

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)	

ACCESS INTEGRATED NETWORKS, INC.
RESPONSES TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS

Access Integrated Networks, Inc., hereby serves its responses to BellSouth's First Requests for Production of Documents in this proceeding.

REQUESTS FOR PRODUCTION

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

Response: ACCESS has provided certain documents and tariff sheets in response to the Interrogatories.

2. Produce 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 in the State of Kentucky.

Response: ACCESS objects to this request on the grounds that, inasmuch as the FCC has ruled in the TRO that the impairment analysis is not to be based in individual carriers' business models, the request asks for documents that are irrelevant. The request is not reasonably calculated to lead to the discovery of admissible evidence. ACCESS objects on the grounds the request seeks documents that comprise proprietary and confidential information. ACCESS objects on the grounds the request is overbroad and unduly burdensome.

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide qualifying service.

Response: Please see Attachment No. 5 incorporated by reference as response to this request.

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you only provide qualifying service.

Response: Please see Attachment No. 4 incorporated by reference as response to this request.

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you only provide non-qualifying service.

Response: Pursuant to the agreement between BellSouth and ACCESS (via CompSouth) this request has been withdrawn.

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

Response: Please see Attachment No. 5 incorporated by reference as response to this request.

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Kentucky to whom you provide both qualifying and non-qualifying service.

Response: There are no documents. The information provided in response to the corresponding interrogatories was pulled from ACCESS' billing system.

8. Provide all documents referring or relating to the classifications used by Company to offer service to end user customers in Kentucky (e.g., residential customers, small

business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

Response: ACCESS has only 2 classifications – Business and Residential. Documentation provided directly from Tariff filed with Kentucky PSC. Pages 43 – 64 have been provided as Attachment No. 3.

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 34.

Response: Please see Attachment No. 6 incorporated by reference as response to this request.

10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Company, as requested in BellSouth's First Set of Interrogatories, No. 35.

Response: Please see Attachment No. 7 incorporated by reference as response to this request.

11. Produce all documents referring or relating to how Company determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

Response: There are no such documents. The determination is made by the end user.

12. Produce all documents referring or relating to the typical or average number of DS0s at which Company would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

Response: There are no such documents. This determination is made by the end user.

13. Produce all documents referring or relating to the cost of capital used by Company in evaluating whether to offer a qualifying service in a particular geographic market.

Response: There are no such documents. ACCESS provides qualifying services in all geographic areas as outlined by our Interconnection Agreement (ICA).

14. Produce all documents referring or relating to the time period used by Company in evaluating whether to offering a qualifying service in a particular geographic market

(e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

Response: There are no such documents. ACCESS provides qualifying services in all geographic areas as outlined by our ICA.

15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

Response: There are no such documents. ACCESS provides qualifying services in all geographic areas as outlined by our ICA.

16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

Response: There are no such documents. ACCESS provides qualifying services in all geographic areas as outlined by our ICA.

17. Produce all documents referring or relating to any complaints by Company or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

Response: There are no such documents. ACCESS does not participate in the hot cut process.

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

Response: There are no such documents. ACCESS does not participate in the hot cut process.

19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

Response: There are no such documents. ACCESS does not participate in the hot cut process.

20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process.

Response: There are no such documents. ACCESS does not participate in the hot cut process.

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process.

Response: There are no such documents. ACCESS does not participate in the hot cut process.

Respectfully submitted this 16th day of December, 2003.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission this 16th day of December is a true and accurate copy of the documents attached hereto in paper form. This version was transmitted to the Commission for forwarding to those persons receiving electronic notices from the Commission in this case. A copy of the filing was also served by U.S. mail on December 16th to those persons whose postal addresses appear on the service list below.

/s/

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