

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**RECEIVED**

MAR 02 2004

PUBLIC SERVICE  
COMMISSION

CASE NO.  
2003-00379

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS  
COMMISSION'S TRIENNIAL REVIEW ORDER  
REGARDING UNBUNDLING REQUIREMENTS  
FOR INDIVIDUAL NETWORK ELEMENTS

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**DATA REQUESTS ANSWERS OF THE ELECTRIC AND WATER PLANT BOARD**  
**OF THE CITY OF FRANKFORT**  
**FOR THE IMPAIRMENT OF LOCAL SWITCHING FOR MASS MARKET**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to the Commission's February 9, 2004 Order in this case, hereby serves its Data Requests to The Electric and Water Plant Board of the City of Frankfort ("Frankfort Plant Board"). If your response to both Data Request 1 and Data Request 3 is "none," you do not need to answer the remaining questions. Incorporated by reference are the Instructions and Definitions set out in BellSouth's discovery filed October 10, 2003 and November 24, 2003.

**DATA REQUESTS**

1. Identify each switch owned by Frankfort Plant Board that Frankfort Plant Board uses to provide a qualifying service anywhere in Kentucky, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

**RESPONSE:**

BellSouth does not define what it means by the term "qualifying service". The Frankfort Plant Board (FPB) is providing local telephone service to some residence and business customers. Information regarding the FPB switch is provided in response to Item 2.

2. For each switch identified in response to Data Request No. 1, please:
- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
  - (b) provide the street address, including the city and state in which the switch is located;
  - (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
  - (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
  - (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
  - (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

**RESPONSE:**

- (a) FRFTKY69
- (b) 220 Steele Street, Frankfort , KY
- (c) Nortel DMS-500
- (d) The capacity of the switch is dependent on operational assumptions that are subject to change. As such, total capacity of the switch has not been determined.

- (e) FPB objects to providing its marketing data and sensitive customer specific information since it holds such information as proprietary confidential and a trade secret that is available only to individuals within FPB on a need to know basis. The disclosure of such information would be of value to its competitors in developing market plans that could adversely impact FPB competitive efforts.
  - (f) Information related to the FPB switch is contained in the LERG and is presently available to BellSouth.
3. Identify any other switch not previously identified in Data Request No. 1 that Frankfort Plant Board 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 Data Request, do not include ILEC switches used by Frankfort Plant Board either on an unbundled or resale basis.

**RESPONSE:**

FPB uses no other switch.

4. For each switch identified in response to Data Request 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 Frankfort Plant Board's use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

**RESPONSE:**

See response to Item 3.

5. 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 utilizing any of the switches identified in response to Data Request No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**RESPONSE:**

As previously noted, BellSouth has not defined what it means by a "qualifying service". FPB provides, as its facilities permit, local telephone service primarily in the area of Franklin County Kentucky.

6. For each ILEC wire center area identified in the foregoing Data Request (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 Data Request 1.

**RESPONSE:**

FPB objects to providing its marketing data and sensitive customer specific information since it holds such information as proprietary confidential and a trade secret that is available only to individuals within FPB on a need to know basis.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 6, separate the lines by end user and end user location in the following manner:
  - (a) The number of end user customers to whom you provide one (1) voice grade equivalent line;
  - (b) The number of end user customers to whom you provide two (2) voice grade equivalent lines;
  - (c) The number of end user customers to whom you provide three (3) voice grade equivalent lines;
  - (d) The number of end user customers to whom you provide four (4) voice grade equivalent lines;
  - (e) The number of end user customers to whom you provide five (5) voice grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**RESPONSE:**

See response to Item 6.

8. 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 utilizing any of the switches identified in response to Data Request No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

**RESPONSE:**

See response Item 3.

9. For each ILEC wire center area identified in the foregoing Data Request (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 Data Request No. 3.

**RESPONSE:**

See response Item 3.

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;



- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**RESPONSE:**

See Response to Item 3.

- 11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Kentucky using an ILEC'S switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**RESPONSE:**

FPB does not provide service using an ILEC switch on an unbundled or resale basis.

12. For each ILEC wire center area identified in the foregoing Data Request (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC'S switch either on an unbundled or resale basis.

**RESPONSE:**

See response to Item 11.

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Data Request 12, separate the lines by end user and end user location in the following manner:
  - (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
  - (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
  - (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
  - (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
  - (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**RESPONSE:**

See response to Item 11.

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 Data Request 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 Frankfort Plant Board's provision of switching capability.

**RESPONSE:**

No.

The undersigned verifies that the above answers are correct based on information and belief.

  
Signature

STATE OF KENTUCKY        )  
  )  
COUNTY OF FRANKLIN    )

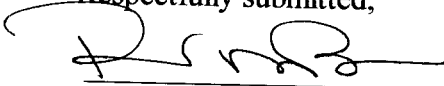
I, the undersigned, a Notary Public in and for the State and County aforesaid, do hereby certify that the foregoing document was presented before me by Ed Hancock who is personally known to me, and I further certify that he signed and acknowledged the same to be his true act and deed in due form of law.

WITNESS, my hand and official this the 2nd day of March, 2004.

  
NOTARY PUBLIC

My Commission Expires 09/16/06

Respectfully submitted,



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