

RECEIVED

MAR 1 2004

PUBLIC SERVICE
COMMISSION

TELEPHONE:

(502) 348-7041

FACSIMILE: (502) 348-7609

THOMAS A. DONAN
ATTORNEY AT LAW

205 E. STEPHEN FOSTER AVE.
POST OFFICE BOX 307
BARDSTOWN, KENTUCKY 40004

February 25, 2004

Mr. Thomas M. Dorman
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Re: Review of Federal Communications Commission's Triennial Review Order
Regarding Unbundling Requirements for Individual Network Elements -
PSC Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the Response of the City of Bardstown Cable T.V., to BellSouth Telecommunications, Inc.'s Data Requests . I have also enclosed ten copies of the Response.

Very truly yours,



THOMAS A. DONAN

TAD/bc

Enclosures

cc: Mayor Dixie P. Hibbs

cc: Mr. Jeff Mills, City Electrical Engineer
Bardstown Cable T.V. Dept.

RECEIVED

MAR 1 2004

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSES TO BELLSOUTH TELECOMMUNICATIONS, INC.'S DATA REQUESTS

Comes the City of Bardstown, operator of City of Bardstown Cable T.V., and for its Response to Bellsouth Telecommunications Inc.'s Data Requests, states as follows:

RESPONSES TO BELLSOUTH TELECOMMUNICATIONS, INC.'S DATA REQUESTS

DATA REQUEST NO. 1

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

purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

RESPONSE: Deny.

DATA REQUEST 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.

RESPONSE: Deny.

DATA REQUEST NO. 3

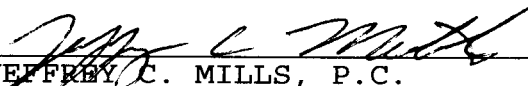
Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in Kentucky. The facilities must terminate to an active physical or virtual collocation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

RESPONSE: Deny.

CITY OF BARDSTOWN D/B/A CITY OF BARDSTOWN CABLE TV



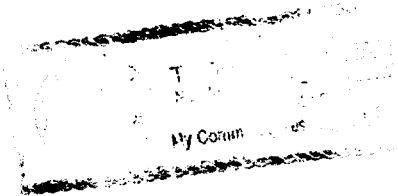
DIXIE P. HIBBS, MAYOR



JEFFREY C. MILLS, P.C.
CITY ELECTRICAL ENGINEER

STATE OF KENTUCKY
COUNTY OF NELSON

Subscribed and sworn to before me by Dixie P. Hibbs in her capacity as Mayor of the City of Bardstown on this 25th day of February, 2004.



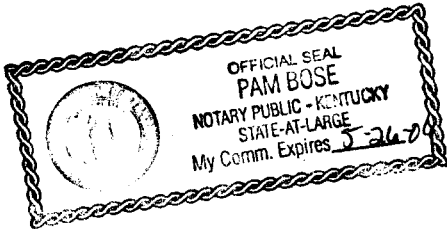
Thomas A. Donan

NOTARY PUBLIC, KY STATE AT LARGE

MY COMMISSION EXPIRES: August 19, 2007

STATE OF KENTUCKY
COUNTY OF NELSON

Subscribed and sworn to before me by Jeffrey C. Mills in his capacity as City Electrical Engineer of the City of Bardstown on this 25 day of February, 2004.



Pamela M. Bose

NOTARY PUBLIC, KY STATE AT LARGE

MY COMMISSION EXPIRES: 5-26-04

Thomas A. Donan

THOMAS A. DONAN
205 East Stephen Foster Ave.
P.O. Box 307
Bardstown, KY 40004
Phone: (502) 348-7041
Facsimile: (502) 348-7609
Attorney for City of Bardstown

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answer to Interrogatories and Request for Production of Documents was served by mailing a true copy of same to the Hon. Dorothy J. Chambers, 601 W. Chestnut Street, Room 407, P.O. Box 32410, Louisville, KY 40232, Counsel for Bellsouth Telecommunications Inc., and Mr. Thomas M. Dorman, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, KY 40602, on this the 25th day of February, 2004.

Thomas A. Donan

THOMAS A. DONAN