

**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	)	

**CINERGY COMMUNICATIONS COMPANY’S OBJECTIONS AND RESPONSES TO  
BELLSOUTH TELECOMMUNICATIONS, INC.’S SECOND SET OF  
INTERROGATORIES (1-28) AND SECOND REQUEST FOR PRODUCITON OF  
DOCUMENTS (1-5)**

Cinergy Communications Company (“CCC”) hereby provides its objections and responses to BellSouth Telecommunications, Inc.’s (“BellSouth”) Second Set of Interrogatories.

**GENERAL OBJECTIONS**

CCC makes the following general objections to BellSouth Telecommunications, Inc.’s Second Set of Interrogatories and Second Request for Production:

1. CCC objects to the “Definitions” section, the “General Instructions,” and the individual request items of BellSouth’s Second Set of Interrogatories and Second Requests for Production of Documents to Cinergy Communications Company to the extent that they are overly broad, unduly burdensome, and/or oppressive. CCC will attempt to identify specific requests to which this objection applies within the specific objections that follow.

2. CCC objects to the “Definitions,” the “General Instructions,” and the individual request items to the extent they are irrelevant and not likely to lead to the discovery of admissible evidence. By way of illustration and not limitation, CCC objects to requests that seek materials and documents that are inconsistent with or unrelated to the parameters and methodology of the impairment analysis prescribed by the FCC in its Triennial Review Order. CCC will attempt to

identify individual requests to which this general objection is applicable within the specific objections that follow.

3. CCC objects to the “Definitions,” the “General Instructions,” and the request items to the extent they are vague, ambiguous, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Requests.

4. CCC objects to the “General Instructions” and the request items of BellSouth’s Second Set of Interrogatories and Second Set of Requests for Production to CCC to the extent that they purport to impose discovery obligations on CCC that exceed the scope of discovery allowed by the applicable Kentucky Rules of Civil Procedure.

5. CCC objects to the “General Instructions” section and the individual request items of BellSouth’s Second Set of Interrogatories and Second Requests for Production to CCC to the extent that the “instructions” purport to seek disclosure of “all” documents, materials or information in CCC’s possession. CCC’s responses will provide all nonprivileged and otherwise discoverable information obtained by CCC after a reasonable and diligent search conducted in connection with the Requests. Such search will include a review of only those files that are reasonably expected to contain the requested documents and/or information. To the extent that “instructions” or individual requests require more, CCC objects on the grounds that compliance would be unduly burdensome, expensive, oppressive, or excessively time consuming, and unnecessary to accomplish BellSouth’s legitimate discovery needs.

6. CCC objects to BellSouth’s Second Set of Interrogatories and Second Requests for Production to the extent that the requests seeks discovery of materials and/or information protected by attorney/client privilege, the work product doctrine, the accountant/client privilege, or any other applicable privilege.

7. CCC objects to BellSouth's Second Set of Interrogatories and Second Set of Requests for Production to the extent that the requests would require disclosure of information that constitutes trade secrets and/or confidential and proprietary information that should be disclosed either not at all or only pursuant to the terms of a mutually acceptable confidentiality agreement and use of the Commission's rules and orders governing confidentiality

8. CCC objects to all requests which would require the production of materials and/or information which is already in BellSouth's possession or is in the public record before the Commission. To duplicate information that BellSouth already has or is readily available to BellSouth would be unduly burdensome and oppressive.

9. CCC objects to BellSouth's Second Set of Interrogatories and Second Request for Production to the extent BellSouth seeks to impose an obligation on CCC to respond on behalf of subsidiaries and/or former officers, employees, agents, and directors on the grounds that such requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

### **INTERROGATORIES**

1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in Kentucky for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities For purposes of this question, you "own" transport

facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light 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.

**Response:** Denied.

2. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in Kentucky. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you “own” a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber 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, other unbundled network elements or other services obtained from third parties, should not be included in this response.

**Response:** Denied.

3. Affirm or deny whether you have acquired on a wholesale basis from a third party DS1, DS3, or dark fiber transport between two or more ILEC central offices in Kentucky. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

**Response:** Denied.

4. In Question 1, if you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list (using spreadsheet labeled “Question 4 Spreadsheet – Self-provisioned Transport Information”) of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).

- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

**Response:** N/A

5. In Question 2, if you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list (using spreadsheet labeled “Question 5 Spreadsheet – Wholesale Transport Information”) of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.

- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

**Response:** N/A

6. In Question 3, if you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide a list (using spreadsheet labeled “Question 6 Spreadsheet – Acquired Wholesale Transport Information”) of all ILEC CO to ILEC CO routes along which you acquire such transport identifying:

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

**Response:** N/A

7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

**Response:** N/A

8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS1 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 Kentucky 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.

**Response:** Denied.

9. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 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 Kentucky. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other

unbundled network elements or other services obtained from third parties, should not be included in this response.

**Response:** Denied.

10. Affirm or deny that you have obtained from a third party, high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in Kentucky. Self-provided facilities that you “own” as defined in 8 above should not be included in this response.

