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CONNERS
& BERRY, PLC

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September 15, 2000

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Executive Secretary
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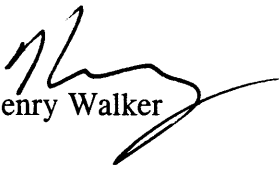
In Re: *Generic Docket to Establish UNE Prices for Lines Sharing per FCC 99-355, and
Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123.*
Docket No. 00-00544

Dear David:

Please find enclosed the original and thirteen copies of the Response to the TRA's Data Request filed on behalf of BlueStar Networks, Inc., Covad Communications Company, Broadslate Networks of Tennessee, Inc. and Vectris Telecom, Inc. in the above-captioned proceeding.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl

c: Parties

POSTED
9-18-00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:	)	
Generic Docket To Establish UNE Prices	)	
for Line Sharing Per FCC 99-355, and	)	Docket No. 00-00544
Riser Cable and Terminating Wire as	)	
Ordered in TRA Docket 98-00123	)	

**RESPONSE OF COVAD COMMUNICATIONS COMPANY, BLUESTAR NETWORKS,
INC., BROADSLATE NETWORKS OF TENNESSEE, INC., AND
VECTRIS TELECOM, INC. TO THE AUTHORITY'S DATA REQUEST**

BlueStar Networks, Inc. ("BlueStar"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), Broadslate Networks of Tennessee, Inc, and Vectris Telecom, Inc. ("Vectris") (collectively, the "DATA Coalition") file this response to the data request of the Tennessee Regulatory Authority ("TRA").

On September 8, the Authority asked the parties to respond to three questions in order to enable the authority to better comprehend the parties positions on the issues in this docket. To respond to those questions, the DATA Coalition has compiled the two, attached charts. The first chart lists costs elements the DATA Coalition believes properly belong in this proceeding either (1) because the element, while properly encompassed in the FCC's 319 rule, is not included in the earlier cost docket ¹ or (2) because the element is at issue in BlueStar's pending arbitration. The second chart lists cost elements for BellSouth that are not properly included in this docket. The question marks on the second chart indicate that the DATA Coalition does not have sufficient information to respond to questions about that element. Since BellSouth is in a

¹ Since several members of the Data Coalition were not participants in the TRA's ongoing Cost Docket No. 97-01262, the Data Coalition has referred to BellSouth's filing from June 9, 2000, which purports to include a list of

better position than any other party to respond to the Authority's questions, the DATA Coalition may also seek leave to respond to BellSouth's answers to the Authority's questions.

cost elements and modifications to those cost elements required by the TRA in that docket. The Data Coalition references a copy of this filing found on the TRA's website.

TABLE 1: Elements Requested by the Data Coalition and Included in FCC UNE Remand 319 Order.

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
A.2.11	Subloop distribution	UNE	§ 51.319(a)(2)		No	
A.2.14-.15	Subloop INC	UNE	§ 51.319(a)(1) (the loop includes “inside wire owned by the incumbent LEC”) and 319(a)(2)(1) (defining inside wire as loop plant owned by the ILEC as afar as the demarcation point)	Riser Cable	No	BlueStar Arbitration Issue
A.2.17,18,21, 24,25,29,30,3 2,40,42	Subloop elements including feeder and distribution	UNE	§ 51.319(a)(2)		No	
A.13.1,7,8,9, 10,11	2 Wire Copper Loop (UCL)	UNE	§ 51.319(a)		No	BlueStar Arbitration

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
						Issue
A.14.1,7,8,9 10,11	4 Wire Copper Loop (UCL)	UNE	§ 51.319(a)		No	BlueStar Arbitration Issue
A.5	Universal Digital Channel (now called the IDSL- Compatible Loop)	UNE (new DSL capable element introduced by BellSouth)	§ 51.319(a)		No	
A.15	Network Terminating Wire	UNE.	§ 51.319(a)(1) (the loop includes "inside wire owned by the incumbent LEC") and 319(a)(2)(1) (defining inside wire as loop plant owned by the ILEC as afar as the demarcation point)	Terminating Wire	No	BlueStar Arbitration Issue

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
A.17.1-6	Loop conditioning	UNE	§ 51.319(a) (loop includes all features, functions and capabilities including line conditioning) See <i>also</i> § 51.319(g)(5)(i)	UNE Remand 319 Order	No	BlueStar Arbitration Issue
J.1.2-3	Dark fiber	UNE	§ 51.319(a)(1) (loops); § 51.319(d)(1)(ii) (interoffice transport)	UNE Remand 319 Order	No	
J.3.1,3,4	Loop makeup	UNE	§ 51.319(g)(pre- ordering function in OSS includes non- discriminatory access to loop makeup information)	UNE Remand 319 Order	No	
J.4.1-4	Line Sharing	UNE	§ 51.319(h)(4)	Line Sharing	No	
H.6.1,2,3,4	RT Collocation:	UNE	§ 51.319(a)(2)	UNE Remand		Not requested by the Data

