

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)	

SOUTHEAST TELEPHONE, INC.'S ANSWERS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES

SouthEast Telephone, Inc. ("SouthEast"), pursuant to the Commission's October 2, 2003, Order in this case, hereby answers BellSouth Telecommunication Inc.'s ("BellSouth's") First Set of Interrogatories.

INTERROGATORIES

1. Identify each switch owned by Company that Company uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

Response:

SouthEast Telephone does not own a CLASS 5 switch that is used to provide a qualifying service anywhere in Kentucky.

2. For each switch identified in response to Interrogatory No. 1, please:
- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (b) provide the street address, including the city and state in which the switch is located;
 - (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
 - (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts;
and
 - (f) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

Response:

Not applicable.

3. Identify any other switch not previously identified in Interrogatory No. 1 that Company uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by Company either on an unbundled or resale basis.

Response:

SouthEast does not own any other switch not previously identified in Interrogatory No. 1 that it uses to provide a qualifying service anywhere in Kentucky.

4. For each switch identified in response to Interrogatory No. 3, please:
- (a) identify the person that owns the switch;
 - (b) provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (c) provide the street address, including the city and state in which the switch is located;
 - (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
 - (f) identify all documents referring or relating to the rates, terms, and conditions of Company’s use of the switch; and

- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

Response:

Not applicable

5. Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response:

Not applicable.

6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

Response:

Not applicable.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:
- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
 - (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
 - (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
 - (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
 - (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
 - (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
 - (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
 - (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
 - (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

Not applicable.

8. Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

Response:

Not applicable.

9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

Response:

Not applicable.

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

Not applicable.

11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky using an ILEC's switch either on an unbundled or resale

basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response:

SouthEast objects on the basis that this is proprietary information. SouthEast further objects on the basis that providing the requested information to BellSouth, who as the ILEC already has access to this information would be unduly burdensome upon the CLEC, SouthEast.

12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

Response:

SouthEast objects on the basis that this is proprietary information. SouthEast further objects on the basis that providing the requested information to BellSouth, who as the ILEC already has access to this information would be unduly burdensome upon the CLEC, SouthEast.

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response:

SouthEast objects on the basis that this is proprietary information. SouthEast further objects on the basis that providing the information requested by BellSouth who as the ILEC already has access to the information would be unduly overly burdensome on the CLEC, SouthEast.

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:
- (a) Provide the Common Language Location Identifier (“CLLI”) code of the switch;
 - (b) Provide the street address, including the city and state in which the switch is located;
 - (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
 - (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
 - (f) Identify all documents referring or relating to the rates, terms, and conditions of Company’s provision of switching capability.

Response:

SouthEast does not offer to provide, nor provides switching capacity to another local exchange carrier for its use a qualifying service anywhere in the nine states in the BellSouth Region.

15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Kentucky? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Kentucky.

Response:

SouthEast does not have a switch that is technically capable of providing, but that is not presently being used to provide, a qualifying service in Kentucky.

19. Identify each MSA in Kentucky where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

SouthEast does not offer a qualifying service in any Kentucky MSA.

20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

Since SouthEast is currently a non-facilities based CLEC, the qualifying services provided outside the MSA areas are through resale or UNE-P provided by BellSouth. Therefore, SouthEast provides qualifying services in the same areas as BellSouth.

21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you

offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

Response:

SouthEast objects to this question on the basis the information requested is proprietary information. SouthEast further objects on the basis that requiring SouthEast to answer this question would be unduly burdensome since BellSouth as the ILEC has access to the requested information.

22. Identify each MSA in Kentucky where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

SouthEast objects to this question on the basis of relevance. SouthEast is of the opinion that non-qualifying services are irrelevant to this proceeding.

23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

Response:

SouthEast objects to this question on the basis of relevance. SouthEast is of the opinion that non-qualifying services are irrelevant to this proceeding.

