	789500	104400 SANFORD MAIN	458 NFB	LNS	TRUE	FALSE	Physical	SANFORD	32771 Orlando	Active
FL	822500	115900 ST. PETERSBURG	952 NFB	LNS	TRUE	FALSE	Physical	STPETERSBG	33701 Tampa-St. Petersburg-Clearwater	Active
FL	828600	109400 SARASOTA MAIN	952 Rifle Shot	LD	FALSE	TRUE	Physical	SARASOTA	34236 Sarasota-Bradenton	Active
FL	817400	117000 SWEETWATER	952 NFB	NorthPoint	FALSE	TRUE	Physical	TAMPA	33615 Tampa-St. Petersburg-Clearwater	Active
FL	817200	114700	952 NFB	NorthPoint	FALSE	TRUE	Physical	TAMPA	33602 Tampa-St. Petersburg-Clearwater	Active
FL	816000	113500 TAMPA-MAIN	952 FB	LNS	FALSE	TRUE	Physical	TAMPA	33619 Tampa-St. Petersburg-Clearwater	Active
FL	817200	114700 Tampa EAX	952 FB	LNS	TRUE	TRUE	Physical	TAMPA	33602 Tampa-St. Petersburg-Clearwater	Active
FL	794200	103400 WINTER PARK	458 FB	LNS	TRUE	TRUE	Physical	WINTERPARK	32789 Orlando	Active
FL	816200	60800 MAIN ANNEX	460 FB	LNS	TRUE	TRUE	Physical	W PALM BCH	33401 West Palm Beach-Boca Raton	Active
FL	816200	60800 MAIN ANNEX	460 FB	LNS	TRUE	TRUE	Physical	W PALM BCH	33401 West Palm Beach-Boca Raton	Active
FL	817100	61800 HAVERHILL	460 FB	LNS	TRUE	TRUE	Physical	W PALM BCH	33417 West Palm Beach-Boca Raton	Active
FL	817100	61800 HAVERHILL	460 FB	LNS	TRUE	TRUE	Physical	W PALM BCH	33417 West Palm Beach-Boca Raton	Active
FL	817500	115600 WESTSIDE	952 FB	LNS	TRUE	TRUE	Physical	TAMPA	33607 Tampa-St. Petersburg-Clearwater	Active
GA	768900	167400 AUGUSTA-MAIN AND TOL	438 Rifle Shot	LD	FALSE	TRUE	Virtual	AUGUSTA	30901 Augusta-Aiken	active
GA	765000	161500 ALBANY MAIN	438 FB	LD	FALSE	TRUE	Virtual	ALBANY	31701 Albany	Active
GA	718600	210300 ALPHARETTA-MAIN	438 FB	LNS	TRUE	TRUE	Physical	ALPHARETTA	30004 Atlanta	Active
GA	724300	203000 BUCKHEAD	438 FB	MediaOne	FALSE	TRUE	Virtual	ATLANTA	30004 Atlanta	Active
GA	724300	203000 BUCKHEAD	438 FB	MediaOne	FALSE	TRUE	Virtual	ATLANTA	30305 Atlanta	Active
GA	724300	203000 BUCKHEAD	438 NFB	NorthPoint	FALSE	TRUE	Physical	ATLANTA	30305 Atlanta	Active
GA	725900	208400 COURTLAND STREET	438 FB	MediaOne	FALSE	TRUE	Virtual	ATLANTA	30303 Atlanta	Active
GA	725900	208400 COURTLAND STREET	438 FB	LNS	TRUE	TRUE	Physical	ATLANTA	30303 Atlanta	Active
GA	725900	208400 COURTLAND STREET	438 NFB	NorthPoint	FALSE	TRUE	Physical	ATLANTA	30303 Atlanta	Active
GA	728000	208500 EAST POINT	438 FB	LNS	TRUE	TRUE	Physical	ATLANTA	30344 Atlanta	Active
GA	725500	208600 PEACHTREE PLACE	438 FB	MediaOne	FALSE	TRUE	Virtual	ATLANTA	30313 Atlanta	Active