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
			(iv)	319 Order		Coalition because it is the subject of FCC Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98 (known as the "Next Generation Networks Rulemaking")

TABLE 2: Additional Cost Elements Proposed by BellSouth

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
A.2.13	NID Cross-connect	UNE	§ 51.319(b)	No	?	
A.2.44,45	NID	UNE	§ 51.319(b)	No	Yes	
A.3.12,13,14, 15,16,17,18,1 9,20,21,22	Loop Channelization and Interface	UNE	§ 51.319(a)(1)	No	Yes	
A.5	2 wire ISDN Digital Grade loop	UNE.	§ 51.319(a)(1)	No	Yes	
A.6	2 wire ADSL compatible loop	UNE.	§ 51.319(a)(1)	No	Yes	
A.7	2 wire HDSL compatible loop	UNE.	§ 51.319(a)(1)	No	Yes	
A.8	4 wire HDSL compatible loop	UNE.	§ 51.319(a)(1)	No	Yes	
A.9	4 wire DS1 Digital loop	UNE.	§ 51.319(a)(1)	No	Yes	
A.12	Unbundled Loop	?		No	?	

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
	Concentration					
A.16.1,2,4,5,7 8,10,11,13,15, 16	High capacity unbundled loop	UNE	§ 51.319(a)(1)	No	?	
A.16.3,6,9,12, 14,17.	Manual Service Order Charges	These are not UNEs pursuant to FCC rule § 51.319. Instead these rates are BellSouth's attempt to charge CLECs an inflated charge for manual processing of orders when BellSouth has failed to provide access to unbundled OSS pursuant to § 51.319(g).		No	Yes	
A.19.1-3	Loop testing	<u>NOT A UNE</u>		No		

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
INTEROFFICE TRANSPORT		UNE		No	Yes	
D.5,7,8,10,11, 13,14,16,17,1 9,21,23	Local Channel Dedicated	UNE	§51.319(d)(1)(i)).	No	Related elements priced	
D.5,9,12,15,1 8,20,22.	Manual Service Order Charges	These are not UNEs pursuant to FCC rule § 51.319. Instead these rates are BellSouth's attempt to charge CLECs an inflated charge for manual processing of orders when BellSouth has failed to provide access to unbundled OSS pursuant to § 51.319(g).		No	Yes	

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
D.6.1-2, D.7.1-2, D.8.1-2, D.9.1-2,4 D.10.1,2 D.12.1-2	Interoffice Transport Dedicated	UNE	§51.319(d)(1)(i))	No	Related elements priced	
D.6.3 D.7.3 D.8.3 D.9.3,5 D.10.3 D.12.3	Manual Service Order Charges	These are not UNEs pursuant to FCC rule § 51.319. Instead these rates are BellSouth's attempt to charge CLECs an inflated charge for manual processing of orders when BellSouth has failed to provide access to unbundled OSS pursuant to § 51.319(g)		No	Yes	
E.3.7,8,9,10	CCS7 Signaling	UNE		No	Related	

BellSouth Cost Element	Description	UNE	Citation	Line Sharing, Terminating Wire or Riser Cable	Cost Reviewed in Docket 97-01262	Pricing Pending in Arbitration
					elements priced	
E.4.1,2,3,4,5	CNAM Database Service	UNE		No		
E.5.1,2,3,4,5,6	E911 Service	UNE		No	?	
E.6.1,2,3	LNP Query Service	UNE		No	?	
G.11.1,2,4	Selective Carrier Routing	UNE		No	?	
H.3.1,2,3,4,5, 6	Collocation: Assembly Point	UNE?		No	Related elements priced	
				No		
J.5.1,2,3,4	Access to the DCS	?		No	?	
L.1.1,3	ADUF	?		No	?	
M.1.1	Enhanced Optional DUF	?		No	?	

Respectfully submitted,

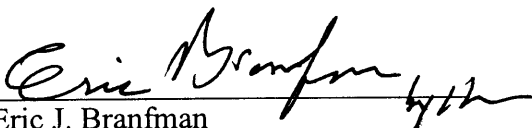
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 15th day of September, 2000.

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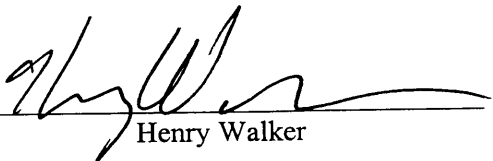
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