

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 SET OF INTERROGATORIES**

Access Integrated Networks, Inc. hereby serves its Responses to BellSouth's First Set of Interrogatories in this proceeding.

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: ACCESS does not own any switches.
Answer provided by: Tom Wright

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: See Response to Interrogatory No. 1.

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: ACCESS utilizes only ILEC switches.
Answer provided by Tom Wright

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: See Response to Interrogatory No. 3.

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: See Response to Interrogatory No. 1.

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: See Response to Interrogatory No. 1.

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: See Response to Interrogatory No. 6.

8. Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYP), 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: See Response to Interrogatory No. 3

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: See Response to Interrogatory No. 3

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: See Response to Interrogatory No. 9.

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: ACCESS has attempted to gather such data from its systems, but contends that BellSouth, as the vendor, should have this information by wire center and ACCESS further contends that BellSouth's vendor information is probably more accurate. The information that ACCESS was able to gather from its systems is included as Attachment 1.

Answer provided by Mark Ozanick

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: Please see answer to Interrogatory 11, which ACCESS incorporates by reference as response to this interrogatory.

Answer provided by Mark Ozanick

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: ACCESS has attempted to gather such data from its systems, but contends that BellSouth, as the vendor, should have this information by wire center and ACCESS further contends that BellSouth's vendor information is probably more accurate. The information that ACCESS was able to gather from its systems is attached as Attachment 2.

Answer provided by Jonathan Goff

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: ACCESS does not offer or provide switching capacity to any other local exchange carriers.
Answer provided by Tom Wright

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: As stated in Objections filed contemporaneously with this response, ACCESS objects to Interrogatory No. 15 on the grounds it seeks information that is irrelevant to the issues in this case, and is not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the FCC has determined in the Triennial Review Order that the impairment analysis to be conducted by the Commission is not to be based on individual carriers’ business models. ACCESS further objects on the grounds the interrogatory seeks discovery of proprietary and confidential business information.

Objection by Counsel for ACCESS.

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:** As stated in objections filed contemporaneously, ACCESS objects to Interrogatory No. 16 on the grounds it seeks information that is irrelevant to the issues in this case and is not reasonably calculated to lead to the discovery of admissible evidence, given the FCC's ruling in the Triennial Review Order that the impairment analysis is not to be based on individual carriers' business models. ACCESS also objects on the grounds the interrogatory asks for proprietary and confidential business information.

Objection by Counsel for ACCESS

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: ACCESS objects to Interrogatory No. 17 on the grounds it seeks information that is irrelevant to the issues in this case and is not reasonably calculated to lead to the discovery of admissible evidence, given the FCC's ruling in the Triennial Review Order that the impairment analysis is not to be based on individual carriers' business models. ACCESS also objects on the grounds the interrogatory asks for proprietary and confidential business information. Notwithstanding this objection, and without waiving it, ACCESS states there are no responsive documents to be identified as ACCESS has not performed an analysis of the financial viability of self-provisioning switching to our end users.

Objection by Counsel for ACCESS; Answer by Tom Wright.

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: No. ACCESS has no switches.
Answer provided by Tom Wright

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: Answer provided by Mark Ozanick.

Bowling Green Metro
Clarksville Metro (KY & TN)
Elizabethtown Metro
Evansville Metro
Lexington-Fayette Metro
Louisville Metro
Owensboro Metro

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:

Anderson	Franklin	Lincoln	Nicholas
Bell	Fulton	Logan	Ohio
Boyle	Graves	Lyon	Owen
Breathitt	Harlan	Madison	Pike
Breckinridge	Harrison	Marshall	Powell
Butler	Hickman	Martin	Simpson
Caldwell	Hopkins	Mason	Todd
Calloway	Johnson	McCracken	Union
Carroll	Lawrence	Mercer	Washington
Crittenden	Lee	Montgomery	Whitley
Floyd	Letcher	Muhlenberg	

Answer provided by Mark Ozanick.

