



*passionate about quality™*

DEC 19 2003

December 15, 2003

Commonwealth of Kentucky  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

Re: Review of Federal Communications Commission's Triennial Review Order  
Regarding Unbundling Requirements for Individual Network Elements PSC  
2003-00379

Dear Mr. Dorman:

Enclosed please find PAETEC Communications, Inc. ("PAETEC") responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (1-83), BellSouth Telecommunications, Inc.'s First Requests for Production of Documents (1-21), and BellSouth Telecommunications, Inc.'s Second Set of Interrogatories (1-28) and Second Request For Productions of Documents (1-5). Although PAETEC is certified to provide local service in the State of Kentucky, at this time PAETEC has no local customers within Kentucky.

Please don't hesitate to contact me with any questions you might have at (585) 340-2979 or via email at [amy.dickinson@paetec.com](mailto:amy.dickinson@paetec.com). ✓ 8/18

Sincerely,

Amy L. Dickinson  
Regulatory Analyst

enclosures

**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).

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC does not provide local service (or qualifying service) in Kentucky.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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;

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

8. 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. 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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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;

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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;

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable



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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

At this time PAETEC has no switches that are currently technically capable of providing a qualifying service in Kentucky.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC provides resold long distance within the State of Kentucky to approximately 50 customers.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Please see answer to interrogatory #22

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Please refer to "PAETEC Communications, Inc. Kentucky P.S.C. Tariff No. 1" for rates and services.

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

**PAETEC Response** - Responsible Witness: Amy Dickinson

Zero customers.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC currently has 54 long distance customers in Kentucky.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Average monthly revenue is \$65.55 per customer

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable, PAETEC provides only long distance service in Kentucky.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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).

**PAETEC Response** - Responsible Witness: Amy Dickinson

<u>Residential Customers</u>	<u>Business Customers</u>
9	45

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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 DSI 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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

41. Is there a typical or average number of DS0s 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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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 DS0s? For instance, if a customer had 10 DS0s, 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 DS0s? 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 DS0s.)

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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?

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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?

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable



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?

**PAETEC Response** - Responsible Witness: Judy Messenger  
It would vary between location; one to five years.

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

**PAETEC Response** - Responsible Witness: Rocco Luiere  
Any non-network related expense that either supports the overall sales effort or occurs as a direct result of a sale.

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?

**PAETEC Response** - Responsible Witness: Judy Messenger  
PAETEC has implemented a decentralized operating structure to reduce administrative costs and enhance responsiveness to customer needs

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

**PAETEC Response** - Responsible Witness: Rocco Luiere  
Any non-network, non-sales expense.

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?

**PAETEC Response** - Responsible Witness: Judy Messenger

PAETEC has implemented a decentralized operating structure to reduce administrative costs and enhance responsiveness to customer needs

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

Information is not available

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

PAETEC has a Switch Technician and Systems Engineer on all hot cuts. The Switch Technician performs all the Central Office work and the Systems Engineer performs all the translation requirements. We also have a Sales Engineer at the customer premise

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

PAETEC has a Switch Technician and Systems Engineer on all hot cuts. The Switch Technician performs all the Central Office work and the Systems Engineer performs all the translation requirements. We also have a Sales Engineer at the customer premise.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

PAETEC has no knowledge of BellSouth's process.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

PAETEC has no knowledge of BellSouth's process.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis

PAETEC does not track this information.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
PAETEC does not track this information.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
PAETEC does not track this information.

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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

**PAETEC Response** - Responsible Witness: Mike Serinis  
PAETEC's hot cuts are coordinated

68. Does Company use the CFA database?

**PAETEC Response** - Responsible Witness: Mike Serinis  
Not applicable

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC has had no issues within Kentucky.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

74. Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC is unaware of any complaints.

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?

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable



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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

83. What is the maximum number of DSO 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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

**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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

No

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

No

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

No

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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:
- 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.)
  - 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.
  - Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
  - If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
  - Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
  - Whether you are willing and able immediately to provide transport along the particular route.
  - The capacity deployed and the capacity active on the route as of September 30, 2003.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
No.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
No

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
No

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
No

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable



Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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:
- The RSAG valid address of each customer location.
  - The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
  - 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.
  - Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
  - 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.
  - Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
  - The capacity deployed and capacity activated to the specific location as of September 30, 2003.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC currently has no plans in Kentucky through December 2004.

## Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.).

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

18. Provide a list of all BellSouth wire centers and/or central offices 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:

- The CLLI code of the central office.
- The type of collocation at which the facilities terminate;
- The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- The total active capacity and number of fiber strands deployed as of the most recent date available;
- Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson

Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

24. Identify each shared or non-BellSouth location (e.g., collocation hotel) in Kentucky in which you are located. For each such location state:
- The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
  - 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.);
  - 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).

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.
- 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.
  - For each service identified in (a), list the average monthly revenue associated with each type of service.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

27. Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:
- pick up additional traffic;
  - pick up additional or new customers;
  - pick up additional or new buildings.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response - Responsible Witness:** Amy Dickinson  
Please see attached Interrogatories 1-83 and Request For Production 1-21

Second Set of Interrogatories (1-28) and Second Request for Production of Documents (1-5)

**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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable



**REQUESTS FOR PRODUCTION**

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

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC's tariff is available on the Kentucky PSC's website.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
PAETEC objects on the basis that this information is proprietary and irrelevant to the purpose of this proceeding.

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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).

**PAETEC Response** - Responsible Witness: Amy Dickinson  
N/A

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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)?

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable

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.

**PAETEC Response** - Responsible Witness: Amy Dickinson  
Not applicable