

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

**MCI’S SUPPLEMENTAL RESPONSES TO BELLSOUTH TELECOMMUNICATIONS,
INC.’S SECOND SET OF INTERROGATORIES (1-28) AND SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS (1-5)**

MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services, LLC (collectively “MCI”), hereby incorporates its earlier general and specific objections and provides this supplemental response to BellSouth Telecommunications, Inc.’s (hereinafter “BellSouth”) Second Set of Interrogatories and Requests for Production of Documents to MCI¹. The supplemental responses made to BellSouth’s interrogatories and requests for production of documents are will be made subject to these and subsequent-stated objections, the Protective Agreement previously executed between the parties, and any protective order as may be issued by the Kentucky Public Service Commission (the “Commission”) in this docket. Pursuant to the protective agreement between BellSouth and MCI, MCI is providing and will provide certain confidential identified below to BellSouth.

¹ BellSouth’s “Second” set of interrogatories is the first set authorized by the Commission’s procedural schedule and incorporates by reference the switching questions mailed prior to such schedule.

INTERROGATORIES

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:

- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)

MCI SUPPLEMENTAL RESPONSE: MCI adopts and incorporates its General Objections 4, 5, 7, 8, 9, 10, 11, 13, 16, and 19, as if set forth herein verbatim. Subject to, and without waiving these objections, MCI states as follows with respect to 4(e): MCI has provided BellSouth with a list of its "On-Net" collocations. This list identifies the BellSouth wire center buildings that are physically on the network owned by MCI. Once traffic is delivered to MCI at any of its on-net collocation sites it can be delivered to any other MCI on-net collocation locations without leaving MCI's network. MCI engineers its network to provide services to end user customers. MCI does not engineer its network to move traffic between points on other carriers' (e.g., ILECs') networks. MCI's network is not designed in the point-to-point architecture contemplated by BellSouth interrogatory number 4(a). MCI's network utilizes SONET fiber rings and there are no beginning ("A") or end ("Z") locations on a circle. Therefore MCI does not have any additional information responsive to BellSouth interrogatory number 4.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

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.

MCI SUPPLEMENTAL RESPONSE: In addition to its previous response, and subject to, and without waiving its objections as previously made, MCI states that it does not provide dark fiber service.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

INTERROGATORY 12. For each state in Questions 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 facilities 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 intrabuilding 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.

MCI SUPPLEMENTAL RESPONSE: In addition to its previous response, and subject to, and without waiving its objections as previously made, MCI states that it does not provide dark fiber service, and MCI attaches an updated list of customer locations as Confidential Attachment B.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

Respectfully submitted this 20th day of February, 2004.

Respectfully submitted,

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