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October 16, 2000

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

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

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the non-proprietary portions of BellSouth's Response to Covad's First Interrogatories and First Request for Production of Documents. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH/jem

Enclosure

232317

POSTED 10-17-00

REQUEST: What number of special services lines does BellSouth have in Tennessee?

RESPONSE: BellSouth has approximately 218,000 special service circuits served over copper in Tennessee.

REQUEST: What number of PBX analog circuits designed with load coils does BellSouth have in Tennessee?

RESPONSE: BellSouth has approximately 5,300 PBX analog circuits designed with load coils in Tennessee.

REQUEST: What number of Centrex lines designed with load coils does BellSouth have in Tennessee?

RESPONSE: BellSouth has approximately 6,700 Centrex lines designed with load coils in Tennessee.

REQUEST: What number of ATM lines does BellSouth have in Tennessee?

RESPONSE: As of September, 2000, there were 106 customer connection lines to BellSouth's ATM Service.

REQUEST: What percentage of load points does BellSouth have in Tennessee which are underground in manholes?

RESPONSE: BellSouth is unable to determine the percentage of load points which are underground in manholes in Tennessee. However, in an effort to be responsive, BellSouth states that it has approximately 2.4 million load coils in this environment which would be approximately 47% of BellSouth's network in Tennessee.

REQUEST: What percentage of load points does BellSouth have in Tennessee that are buried facilities?

RESPONSE: BellSouth is unable to determine the percentage of load points in Tennessee which are buried facilities. However, in an effort to be responsive, BellSouth states that it has approximately 1.7 million load coils in this environment which is approximately 33% of BellSouth's network in Tennessee.

REQUEST: What percentage of load points does BellSouth have in Tennessee that are aerial?

RESPONSE: BellSouth is unable to determine the percentage of load points in Tennessee which are aerial. However, in an effort to be responsive, BellSouth states that it has approximately 1 million load coils in this environment which would be approximately 20% of BellSouth's network in Tennessee.

REQUEST: What is the number of BellSouth retail/industrial/consumer ADSL lines in Tennessee?

RESPONSE: We interpret this to be a request for the number of "industrial" class ADSL lines. As of 9/30/00, BellSouth has approximately 9,200 industrial class ADSL lines in Tennessee.

REQUEST: What is the number of BellSouth business ADSL lines in Tennessee?

RESPONSE: We interpret this to be a request for the number of "business class" ADSL lines. As of 9/30/00, BellSouth has 9 business class ADSL lines in Tennessee.

REQUEST: Can a BellSouth industrial/consumer ADSL customer be rolled from an all copper loop to a loop that is copper and fiber?

RESPONSE: Yes.

REQUEST: If so, what provision is made to attempt to continue providing DSL service to those ADSL customers?

RESPONSE: BellSouth will place DSLAM equipment at the remote terminal.

REQUEST: What number of percentage of copper loops under 18,000 feet in Tennessee have load coils?

RESPONSE: BellSouth does not have a mechanized means to retrieve from its databases the requested information.

REQUEST: How many load coils are on each loop identified in No. 12?

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 12. However, any loop under 18 kf that does have load coils will typically be engineered with at least two load coils and could in certain situations have three. Load coil placing rules allow for proper loading if end section plus bridged tap is a minimum of 3,000 feet and a maximum of 12,000 feet.

REQUEST: What number of percentage of copper loops under 18,000 feet in Tennessee have bridged taps longer than 2,500 feet?

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome. BellSouth would have to review plats for information on the nearly 2 million loops in Tennessee and/or perform a separate inquiry for each loop to determine the information.

REQUEST: What is the exact number of cables and length of cable assumed in BellSouth's line sharing cost study?

RESPONSE: BellSouth's line sharing cost study assumed three 100 pair cables for an average distance of 150 feet.

REQUEST: Please describe how BellSouth arrived at the assumption of cable number and length.

RESPONSE: This assumption was based on the method BellSouth assumed the vendor would use to wire the splitter equipment. The length is based on the average distance from the frame where the splitters appear to the CLEC common area, which is the first choice for splitter shelf placement.

REQUEST: How much pulp (by percentage) cable exists in BellSouth's network in Tennessee?

RESPONSE: Approximately 94% of Tennessee's total cable measured in Million Conductor Feet (MCF).

REQUEST: If Covad performs a loop make-up electronically and finds a loop it wants to order, can Covad reserve that loop and buy it as a voice grade SL1 loop?

RESPONSE: No. Currently, BellSouth's electronic Loop Makeup/Facility Reservation Number ("LMU/FRN") process does not apply to SL1 voice grade loops. SL1 voice grade loops are non-designed and typically are used to provide POTS; therefore, the service inquiry process is not required.