24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

Response:

SouthEast objects to this question on the basis of relevance. SouthEast is of the opinion that non-qualifying services are irrelevant to this proceeding. Furthermore, SouthEast objects to BellSouth's thinly veiled attempt to use this proceeding to gain invaluable information from their competitors about their market strategy, market area, and overall business plans.

25. Please state the total number of end users customers in the State of Kentucky to whom you only provide qualifying service.

Response:

SouthEast objects to this question on the basis that this is proprietary information. SouthEast further objects on the grounds that requiring the CLEC to provide the requested information would be unduly burdensome since BellSouth as the ILEC already has access to the requested information.

26. For those end user customers to whom you only provide qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

27. For those end user customers to whom you only provide qualifying service in the State of Kentucky, please state the average number of lines that you provide each such end user customer.

Response:

SouthEast objects to this question on the basis that this proprietary information. SouthEast further objects in that requiring the CLEC to provide the information would be unduly burdensome since BellSouth as the ILEC already has access to the requested information.

28. Please state the total number of end users customers in the State of Kentucky to whom you only provide non-qualifying service.

Response:

SouthEast objects to this question on the basis of relevance. SouthEast is of the opinion that non-qualifying services are irrelevant to this proceeding.

29. For those end user customers to whom you only provide non-qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

SouthEast objects to this question on the basis that information requested is proprietary information. SouthEast further objects on the basis that non-qualifying services are irrelevant to this proceeding.

30. Please state the total number of end users customers in the State of Kentucky to whom you provide both qualifying and non-qualifying service.

Response:

SouthEast objects to this question on the basis that this is proprietary information. SouthEast renews its objection to BellSouth's thinly veiled attempt to use this proceeding to garner

invaluable information about its competitor's market strategy, market area, and overall business plan.

31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Kentucky, please state the average monthly revenues you receive from each such end user customer.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Kentucky, please state the average number of lines that you provide each such end user customer.

Response:

SouthEast objects to this question on the basis that this is proprietary information. SouthEast furthers objects on the basis that non-qualifying services are irrelevant to this proceeding.

SouthEast renews its objection to BellSouth using this proceeding in manner inconsistent with what SouthEast opines is not the Commission's intent.

33. Please provide a breakdown of the total number of end user customers served by Company in Kentucky by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and

describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

Response:

SouthEast objects to this question on the basis that this is proprietary information. SouthEast further objects on that basis that requiring the CLEC to provide the information would be unduly burdensome since BellSouth as the ILEC has access to much of requested information.

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Kentucky.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Kentucky.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

39. Describe how the marketing organization that is responsible for marketing qualifying service in Kentucky is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Kentucky, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

Response:

SouthEast objects on the basis that DS1 Switching is irrelevant to this proceeding.

41. Is there a typical or average number of DS0s at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

Response:

SouthEast objects on the basis that DS1 Switching is irrelevant to this proceeding.

42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, a digital PBX, or a digital Key System, be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, the PBX, or the Key System, or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

Response:

SouthEast objects on the basis that DS1 Switching is irrelevant to this proceeding.

43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

Response:

SouthEast recognizes that the cost of capital is an essential element in analyzing whether to offer a qualifying service a particular geographic market. However, at this point in our evolution SouthEast does use the “cost of capital” analysis in determining which markets to enter. In the “Migration” analysis employed by SouthEast, many issues must be considered before potential markets can be addressed, issues such as the high cost of transport.

44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

Response:

See above response.

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

Response:

SouthEast does not use a particular time horizon to evaluate a project due to instability of the federal regulations within telecommunications industry.

46. Provide your definition of sales expense as that term is used in your business.

Response:

SouthEast defines a sales expense as any expense required to make a sale.

47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

Response:

SouthEast objects to this question on the basis that this is proprietary information.

48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

Response:

SouthEast objects to this question on the basis that this is proprietary information.

49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

Response:

SouthEast does not determine which markets to go in to based on definitions of terms used in business. Currently, the issue of transport is the one of the major determinants of SouthEast's entry into a particular geographic market.

