

RECEIVED

MAR 5 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

March 2, 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 Impairment of Local Switching for Mass Market -  
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 5 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  
BY THE CITY OF BARDSTOWN D/B/A CITY OF BARDSTOWN CABLE TV FOR THE  
IMPAIRMENT OF LOCAL SWITCHING FOR MASS MARKET**

\*\*\*\*\*

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

**RESPONSES TO BELLSOUTH TELECOMMUNICATIONS, INC.'S DATA REQUESTS  
DATA REQUEST NO. 1**

Identify each switch owned by Bardstown Cable TV and Bardstown Cable TV 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, packet switch, soft switch, host switch, remote switch).

**RESPONSE: None.**

**DATA REQUEST NO. 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 DMS 100);
- (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:**     **None.**

**DATA REQUEST NO. 3**

Identify any other switch not previously identified on Data Request No. 1 that Bardstown Cable TV 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 Bardstown Cable TV either on an unbundled or resale basis.

**RESPONSE: None.**

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

*Dixie P. Hibbs*  
DIXIE P. HIBBS, MAYOR

*Jeffrey C. Mills*  
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 2nd day of March, 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 2nd day of March, 2004.

*Thomas A. Donan*  
NOTARY PUBLIC, KY STATE AT LARGE

MY COMMISSION EXPIRES: August 19, 2007

*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 3rd day of March, 2004.

*Thomas A. Donan*

THOMAS A. DONAN