**Response:** Denied.

11. Affirm or deny that you have obtained from a third party, high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in Kentucky. Self-provided facilities that you “own” as defined in 9 above should not be included in this response.

**Response:** Denied.

12. If in Questions 8 and 10 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 (using spreadsheet labeled “Question 12 Spreadsheet – Self-provisioned Loop Information”) of the customer locations to which you have deployed such loops, 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 facility 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 intra building 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.

**Response:**                    N/A

13.    If in Questions 9 and 11 you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list (using spreadsheet labeled “Question 13 Spreadsheet – Wholesale Loop Information”) of the customer locations to which you have provided such loops, identifying:

- a. The RSAG valid address of each customer location.

- b. The CLLI code of the location 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 facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE 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 intra building 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 eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

**Response:** N/A

14. Provide a list of all BellSouth wire centers in Kentucky to which you are currently in the process of deploying, or plan to deploy transport facilities and/or loop facilities. List wire centers if this deployment is in process or will take place from the time period beginning October 1, 2003 through December 31, 2004.

**Response:** N/A

15. List all BellSouth wire centers in Kentucky where you have collocation, either virtual or physical. In Microsoft Excel format, list the 11-character wire center CLLI code and the CLLI code designating each arrangement you have within that wire center. For each wire center listed identify:

- a. The type of collocation (caged, cageless, shared, virtual, other (with a description)) and identify the total amount of space currently occupied and reserved for future growth;
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).
- d. The amount of unused or excess space in each collocation space.
- e. The number of active and inactive DS1 cross connects
- f. The number of active and inactive DS3 Cross-connects
- g. The number of active and inactive 2-fiber cross-connects
- h. The number of active and inactive 4-fiber cross-connects.
- i. State whether you have deployed fiber “entrance” facilities that you own which connect to the collocation arrangements identified.
- j. State whether you have fiber “entrance” facilities that you have obtained from a person other than BellSouth which connect to the collocation arrangements identified.

- k. State whether you have fiber cross-connects which connect the identified arrangement(s) to other persons collocated at the same wire center. If yes, (i) identify all carriers to which your arrangements are connected within the wire center; and (ii) identify the capacity or type of connection.

**Response:** See spreadsheet Response to Interrogatory #15 for responses.

16. Provide a list of all BellSouth wire centers and/or central offices Kentucky to which you have deployed high capacity transport facilities that are *operationally ready* to provide dedicated transport along a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. *This interrogatory varies from previous questions as it seeks wire centers/central offices even if you are not actually providing transport from the locations; it also seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the IXC transport route should be identified:*

BST wire center → IXC POP ← → IXC POP → BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;

- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement
- d. The total active capacity and number of fiber strands deployed as of the most recent date available;
- e. The type of facility (e.g., fiber, coaxial cable, etc.).

**Response:**                    N/A

17. For each central office/wire center identified in response to Interrogatory No. 16:

- a. Are your transport facilities operationally ready to provide dedicated transport between the central office/wire center identified and any other ILEC wire center on the same list?

- b. If your responses to part (a) above is negative, identify each such the ILEC central offices on the list that does not satisfy part (a) and explain with particularity why not.

**Response:** N/A

18. Provide a list of all BellSouth wire centers and/or central offices within Kentucky from which you offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that provide a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. *This interrogatory varies from previous questions as it seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the transport route between IXC – points of presence (“POP”) should be identified:*

BST wire center → IXC POP ← → IXC POP → BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;

- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are wiling and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

**Response:** N/A

19. For each central office/wire center identified in response to Interrogatory No. 17:
- a. Are you willing and able immediately to provide high capacity transport, on a wholesale basis, over transport facilities between the wire central office/wire center identified and any other ILEC wire center on the same list?
  - b. If your responses to part (a) above is negative, identify each such the ILEC central office/wire center on the list that does not satisfy part (a) and explain with particularity why not.

**Response:** N/A

20. Identify the points within Kentucky at which you connect your local network facilities to the networks of other carriers, including but not limited to interconnection with other CLECs, interexchange carriers, internet service providers at any point of presence (“POP”), network access point (“NAP”), collocation hotels, data centers, or similar facility. This interrogatory may be answered with network diagrams.

**Response:** N/A

21. Identify the points within Kentucky at which you connect your local network facilities to BellSouth's network, including but not limited to any and all points of presence ("POP"). This interrogatory may be answered with network diagrams.

**Response:** Objection. This information is readily available to BellSouth.

22. On an MSA-specific basis, in Kentucky please describe with specificity the configuration of your transport and/or loop facilities; including, but not limited to: (a) the configuration of your facilities (e.g., point to point or ring configuration); (b) the customer specific locations that are accessible from your facilities; and (c) a list of all customer units accessible in a multi-tenant building.

**Response:** N/A

23. Provide a list of all fiber rings in Kentucky you own or control and identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

**Response:** N/A

24. Identify each shared or non-BellSouth location (e.g., collocation hotel) in Kentucky in which you are located. For each such location state:

- a. The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).

- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).