50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for Company in each state in BellSouth's region.

Response:

BellSouth has performed no hot cuts for SouthEast since January 1, 2000.

51. For each individual hot cut identified in response to Interrogatory No. 50, state:
- i. Whether the hot cut was coordinated or not;
 - ii. If coordinated, whether the hot cut occurred as scheduled;
 - iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Company, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
 - iv. If there was a problem with the hot cut, state whether Company complained in writing to BellSouth or anyone else.

Response:

Not applicable.

52. Does Company have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

Response:

Currently, SouthEast does not have a preferred process for performing batch hot cuts.

53. Does Company have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

Response:

Currently, SouthEast does not have a preferred process for performing individual hot cuts.

54. If Company has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

Response:

SouthEast is not knowledgeable enough of the BellSouth process for performing individual hot cuts to comment on their process.

55. If Company has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

Response:

SouthEast is not knowledgeable enough of the BellSouth process for performing bulk hot cuts to comment on their process.

56. Does Company have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response:

No.

57. Does Company have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

Response:

No.

58. What is the largest number of individual hot cuts that Company has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

Response:

Not applicable.

59. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response:

SouthEast does not possess adequate information on which to base an answer to this interrogatory.

60. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

See response to Int. No. 59.

61. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response:

See response to Int. No. 59.

62. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

See response to Int. No. 59.

63. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

Response:

See response to Int. No. 59.

64. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

See response to Int. No. 59.

65. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

Response:

See response to Int. No. 59.

66. Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

Response:

See response to Int. No. 59.

67. Does Company order coordinated or non-coordinated hot cuts?

Response:

To date, SouthEast has not order any type of hot cut.

68. Does Company use the CFA database?

Response:

No.

69. Identify every issue related to BellSouth's hot cut process raised by Company since October 2001.

Response:

SouthEast has not raised any hot cut related issue with BellSouth since October 2001.

70. What is the appropriate volume of loops that you contend the Kentucky Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

SouthEast has no contention in this matter, the CLEC is of the opinion that the burden of proof in this proceeding is on the ILECs.

71. What is the appropriate process that you contend the Kentucky Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

See response to Int. No. 70.

72. If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

Response:

SouthEast is not knowledgeable of the BellSouth individual hot cut process and therefore cannot agree nor disagree with the process.

73. If Company disagrees with BellSouth's bulk hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

Response:

SouthEast is not knowledgeable of the BellSouth bulk hot cut process and therefore cannot agree nor disagree with the process.

74. Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

Response:

SouthEast has not made any written complaints regarding the hot cut process to BellSouth since October 2001.

75. How many unbundled loops does Company contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

Response:

SouthEast has conducted no research on which to base such a contention and is not knowledgeable enough in this area to hazard to guess.

76. What is the appropriate information that you contend the Kentucky Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

SouthEast does not have a contention in this matter due to the fact that we do not possess adequate data on which to base an informed answer.

77. What is the average completion interval metric for provision of high volumes of loops that you contend the Kentucky Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

See response for Int. No. 76.

78. What are the rates that you contend the Kentucky Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

See response for Int. No. 76.

79. What are the appropriate product market(s) that you contend the Kentucky Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

See response for Int. No. 76.

80. What are the appropriate geographic market(s) that you contend the Kentucky Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

See response for Int. No. 76.

81. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

Response:

SouthEast objects to the question on the basis that the FCC 51.319(d)(2)(iii)(B)(2) leaves this determination up to the individual state commissions. SouthEast further objects on the basis that

the burden of proof in this proceeding is on the ILECs. The FCC has already found that the impairment exists on a national basis; the burden is on the ILECs to disprove the impairment, not the CLECs to prove that it does exist.

82. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

RESPONSE:

See response for Int. No. 81.

83. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the Kentucky Public Service Commission should consider in establishing a “cutoff” consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response:

SouthEast does not have a contention in this matter due to the fact that we do not possess adequate data on which to base an informed answer.

