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October 27, 2003

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Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

RECEIVED  
OCT 28 2003  
KENTUCKY PUBLIC SERVICE COMMISSION

**RE: Case No. 2003-00379, CORRECTED FILING**

Dear Mr. Dorman:

Enclosed please find a corrected original and ten copies of AT&T Communications of the South Central States, LLC's ("AT&T") First Set of Interrogatories (NOS. 1-111) and First Request for Production of Documents (NOS. 1-31) to Kentucky ALLTEL and ALLTEL Kentucky (collectively, "ALLTEL").

These requests to ALLTEL were originally filed on October 10. ALLTEL subsequently brought to AT&T's attention some minor numbering errors within the documents. Accordingly, AT&T prepared corrected versions and sent them to ALLTEL. The current filings are REPLACEMENTS for the October 10 filings, including the .pdf versions posted by the Commission and identified on the Commission's electronic filings page for this case as:

Description of Document	File
First Set of Interrogatories (NOS. 1-111) to Kentucky ALLTEL and ALLTEL Kentucky	AT&T Interrogatories ALLTEL 101003.pdf

and

Mr. Thomas N. Dorman  
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Description of Document	File
First Request for Production of Documents (NOS. 1-31) to Kentucky ALLTEL and ALLTEL Kentucky	AT&T DataRequest1 ALLTEL 101003.pdf

For the convenience of parties AT&T requests that these files be identified as "Corrected Versions" when posted on the PSC's website. Parties and interested persons who view the online version of this letter will be able to substitute the corrected versions for those originally filed. To minimize confusion this corrected version has been mailed only to ALLTEL. Other parties receiving electronic notification of filings may choose to print the revised versions upon receiving email notification of this filing from the Commission.

Please indicate receipt of these filings by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely Yours,



Douglas F. Brent  
Counsel to AT&T Communications  
of the South Central States, LLC

DFB:jms

Enc.

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

2003-00379  
OCT 19 2003

In the Matter of:

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

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-31)  
TO ALLTEL ENTITIES  
(KENTUCKY ALLTEL, INC. AND ALLTEL KENTUCKY, INC.)**

AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Kentucky Public Service Commission Order issued in this docket on October 2, 2003, hereby serves its First Request for Production of Documents to ALLTEL Entities (Kentucky ALLTEL, Inc. and ALLTEL Kentucky, Inc. ("ALLTEL")). Also pursuant to that Order, AT&T requests that the following documents be made available for inspection and copying in the AT&T office located at 1200 Peachtree Street, NE, Suite 8100, Atlanta, Georgia, on or before October 31, 2003 or at such time and place as may be mutually agreeable to counsel. In lieu of production for inspection, upon agreement of counsel, ALLTEL may provide copies of all responsive documents to AT&T at the address noted above on or before October 31, 2003.

**DEFINITIONS**

1. "ALLTEL" means Kentucky ALLTEL, Inc. and ALLTEL Kentucky Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of ALLTEL.
2. The terms "you" and "your" refer to ALLTEL.

3. "AT&T" means AT&T Communications of the South Central States, LLC, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of ALLTEL, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving,

dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. “And” and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

10. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

11. “Bulk Hot Cut” refers to any hot cut(s) performed by ALLTEL in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by ALLTEL as a joint migration event or project.

12. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

13. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

14. Unless otherwise stated, information requests refer to the state of Kentucky.

15. Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

16. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

17. "ILEC" refers to Incumbent Local Exchange Carrier.
18. "CO" refers to Central Office.
19. "Coordinated cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch.
20. "Coordinated time-specific cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.
21. "FCC" refers to the Federal Communications Commission.
22. "MDF" refers to Main Distribution Frame.
23. "UNE-L" refers to Unbundled Network Element-Loop.
24. "UNE-P" refers to Unbundled Network Element –Platform.
25. "1996 Telecom Act" refers to the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

### **INSTRUCTIONS**

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within ALLTEL's possession, custody or control as well as in the possession, custody or control of ALLTEL's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and require supplemental responses should additional documents become available.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

- 1) Please produce all documents describing, outlining, or memorializing the process described in ALLTEL's response to Interrogatory No. 2. Documents should include ALLTEL's internal documents and all documents available to CLECs.
  
- 2) Please produce all internal and external documentation, work papers, test related documents, test results, and analysis in ALLTEL's response to Interrogatory No. 3.
  
- 3) With regard to ALLTEL's response to Interrogatory No. 6, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include ALLTEL's internal documents and all documents available to CLECs.

- 4) With regard to ALLTEL's response to Interrogatory No. 7, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include ALLTEL's internal documents and all documents available to CLECs.
  
- 5) Please produce the supporting work papers used in calculating or estimating the percentage described in ALLTEL's response to Interrogatory No. 26.
  
- 6) Please provide a copy of all documents describing the ALLTEL processes identified in ALLTEL's response to Interrogatory No. 36.
  
