

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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**PUBLIC SERVICE
COMMISSION**

In the Matter of:

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

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
GENERAL AND SPECIFIC OBJECTIONS TO
MCI WORLDCOM COMMUNICATIONS, INC.'S INITIAL DATA REQUESTS**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following responses and objections to MCI WorldCom Communications, Inc. (hereinafter "MCI") Initial Data Requests dated October 10, 2003, and states as follow:

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced data requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

BellSouth makes the following general objections to MCI's data requests:

1. BellSouth objects to any data request to the extent that such data requests may seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on grounds that such requests are irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by the applicable rules of discovery.

2. BellSouth objects to each and every data request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney client privilege, the work product doctrine, or other applicable privilege.

3. BellSouth objects to each data request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these data requests. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objections.

4. BellSouth objects to each data request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

5. BellSouth objects to providing information to the extent that such information has already been provided, is already within the possession of MCI, or is readily accessible through publicly available means.

6. BellSouth objects to each data request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

7. BellSouth objects to any data requests that seek to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to these data requests will be provided subject to, and without waiver of, the foregoing objection.

8. BellSouth is a large corporation with employees located in many different locations in Kentucky and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of

records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the data requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

1. Please state whether you have any affiliates that are serving mass market customers in Kentucky with the use of their own local circuit switches, or are offering wholesale local circuit switching service to customers serving DS0 capacity loops in Kentucky using their own switches. If your response is affirmative, please identify each such affiliate. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1). For the purpose of this request the term "identify" means to state the full name, address and telephone number of the entity and any names under which it conducts business.

Objection

BellSouth objects to Request No. 1, which seeks affiliate information for the reasons set forth in its General Objection #1. BellSouth also objects to Request No. 1 on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. For each switch identified in response to Request 2 above, please provide the following information:

Switch CLLI Code	Number of Loops Per Customer Premises	Total Number of Local Service Customers	Type of Customer	Number of Voice Only Customers	Number of DSL Only Customers	Number of Voice Plus DSL Customers	Number of Fax or Modem Customers	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	e.g. 50	
	1	e.g. 5.300	Business	e.g. 5,000	e.g. 100	e.g. 100	e.g. 100	
	2		Residential					
	2		Business					
	3		Residential					
	3		Business					
	. . . (continue pattern as above)							
	18		Residential					
	18		Business					
	19-24		Residential					
	19-24		Business					
	one DS-1		Residential					
	one DS-1		Business					
	More than one DS-1		Business					

Objection

BellSouth objects to Request No. 3 on the grounds that it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to Request No. 3 to the extent that it may seek information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth.

7. For each switch identified in response to Request 6 above, please provide the following information:

Switch CLLI Code	Number of Loops Per Customer Premises	Total Number of Local Service Customers	Type of Customer	Number of Voice Only Customers	Number of DSL Only Customers	Number of Voice Plus DSL Customers	Number of Fax or Modem Customers	
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100	e.g. 50	
	1	e.g. 5.300	Business	e.g. 5,000	e.g. 100	e.g. 100	e.g. 100	
	2		Residential					
	2		Business					
	3		Residential					
	3		Business					
	. . . (continue pattern as above)							
	18		Residential					
	18		Business					
	19-24		Residential					
	19-24		Business					
	one DS-1		Residential					
	one DS-1		Business					
	More than one DS-1		Business					

Objection

BellSouth objects to Request No. 7 on the grounds that it seeks information that may not be within BellSouth's possession, custody, or control. BellSouth also objects to Request No. 7 to the extent that it may seek information in a format that is neither maintained in the ordinary course of BellSouth's business nor available to BellSouth.

8. For each CLEC and other carrier collocation arrangement in each BellSouth central office or wire center in Kentucky, please provide the following information, reported by CLLI code and street address:
- (a) name of CLEC or other carrier;
 - (b) type of collocation arrangement (e.g. caged, cageless, virtual, etc.);
 - (c) size of collocation arrangement;
 - (d) amount of power (including both "A" and "B" DC feeds and AC power) supplied to the collocation arrangement;
 - (e) number of 2-wire cross connects currently provisioned from the MDF to the collocation arrangement;
 - (f) number of 4-wire cross connects currently provisioned from the MDF to the collocation arrangement;
 - (g) all equipment installed in the collocation arrangement, including make, model, and total installed capacity for each piece of equipment;
 - (h) type(s) of BellSouth transport connected to the collocation arrangement (e.g., special access, UNE transport, etc.);
 - (i) capacity(ies) of BellSouth transport connected to the collocation arrangement (e.g., DS-1, DS-3, OC-3, etc., and number of circuits at each level of capacity);
 - (j) all non-recurring and recurring charges for the collocation arrangement;
 - (k) name(s) of other collocating carrier(s) to which this collocation arrangement is connected in this central office or wire center.

Objection

BellSouth objects to Interrogatory No. 8 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also

objects to Interrogatory No. 8 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business.

10. For each BellSouth central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, please provide the following information:
- (a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
 - (b) the CLLI code, street address, and V&H coordinates, and owner(s) of the switch(es) to which such EELs are created;
 - (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
 - (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
 - (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
 - (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
 - (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
 - (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

Objection

BellSouth objects to Interrogatory No. 10 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also objects to Interrogatory No. 10 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business.

11. For each BellSouth central office or wire center at which loops and transport are connected to form EELs *without* using collocation, please provide the following information:

- (a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
- (b) the CLLI code, street address, and V&H coordinates, and owner(s) of the switch(es) to which such EELs are created;
- (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
- (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
- (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
- (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
- (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
- (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
- (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

Objection

BellSouth objects to Interrogatory No. 11 on the grounds that it seeks carrier specific, proprietary information that BellSouth is not authorized to provide. BellSouth also objects to Interrogatory No. 11 to the extent that it may seek information in a format that is not maintained in the ordinary course of BellSouth's business.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dorothy J. Chambers", written over a horizontal line.

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