

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN RE:

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

ITC^DELTA COM'S RESPONSE TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO ITC^DELTA COM AND BTI

ITC DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine and BTI Corporation (hereinafter "ITC^DeltaCom"), pursuant to the Procedural and Scheduling Order entered on November 4, 2003, hereby submits the following Responses to BellSouth Telecommunications, Inc.'s First Request for Production of Documents to ITC^DeltaCom.

REQUESTS FOR PRODUCTION

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

RESPONSE: All documents identified in response to BellSouth's individual interrogatories are marked as such and appended to the interrogatories subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any confidentiality order of the Kentucky Public Service Commission.

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: ITC^DeltaCom objects that this request is overly broad, unduly burdensome, and seeks trade secrets.

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: ITC^DeltaCom objects that this request is overly broad, unduly burdensome, and seeks trade secrets. Additionally, ITC^DeltaCom does not have local customers in Kentucky. Notwithstanding its objections, ITC^DeltaCom files consolidated financials with the Securities Exchange Commission.

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: ITC^DeltaCom does not have the information requested in the manner requested.

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: ITC^DeltaCom objects on the grounds that this information is not relevant or necessary, and this information is not readily available in the format sought.

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: ITC^DeltaCom objects on the grounds that this information is not relevant or necessary, and this information is not readily available in the format sought.

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: ITC^DeltaCom objects that this request is overly broad and unduly burdensome. Notwithstanding its objection, see response to Interrogatory No. 12.

8. Provide all documents referring or relating to the classifications used by Company to offer service to end user customers 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: ITC^DeltaCom objects that this request is overly broad and unduly burdensome. Notwithstanding its objection, BTI categorizes end user customers as residential, business, or government.

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: ITC^DeltaCom objects that this request is overly broad, unduly burdensome, and seeks trade secrets.

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: ITC^DeltaCom objects that this request is overly broad, unduly burdensome, and seeks trade secrets.

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: See response to Interrogatory No. 40

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: See response to Interrogatory No. 40.

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: ITC^DeltaCom does not have any documents responsive to this request.

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: ITC^DeltaCom does not have any documents relating to whether a qualifying service in a particular geographic market will be offered in a certain time period. See response to Interrogatory No. 45.

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: ITC^DeltaCom does not have documents responsive to this request.

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: ITC^DeltaCom does not have documents responsive to this request.

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: On information and belief, BellSouth has all such documents.

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: ITC^DeltaCom does not have any such documents in its possession at this time.

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: ITC^DeltaCom does not have any such documents in its possession at this time.

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: ITC^DeltaCom does not have any such documents in its possession at this time.

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: ITC^DeltaCom does not have any such documents in its possession at this time.

Respectfully submitted this 18th day of December, 2003.

Respectfully submitted,

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