- 7) Provide all methods and procedures documents, job aids and other materials provided to ALLTEL personnel to use to process service requests for and to provision:
  - (a) Individual hot cuts of loop and number portability.
  - (b) Bulk migrations from UNE-P to UNE-L.

Such documents should include materials provided to ALLTEL personnel in its provisioning and maintenance coordination center, Central Office, field installation personnel and order input center.



- 8) Provide a copy of all documents that set forth ALLTEL's network centers force sizing model process and force models, and all associated instructions.
  
- 9) Provide a copy of all methods and procedures and other documents used to plan and manage the work schedules of CO and field technicians.
  
- 10) Provide copies of all documents which describe the process by which ALLTEL processes multiple vendor orders, e.g. a CLEC using one wholesale provider for switching and another for the loop. Documents should include ALLTEL's internal documents and all documents available to CLECs.
  
- 11) With regard to the documents referenced in Interrogatory No. 43, please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs, studies, or records.
  
- 12) Provide copies of all analysis and work papers used to support the information contained in your answer to Interrogatory No. 44.

- 13) With regard to response to Interrogatory No. 45, please provide all work papers, analysis, studies, reports, etc. that ALLTEL relied upon in reaching the conclusions of that response.
  
- 14) With respect to performance measures that pertain to hot cut performance, including, but not limited to, a Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the required benchmarks.
  
- 15) Provide all documents that refer, relate to, or discuss the loop cutover volume capacity or through-put capability of the current ALLTEL network in Kentucky and all documents that refer, relate to, analyze, or discuss how ALLTEL believes such capacity/capability may be increased.
  
- 16) Referring to Interrogatory No. 50, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and the product, customer and geographic market served by such wholesale provider.


- 17) Referring to Interrogatory No. 49, produce all documents substantiating any assertion that a non-ILEC wholesale circuit switching provider is operationally ready to provide wholesale switching and that such provider and ALLTEL have procedures in place to enable a carrier purchasing a ALLTEL analog loop to provide service of equivalent quality using another non-ILEC carrier's switch.
  
- 18) Referring to Interrogatory No. 49, provide any documents, information, notes, work papers, or communications from the identified company in ALLTEL's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
  
- 19) Referring to Interrogatory No. 51, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self-provider and the product, customer and geographic market served by such self-provider.
  
- 20) Referring to Interrogatory No. 51, provide any documents, information, notes, work papers, or communications from the identified company in ALLTEL's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
  
- 21) Referring to Interrogatory No. 70, if the answer to (c) is in the affirmative, produce all documents that refer, relate to, or discuss ALLTEL's consideration of off-loading such lines to a different local switch.

- 22) Referring to Interrogatory No. 71, if the answer to (a) is in the affirmative, please produce a copy of ALLTEL's switch engineering guidelines.
- 23) Referring to Interrogatory No. 72, please produce all documents describing ALLTEL's FAR guidelines.
- 24) Provide all internal documents that refer, relate to, or discuss the profitability of ALLTEL engaging in UNE-based competition to serve residential and/or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area.
- a) Identify each operational and economic factor ALLTEL believes is appropriate to consider in making a determination whether to implement, continue, expand or curtail any out-of-region local market entry strategy.
  - b) Provide all documents that refer or relate to any operational or economic issue ALLTEL has encountered in any effort ALLTEL has made to implement or expand its out-of-region local market entry strategy.
- 25) Provide all documents that analyze out-of-region local market entry that have been reviewed, considered, or evaluated by ALLTEL regarding entry to serve "mass-market" retail customers using self-provided switching since passage of the 1996 Telecom Act.

- 26) Provide all documents that refer, relate to, or discuss the examination or consideration by ALLTEL whether to lease switching capacity from others as part of its out-of-region local market entry strategy to serve “mass-market” customers.
  
- 27) Provide all documents that refer, relate to, or discuss the examination or consideration by ALLTEL of offering wholesale switching in any out-of-region local market.
  
- 28) Provide all documents analyzing or describing any external “market” for leased local switching capacity that ALLTEL reviewed in evaluating its proposed pricing for de-listed local switching to serve voice grade loops. If no documents were reviewed, explain how ALLTEL established its prices for de-listed local switching was established.
  
- 29) Provide any and all market surveys conducted or other documents and information reviewed by ALLTEL that discuss or address:
  - a) Pricing strategies of competitors offering local switching.
  - b) Product descriptions of competitors’ offerings of local switching for mass-market customers.
  - c) Demand elasticity for local switching.
  - d) Demand projections related to the market for local switching.
  - e) Marketing strategies used by competitors offering local switching to serve mass-market customers.

- 30) Referring to Interrogatory No. 102, please provide a copy of all documents describing ALLTEL processes identified.
- 31) Referring to Interrogatory No. 107, please produce all documents referring or relating to any strategic behavior (pricing offers, advertising campaigns, packaged offerings, waiver of fees, term contract offerings, marketing strategies) ALLTEL has evaluated or implemented in consideration of one or more CLEC's planned or actual entry into a local service market.

Submitted this 10<sup>th</sup> day of October, 2003.



10/27/03

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