GA	723200	208900 PEACHTREE PLACE	438 FB	LNS	TRUE	TRUE	Physical	ATLANTA	30313 Atlanta	Active
GA	723200	208900 SANDY SPRINGS	438 FB	MediaOne	FALSE	TRUE	Physical	ATLANTA	30342 Atlanta	Active
GA	723200	208900 SANDY SPRINGS	438 NFB	LNS	FALSE	TRUE	Physical	ATLANTA	30342 Atlanta	Active
GA	724100	208600 TOGO HILLS	438 FB	NorthPoint	FALSE	TRUE	Physical	ATLANTA	30329 Atlanta	Active
GA	725300	208500 WOODLAND	438 FB	MediaOne	FALSE	TRUE	Physical	ATLANTA	30318 Atlanta	Active
GA	725300	208500 WOODLAND	438 NFB	NorthPoint	FALSE	TRUE	Physical	ATLANTA	30341 Atlanta	Active
GA	755700	204600 CHAMBLEE MAIN	438 NFB	LNS	FALSE	TRUE	Physical	CHAMBLEE	31901 Columbus	Active
GA	719100	201800 Columbus Main & Toll	438 Rifle Shot	LD	FALSE	TRUE	Physical	COLUMBUS	30012 Atlanta	Active
GA	719100	207200 DULUTH	438 NFB	LNS	TRUE	TRUE	Physical	CONYERS	30096 Atlanta	Active
GA	721900	208600 DUNWOODY	438 FB	LNS	TRUE	TRUE	Physical	DULUTH	30338 Atlanta	Active
GA	721900	208600 DUNWOODY	438 FB	MediaOne	FALSE	TRUE	Physical	CHAMBLEE	30338 Atlanta	Active
GA	721100	206000	438 FB	MediaOne	FALSE	TRUE	Physical	TUCKER	30047 Atlanta	Active
GA	718600	204400 LAWRENCEVILLE MAIN	438 NFB	LNS	FALSE	TRUE	Physical	LAWRENCEVL	30045 Atlanta	Active
GA	736400	166600 MACON MAIN & TOLL	446 Rifle Shot	LD	FALSE	TRUE	Virtual	MACON	31201 Macon	Active
GA	723700	213100 MARIETTA MAIN	438 FB	LNS	TRUE	TRUE	Physical	MARIETTA	30060 Atlanta	Active
GA	723700	213100 MARIETTA MAIN	438 FB	LNS	FALSE	TRUE	Physical	MARIETTA	30060 Atlanta	Active
GA	723700	213100 MARIETTA MAIN	438 FB	MediaOne	FALSE	TRUE	Physical	MARIETTA	30071 Atlanta	Active
GA	720600	207600 northcross	438 FB	LNS	TRUE	TRUE	Physical	NORCROSS	30071 Atlanta	Active
GA	720600	207600 northcross	438 FB	MediaOne	FALSE	TRUE	Physical	NORCROSS	30071 Atlanta	Active
GA	720600	207600 northcross	438 NFB	NorthPoint	FALSE	TRUE	Physical	NORCROSS	30071 Atlanta	Active
GA	720700	210900 ROSWELL MAIN	438 FB	MediaOne	FALSE	TRUE	Physical	ROSWELL	30075 Atlanta	Active
GA	724600	211800 SMYRNA	438 FB	LNS	TRUE	TRUE	Physical	SMYRNA	30080 Atlanta	Active
GA	723700	211300 POWER FERRY	438 FB	LNS	TRUE	TRUE	Physical	SMYRNA	30080 Atlanta	Active
GA	723700	211300 POWER FERRY	438 FB	MediaOne	FALSE	TRUE	Physical	SMYRNA	30339 Atlanta	Active
GA	726900	137900 SAVANNAH BULL STREET	438 NFB	NorthPoint	FALSE	TRUE	Physical	SMYRNA	30339 Atlanta	Active
GA	722700	206900 TUCKER MAIN	438 FB	LD	FALSE	TRUE	Physical	SAVANNAH	30389 Atlanta	active
