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December 1, 2003

Mr. Thomas N. Dorman
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RE: Case No. 2003-00379

Dear Mr. Dorman:

In response to the Commission's Order of November 4, 2003, setting forth a procedural schedule in this docket ("Procedural Order"), the Competitive Carriers of the South, Inc. ("CompSouth") write to address the scope of the matters to be considered at the informal conference scheduled for December 3, 2003, and to request the setting of an additional informal conference for January 14, 2004, to consider other important issues.

The Procedural Order states that "[t]he purpose of [the December 3] informal conference is to allow persons to present models and other information relevant to this proceeding." Procedural Order at p. 2. In recent informal discussions with Commission Staff and BellSouth Telecommunications, Inc. ("BellSouth"), CompSouth attempted to arrange the scheduling of the December 3 informal conference as a two-day conference which would include a collocation tour and demonstration concerning the hot cut issue. BellSouth stated, however, that its personnel who would need to be present at the hot cut demonstration could not be available on

either December 2 or 4 but would check for other available dates. In view of the heavy level of activity for the Commission and all parties in this case, as well as generally across the nine-state BellSouth region, CompSouth requests the Commission schedule now an informal conference for January 14, 2004 for purposes of the collocation tour and hot cut demonstration.

Given the complexity of, and many issues presented in this case, both informal conferences will proceed most efficiently if an agenda is issued in advance, so that the parties will understand what is to be covered and how much time is allocated to each portion of the workshop. At the informal conference held on October 14, 2003, over CompSouth's objection, BellSouth was allowed to present its overview of the Federal Communications Commission's Triennial Review Order ("TRO")¹. Staff stated at that time that CompSouth would be allowed the opportunity to make a similar presentation. CompSouth submits that this would therefore be an appropriate item to place at the beginning of the agenda for the December 3 informal conference. It is estimated that this presentation would take approximately one and one-half to two hours. This could be followed by BellSouth's presentation of its economic impairment model.

For the suggested January 14 informal conference, CompSouth recommends that the Commission use the morning for the parties' presentations on the hot cut process, followed by a

¹ *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Deployment of Wireline Services Offering Advance Telecommunications Capability*, CC Docket No. 98-147, "Report And Order And Order On Remand And further Notice Of Proposed Rulemaking," No. FCC 03-36, released August 21, 2003 ("TRO").

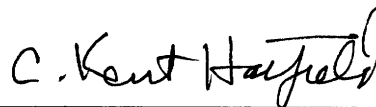
demonstration of an individual hot cut by BellSouth at one of its central offices, then moving to a CompSouth tour of a collocation site, concluding with a tour of a CompSouth member's switch in Louisville. The first step of this process, the parties' presentations on the hot cut process, is a good overview of the different viewpoints that will be presented in this case. It provides a helpful background to the physical tour that follows. This step was covered in a workshop in Florida on October 28, 2003, which lasted approximately five hours, but three local exchange companies, the Florida Competitive Carriers' Association, and individual competitive local exchange companies made presentations. Given that the number of presenters would likely be smaller in Kentucky, CompSouth's best estimate is that allocating two hours to BellSouth and one hour to CompSouth would cover the bulk of the time needed. If additional companies need time, that could be added.

The next step of presenting information relevant to the hot cut process is to visit the physical plant involved. It should take approximately three hours to do an adequate tour, one which does not inhibit participants in terms of numbers, space, or time. Because the CompSouth member switch to be used is located in Louisville, CompSouth requests that Louisville be the location for the presentations and the tour. As was done in South Carolina, and is planned for Florida and Tennessee, CompSouth and BellSouth can work together to identify an appropriate BellSouth central office for the individual hot cut demonstration, followed by a collocation tour hosted by CompSouth at that facility. The tour members would then travel to the CompSouth member switch for completion of the tour. One tour could be done mid-day, after the

presentations in the morning, followed by a second later that afternoon. CompSouth anticipates that two tours will be necessary, based on the experience of other states, and considering the number of parties and Staff who would likely be interested in attending the tours.

For these reasons, CompSouth requests that the Commission set aside an additional day for an informal conference on January 14, a date which the relevant CompSouth representatives could meet. Issuance of an agenda as outlined herein is also requested, because this will allow the parties to know in advance what will be covered and how much time is allocated for each topic. Granting this motion will avoid a rushed approach to these presentations on important topics in this case and provide an efficient use of the parties and Commissions' time and energy.

Respectfully submitted,



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