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: See Attachment 3, pages 43 - 64 of Access's tariff, Section 3 Description of Service, copies of which are attached and which Access incorporates by reference as its answer to this interrogatory.

Answer provided by Sharyl Fowler

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: By agreement of BellSouth and ACCESS (via CompSouth) this question has been withdrawn.

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: By agreement of BellSouth and ACCESS (via CompSouth) this question has been withdrawn.

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: By agreement of BellSouth and ACCESS (via CompSouth) this question has been withdrawn.

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

Response: Total end users in Kentucky to whom we provide only qualifying service - 1,543.

Answer provided by Jonathan Goff

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: ACCESS interprets the Interrogatory to refer to an aggregate number. If BellSouth intends to require ACCESS to calculate monthly revenues for each customer, then the response would be that ACCESS does not track revenue in this manner. In the form that ACCESS does track revenue, the average monthly revenue for customers to whom ACCESS provides qualifying service is, on a per line basis, for Kentucky for 2003 is \$53.80 and for 2002 is \$53.13.

Answer provided by Rocky Davidson

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: For the total 1,543 end users in the State of Kentucky to whom we provide only qualifying service, the average number of lines per end user is 2.49 lines.
Answer provided by Jonathan Goff
28. Please state the total number of end users customers in the State of Kentucky to whom you only provide non-qualifying service.
Response: By agreement of BellSouth and ACCESS (via CompSouth) this question has been withdrawn.
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: By agreement of BellSouth and ACCESS (via CompSouth) this question has been withdrawn.
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: ACCESS provides both qualifying and non-qualifying service to 1,165 end users in the state of Kentucky.
Answer provided by Jonathan Goff
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: ACCESS interprets the Interrogatory to refer to an aggregate number. If BellSouth intends to require ACCESS to calculate monthly revenues for each customer, then the response would be that ACCESS does not track revenue in this manner. In the form that ACCESS does track revenue, the average monthly revenue for customer to whom ACCESS provides qualifying and non-qualifying service is, on a per line basis, for Kentucky for 2003 is \$57.58 and for 2002 is \$58.44.
Answer provided by Rocky Davidson

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: For the total 1,165 end users in the Kentucky to whom we provide both qualifying and non-qualifying service, the average number of lines per end user is 2.69 lines.

Answer provided by Jonathan Goff

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: ACCESS has only two classifications of service – Business and Residential. There are 1,148 end users having business service, 204 end users having residential service, and 37 end users having both business and residential service. For the definition and description of these classifications, please see pages 43 – 64 (attached) of ACCESS’s tariff filed with the Kentucky Public Service Commission.

Answer provided by Jonathan Goff and Sharyl Fowler

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: ACCESS interprets the Interrogatory to refer to an aggregate number. If BellSouth intends to require ACCESS to calculate acquisition costs on a “per class” basis, then the response would be that ACCESS does not track revenue in this manner. In the form that ACCESS does track acquisition costs, ACCESS has attempted to gather such data to the degree that such data exists. ACCESS’ average monthly acquisition cost for 2003 is \$189.40. Please see Attachment No. 6 that ACCESS incorporates by reference as response to this interrogatory.

Answer provided by Rocky Davidson

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: ACCESS interprets the Interrogatory to refer to an aggregate number. If BellSouth intends to require ACCESS to calculate churn on a “per class” basis, then the response would be that ACCESS does not track revenue in this manner. In the form that ACCESS does track churn, ACCESS has attempted to

gather such data to the degree that such data exists. ACCESS' average monthly churn rate for 2003 is 2.67%. Please see Attachment No. 7 that ACCESS incorporates by reference as response to this interrogatory.

Answer provided by Rocky Davidson

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: ACCESS does not track market share, as we do not have the information necessary to do so. As the vendor of UNE-P and DS0, BellSouth has better information for both the numerator and denominator.

Answer provided by Tom Wright

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: ACCESS does not track market share, as we do not have the information necessary to do so. As the vendor of UNE-P and DS0, BellSouth has better information for both the numerator and denominator.