**Response:** N/A

25. For each arrangement identified in response to Interrogatory 23 and in response to Interrogatory 16, please list the types of services that are provided utilizing such an arrangement.

- a. List all types of services you offer to your end users from each collocation space describe or demand and the quantity of each service you provide and/or offer.
- b. For each service identified in (a), list the average monthly revenue associated with each type of service.

**Response:** N/A

26. Provide a list of all customer locations in Kentucky at which you have deployed high capacity loop facilities (DS3 or greater facilities, including dark fiber) that you own and where you are serving customers using those facilities. *This interrogatory varies from Interrogatory No. 8 as it is not limited to loop facilities solely used to provide retail service.* For each customer location, identify:

- a. The RSAG valid address of the 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 (by 11 character CLLI);
- c. Whether you have the unrestricted ability to serve all customers at that location, if the location is a multi-tenant location. If not, explain with particularity why not,

including any restrictions on your ability to serve customers and the steps you have taken to address such restrictions.

- d. The total active capacity and the number of fiber strands on your facilities at the specific customer locations using the most recent data available;
- e. Whether your facilities are operationally ready to provide DS3 loops at the specific customer location.

**Response:** N/A

27. Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:

- a. pick up additional traffic;
- b. pick up additional or new customers;
- c. pick up additional or new buildings.

**Response:** N/A

28. BellSouth incorporates herein its First Set of Interrogatories and First Request for Production of Documents served October 10, 2003, as if the requests were restated in their entirety. If you have not responded to that set of interrogatories and request for production, please consider this a reissuance of those requests.

**Response:** See responses filed contemporaneously herewith.

## REQUESTS FOR PRODUCTION

1. Produce any maps and/or diagrams that illustrate the most current information available for the physical location of your high capacity transport and/or loop facilities within Kentucky.

**Response:** N/A

2. Produce any documents identified in response to BellSouth's Second Set of Interrogatories and any document identified but not yet produced in response to BellSouth's First Set of Interrogatories or First Requests for Production of Documents.

**Response:** N/A

3. Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your actual or planned deployment of high capacity transport and/or loop facilities within Kentucky.

**Response:** N/A

4. Produce any business case from 2000 to present in your possession, custody, or control that evaluates, discusses, analyzes or otherwise refers or relates to your obtaining high capacity transport and/or loop facilities from other persons.

**Response:** N/A

5. Produce all documents from 2000 to present referring or relating to how you determine whether or not to deploy high capacity transport and/or loop facilities.

**Response:** N/A

Respectfully submitted,

/s/

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C. Kent Hatfield  
Douglas F. Brent  
STOLL, KEENON & PARK, LLP  
2650 AEGON Center  
400 West Market Street  
Louisville, Kentucky 40202  
(502) 568-9100

*Attorneys for Cinergy Communications Company*

## CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission this 18<sup>th</sup> 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 18<sup>th</sup> to those persons whose postal addresses appear on the service list below.

/s/

\_\_\_\_\_  
Douglas F. Brent

James T. Meister  
ALLTEL Kentucky, Inc.  
Kentucky ALLTEL, Inc.  
ALLTEL Communications, Inc.

[james.t.meister@alltel.com](mailto:james.t.meister@alltel.com)

BellSouth Telecommunications, Inc.

[BellSouthKY.CaseFiling@BellSouth.com](mailto:BellSouthKY.CaseFiling@BellSouth.com)

Competitive Carriers of the South, Inc.

[glsharp@comcast.net](mailto:glsharp@comcast.net)  
[tonykey@att.com](mailto:tonykey@att.com)  
[hwalker@boultcummings.com](mailto:hwalker@boultcummings.com)

Wanda Montano  
Vice President, Regulatory & Industry  
US LEC Communications

[wmontano@uslec.com](mailto:wmontano@uslec.com)

Hon. Ann Louise Chevront  
Office of the Attorney General  
Utility & Rate Intervention Division

[ann.chevront@law.state.ky.us](mailto:ann.chevront@law.state.ky.us)

Cincinnati Bell  
[jouett.Kinney@cinbell.com](mailto:jouett.Kinney@cinbell.com)  
[mark.romito@cinbell.com](mailto:mark.romito@cinbell.com)  
[pat.rupich@cinbell.com](mailto:pat.rupich@cinbell.com)

Kennard Woods  
Senior Attorney  
MCI WorldCom Communications

[ken.woods@mci.com](mailto:ken.woods@mci.com)

Kentucky Cable Telecommunications  
Association  
P.O. Box 415  
Burkesville, KY 42717

Jonathan N. Amlung  
Counsel for:  
SouthEast Telephone, Inc.

[Jonathon@amlung.com](mailto:Jonathon@amlung.com)

AT&T Communications of the  
South Central States

[rossbain@att.com](mailto:rossbain@att.com)  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Charles (Gene) Watkins  
Senior Counsel  
Diecca Communications, Inc  
d/b/a Covad Communications

[gwatkins@covad.com](mailto:gwatkins@covad.com)

[jbelle@covad.com](mailto:jbelle@covad.com)