GA	722700	206900 TUCKER MAIN	438 FB	LNS	TRUE	TRUE	Physical	TUCKER	30384 Atlanta	Active

KY	652800	277300	LOUISVILLE-ARMORY P	FB	BR-AF	FALSE	TRUE	LOUISVILLE	40203	Louisville	Active
KY	652800	277300	LOUISVILLE-ARMORY P	FB	BR-AF	FALSE	TRUE	LOUISVILLE	40203	Louisville	Active
KY	646000	266200	LEXINGTON	FB	BR-AF	FALSE	TRUE	LEXINGTON	40507	Lexington	Active
LA	847600	287400	BATON ROUGE MAIN	492 Rifle Shot	LD	FALSE	TRUE	BATONROUGE	70802	Baton Rouge	active
LA	858700	298700	LAFAYETTE MAIN	489 Rifle Shot	LD	FALSE	TRUE	LAFAYETTE	70501	Lafayette	active
LA	848900	263900	NEW ORLEANS MAIN	490 Rifle Shot	LD	FALSE	TRUE	NEWORLEANS	70113	New Orleans	
MS	803500	287900	E CAP PEARL	482 Rifle Shot	LD	FALSE	TRUE	JACKSON	39201	Jackson	active
MS	753400	282500	TUPELO MAIN	482 Rifle Shot	LD	FALSE	TRUE	TUPELO	38804	Rural	Active
NC	636400	158600	BURLINGTON-DAVIS	424 NFB	LNS	TRUE	FALSE	BURLINGTON	27215	Greensboro-Winston-Salem-High f	active
NC	635600	145600	CARY CENTRAL	425 NFB	LNS	TRUE	FALSE	CARY RTP	27513	Raleigh-Durham-Chapel Hill	active
NC	657000	169600	CHARLOTTE-SOUTH BLVD	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28217	Charlotte-Gastonia-Rock Hill	Active
NC	657000	169600	CHARLOTTE-SOUTH BLVD	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28202	Charlotte-Gastonia-Rock Hill	Active
NC	655200	168400	CENTRAL	422 NFB	LNS	TRUE	FALSE	CHARLOTTE	28202	Charlotte-Gastonia-Rock Hill	active
NC	654000	170000	CHARLOTTE DERITA	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28262	Charlotte-Gastonia-Rock Hill	active
NC	667400	169000	CHARLOTTE (RED)	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28210	Charlotte-Gastonia-Rock Hill	Active
NC	668400	168700	SHARON AMITY	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28211	Charlotte-Gastonia-Rock Hill	Active
NC	665700	171000	CHARLOTTE THOMASBORO	422 NFB	LNS	TRUE	FALSE	CHARLOTTE	28208	Charlotte-Gastonia-Rock Hill	Active
NC	655300	169700	CHARLOTTE-UNIVERSITY	422 FB	LNS	TRUE	TRUE	CHARLOTTE	28262	Charlotte-Gastonia-Rock Hill	Active
NC	635500	151100	CHAPEL HILL-ROSEMARY	425 NFB	LNS	TRUE	FALSE	CHAPEL HILL	27514	Raleigh-Durham-Chapel Hill	Active
NC	634700	147700	CHAPEL HILL	423 NFB	LNS	TRUE	FALSE	CHAPEL HILL	27703	Raleigh-Durham-Chapel Hill	Active
NC	633000	149800	CHAPEL HILL	424 FB	LNS	TRUE	FALSE	DURHAM	27703	Raleigh-Durham-Chapel Hill	Active
NC	640800	164700	GREENSBORO-ASHLAND	424 FB	LNS	TRUE	TRUE	DURHAM	27703	Raleigh-Durham-Chapel Hill	Active