Answer provided by Tom Wright

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: ACCESS does not track market share, as we do not have the information necessary to do so. As the vendor of UNE-P and DS0, BellSouth has better information for both the numerator and denominator.

Answer provided by Tom Wright

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: As stated in objections filed contemporaneously, ACCESS objects to Interrogatory No. 39 on the grounds that it seeks information that is irrelevant to the issues in the case and is not reasonably calculated to lead to the discovery of admissible evidence, given that the FCC has ruled the impairment analysis is not to be based on individual carriers' business models. ACCESS also objects on the grounds the interrogatory seeks disclosure of confidential and proprietary business information. ACCESS further objects to the question as framed because it is unduly burdensome and oppressive. ACCESS literally has hundreds of different

arrangements with its field representatives. To identify each and every such variation would be unduly burdensome, oppressive, and excessively time consuming.
Objection by Counsel for ACCESS

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: ACCESS does not make this determination. Decisions of this nature are made by the customer.
Answer provided by Tom Wright

41. Is there a typical or average number of DSOs 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: ACCESS does not make this determination. Decisions of this nature are made by the customer.
Answer provided by Tom Wright

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 DSOs? For instance, if a customer had 10 DSOs, 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 DSOs? 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 DSOs.)

Response: ACCESS does not provide customer premise equipment, nor do we determine what type of equipment the customer's choice of service would require. Decisions of this nature are made by the customer.
Answer provided by Tom Wright

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: ACCESS's business policy is to provide service wherever requested in BellSouth's service area. ACCESS does not differentiate among locations within its overall service area based on cost of capital considerations.
Answer provided by Tom Wright

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: Please see the answer to Interrogatory 43 above, which ACCESS incorporates by reference as its answer to this interrogatory.

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: ACCESS's policy is to offer all qualifying services in all geographic areas within its service area.

Answer provided by Tom Wright

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

Response: ACCESS defines "sales expense" as any expense incurred in gaining a sale to a customer.

Answer provided by Apryle Ovell

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: As a matter of policy, ACCESS offers its services throughout its entire service area, which is coextensive with BellSouth's service area. No such estimate is made for particular geographic markets within that area.

Answer provided by Tom Wright

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

Response: ACCESS defines G&A costs as an expense that cannot be allocated to a specific process, but is a necessary expense to the company as a whole.

Answer provided by Apryle Ovell

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: ACCESS's policy is to offer its services throughout its service area, which is coextensive with BellSouth's service area. No such estimate is made for particular geographic markets within that area.

Answer provided by Tom Wright

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: None.

Answer provided by Tom Wright

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. See response to Interrogatory No. 50.

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: Not applicable. Please see Response to Interrogatory No. 52.

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.
Answer provided by Tom Wright
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: Not applicable. Please see response to Interrogatory No. 54.
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: Not applicable. Please see response to Interrogatory No. 54.
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: Not applicable. Please see response to Interrogatory No. 54.
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: None.
Response provided by Tom Wright
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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.
Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.

Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.
Answer provided by Tom Wright

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: ACCESS has never participated in this process, and thus has no experience to determine a preferred process.
Answer provided by Tom Wright

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

Response: No
Answer provided by Tom Wright

68. Does Company use the CFA database?

Response: Not currently.
Answer provided by Tom Wright

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

Response: ACCESS does not currently participate in the hot cut process and therefore has not identified any issues.
Answer provided by Tom Wright

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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright

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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright

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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright
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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright
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: ACCESS does not currently participate in the hot cut process and therefore has not identified any issues.
Answer provided by Tom Wright
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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright
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: To date, ACCESS has not participated in the hot cut process, thus has no experience by which to determine this process.
Answer provided by Tom Wright
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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

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: ACCESS has not formulated a position at this time.
Answer provided by Tom Wright

Respectfully submitted this 16th day of December, 2003.

Respectfully submitted,

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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/ Douglas F. Brent

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