

1-800-RECONEX
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PUBLIC SERVICE
COMMISSION

January 12, 2004

Dorothy J. Chambers
General Counsel-Kentucky
601 West Chestnut Street, Rm 407
P.O. Box 32410
Louisville, KY 40232

Re: *1-800-Reconex, Inc.'s Response to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories and Second Request for Production of Documents;*
PSC 2003-00379

Dear Ms. Chambers:

Enclosed please find 1-800-RECONEX, Inc.'s responses to the above referenced Interrogatories and Data Request. Although RECONEX is a certified competitive local exchange carrier, our Company does not have any loops, switching or transports in Kentucky.

Should you have any questions or need further information, do not hesitate to contact me directly at (503) 982-5585 or via email at jennifer.sikes@reconex.com.

Sincerely,



Jennifer E. Sikes
Paralegal

Enclosures

cc: R. Doug Lackey, Counsel for BellSouth
Meredith E. Mays, Counsel for BellSouth
Service List

Docs/counsel/reports/KY/TrienLtrJan04

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PUBLIC SERVICE
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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)	

1-800-RECONEX, INC.'S RESPONSE TO BELLSOUTH TELECOMMUNICATIONS, INC.'S SECOND SET OF INTERROGATORIES (1-28) AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (1-5).

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: N/A. The response to Question 1 was not in the affirmative.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: N/A. The response to Question 2 was not in the affirmative.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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 provide such transport.

Response: N/A. The response to Question 3 was not in the affirmative.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response.

Response: RECONEX does not self-provide or have deployed any high capacity transport facilities for use in our own operations or offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport anywhere.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: Deny.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

12. If in Question 8 and 10 that 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.

Response: N/A. Neither response in Questions 8 nor 10 were answered in the affirmative.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

13. If in Questions 9 and 11 that 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.

Response: N/A. Neither response in Questions 9 nor 11 were answered in the affirmative.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: None.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

15. List all BellSouth wire centers in Kentucky where you have collocation, either virtual or physical.

Response: None.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

16. Provide a list of all BellSouth wire centers and/or central offices in 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.

Response: N/A. RECONEX has not deployed any high capacity transport facilities anywhere.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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

Response: N/A. There were no central office/wire centers identified in response to Interrogatory No. 16.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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

Response: N/A. RECONEX does not offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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

Response: N/A. RECONEX did not identify any central office/wire centers in response to Interrogatory No. 17.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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, network access point, collocation hotels, data centers, or similar facility.

Response: N/A. RECONEX does not have local network facilities to connect to the networks of other carriers.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: N/A. RECONEX does not have local network facilities to connect to BellSouth's networks.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. RECONEX does not have transports and/or loop facilities.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. RECONEX does not own or control any fiber rings.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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

Response: N/A. RECONEX is a non-facilities based reseller that does not have any loops, switches or transports.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: N/A. There were no arrangement identified in response to Interrogatory 23 or in response to Interrogatory 16.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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.

Response: N/A. RECONEX does not own or control any high capacity loop facilities to deploy.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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

Response: N/A. RECONEX does not have any high capacity loops or transports facilities to extent.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

28. BellSouth incorporates herein its First Set of Interrogatories and First Request for Production of Documents served on 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: Acknowledged.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

REQUESTS FOR PRODUCTION OF DOCUMENTS

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. RECONEX does not have any high capacity transports and/or loop facilities.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. There are no documents identified in response to this Request to produce.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. Documents of this nature do not exist.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. Documents of this nature do not exist.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

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. Documents of this nature do not exist.

Answer supplied by Jennifer Sikes, Paralegal, 1-800-RECONEX, Inc.

Dated this 12th day of January, 2004.



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