NC	640200	163900	EUGENE	424 FB	LNS	TRUE	TRUE	GREENSBORO	27407	Greensboro-Winston-Salem-High f	Active
NC	661000	183200	Gastonia South Street	422 NFB	LNS	TRUE	FALSE	GREENSBORO	27407	Greensboro-Winston-Salem-High f	Active
NC	668300	132900	Hickory	422 NFB	LNS	TRUE	FALSE	HICKORY	28602	Charlotte-Gastonia-Rock Hill	Active
NC	623200	144300	Rocky Mountain	951 Rifle Shot	LD	FALSE	TRUE	ROCKY MOUNT	27804	Rocky Mountain-Lenoir	Active
NC	633800	143300	RALEIGH-GLENWOOD	426 FB	LNS	TRUE	TRUE	RALEIGH	27604	Raleigh-Durham-Chapel Hill	Active
NC	633000	143500	NEW HOPE	426 FB	LNS	TRUE	TRUE	RALEIGH	27604	Raleigh-Durham-Chapel Hill	Active
NC	634400	143300	RALEIGH-MORGAN	426 FB	LNS	TRUE	TRUE	RALEIGH	27604	Raleigh-Durham-Chapel Hill	Active
NC	644000	171100	WINSTON SALEM-FIFTH	425 FB	LNS	TRUE	TRUE	WINSTN SAL	27101	Greensboro-Winston-Salem-High f	Active
NC	645100	171900	WINSTON VINEYARD	425 NFB	LNS	TRUE	FALSE	WINSTN SAL	27104	Greensboro-Winston-Salem-High f	Active
SC	702200	127900	CHARLESTON DIAL & TO	436 Rifle Shot	LD	FALSE	TRUE	CHARLESTON	29401	Charleston-North Charleston	Active
SC	687200	189400	GREENVILLE-DIAL & TO	430 Rifle Shot	LD	FALSE	TRUE	GREENVILLE	29601	Greenville-Spartanburg-Anderson	Active
TN	709100	234600	CHATTANOOGA-BRAINERD	470 NFB	LNS	TRUE	FALSE	CHATTANOOGA	37421	Chattanooga	Active
TN	709600	235700	DOODS	472 FB	LNS	TRUE	TRUE	CHATTANOOGA	37404	Chattanooga	Active
TN	709700	236500	NINETH STREET	472 FB	LNS	TRUE	TRUE	CHATTANOOGA	37403	Chattanooga	Active
TN	681100	225600	KNOXVILLE-BEARDEN	474 NFB	LNS	TRUE	FALSE	KNOXVILLE	37919	Knoxville	Active
TN	680100	225100	KNOXVILLE MAIN	474 FB	LNS	TRUE	TRUE	KNOXVILLE	37921	Knoxville	Active
TN	682000	226400	KNOXVILLE-WEST HILLS	474 NFB	LNS	TRUE	FALSE	KNOXVILLE	37919	Knoxville	Active
TN	747100	312700	Memphis Main	468 Rifle Shot	LD	FALSE	TRUE	KNOXVILLE	37919	Knoxville	Active
TN	703700	270500	NASHVILLE-BRENTWOOD	470 NFB	LNS	TRUE	FALSE	MEMPHIS	38103	Memphis	Active
TN	702000	259600	CREVE HALL	470 NFB	LNS	TRUE	FALSE	NASHVILLE	37027	Nashville	Active
TN	709900	271100	Main and Toll	470 FB	LNS	TRUE	TRUE	NASHVILLE	37211	Nashville	Active
TN	703600	271100	Main and Toll	470 FB	LNS	TRUE	TRUE	NASHVILLE	37201	Nashville	Active
TN	701900	271400	SHARONDALE	470 FB	LNS	TRUE	TRUE	NASHVILLE	37212	Nashville	Active
TN	701400	271400	NASHVILLE-UNIVERSITY	470 FB	LNS	TRUE	TRUE	NASHVILLE	37203	Nashville	Active

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