CLECs may use BellSouth's LMU Service to determine if the loop queried is capable of supporting xDSL and Unbundled Cooper Loop product offerings. The LMU/FRN option enables a CLEC to receive an LMU and reserve a loop facility.

REQUEST: Will BellSouth perform loop modification (i.e., removal of load coils) on a SL1 loop that Covad orders?

RESPONSE: BellSouth will allow Covad to order an SL1 voice grade loop and perform loop modifications on that loop through the use of the Unbundled Loop Modifications (ULM) process if (1) Covad has the ULM offering in its interconnection agreement and (2) the loop is less than 18,000 feet from the central office. Please note that, if a CLEC orders an SL1 loop and loop modification for such loop, that SL1 loop is still subject to being reassigned to another customer.

REQUEST: Please provide all internal documents that estimate or otherwise budget for the $38,000,000 investment in Telecordia Software. Your complete answer should include any planning documents, budget documents, requisition forms, internal memos, email, etc.

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 20.

REQUEST: If no documents exist in response to question 21 above, please identify the process by which BellSouth intends to invest $38,000.000 without internal planning, budgeting or requisition support documentation. If no such documents exist, please provide rationale for BellSouth's undertaking a $38,000,000 investment (and approximately $500,000 in monthly expenses) without such documentation or associated planning. Your complete answer should include an explanation as to whether such an investment without associated planning is either: extremely rare, rare, common, extremely common or no opinion.

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 20.

REQUEST: Will any of the $38,000,000 investment or corresponding $500,000 monthly maintenance expenses be used to support BellSouth's xDSL services wherein both voice and data services are supplied on the same loop?

RESPONSE: No. The investment is for Operations Support Systems (OSSs) to support Data Local Exchange Carriers (DLECs) in a line-sharing environment.

REQUEST: IF the answer to question 23 above is anything other than an unequivocal yes, please explain in detail why BellSouth will incur this investment and expense solely for use by its competitors when it must also provision a shared line when it provides its own xDSL service to its retail customers directly or through our affiliate.

RESPONSE: BellSouth intends to prepare its Operational Support Systems to support the service requests of the DLECs (Data Local Exchange Carriers) in an efficient manner and on a nondiscriminatory basis. An evaluation of the existing SOEG (Service Order Entry Gateway) system utilized for Information Service Providers (ISPs) and BellSouth's own retail service, determined that it would not meet all of the requirements for DLECs. SOEG is a relatively small and locally developed system that is not capable of processing line sharing requests, providing loop make-up, or other requirements beyond ISP providers. It was developed for wholesale ADSL orders only where BellSouth owns and controls all assets providing its service from the end user Network Interface Device (NID) to the frame relay cloud.

Line sharing for DLECs requires a substantially different approach, since the DLEC now controls the UNE defined as the high frequency portion of the loop. In effect, each loop now has two "owners". The existing operations support system functions that are in place for CLEC service requests are being enhanced to permit DLEC requests for xDSL capable loops and then line sharing. This includes the use of the LSR (Local Service Request) and the electronic ordering capability via TAG, LENS, EDI, RoboTAG™. Pre-ordering, ordering and provisioning processes will be the same for both CLEC and DLEC. BellSouth would, if it established a data affiliate, develop capabilities so that the affiliate's interface with BellSouth were comparable to other DLECs.

Some of the additional systems that require modification to implement this functionality are: Loop Facility Assignment Control System (LFACS), Service Order Analysis and Control (SOAC), SWITCH/ Computer System for Mechanization System (SWITCH/COSMOS), Network and Services Data Base (NSDB), and Work Force Administration Control (WFA-C) and Loop Engineering Information/Loop Electronic Inventory Module (LEIS/LEIM).

REQUEST: Please identify the subject matter expert capable of explaining the Telecordia software investment made for line sharing.

RESPONSE: Ronald M. Pate
Director
BellSouth Telecommunications Inc.
675 West Peachtree Street
Atlanta, Georgia 30375

REQUEST: How many stand alone xDSL loops are currently in place in Tennessee?

RESPONSE: There were 1,855 stand-alone copper xDSL loops in service in TN at the end of August 2000. This includes ADSL, HDSL and UCL loops. There were an additional 1,784 two-wire ISDN loops in service (which may support IDSL service).

REQUEST: Please identify the amount of time BellSouth believes it will take to do the central office work related to provisioning a line shared loop.

RESPONSE:

There are three possible FRAME configurations that can occur in the Central Offices that will impact the amount of time.

Configuration 1 is a single Conventional two sided Frame.

Removal of jumper between the Central Office Line Side Switch Port (OE) and the BellSouth (BS) Cable Pair (CP) wiring blocks, approximately 3-4 minutes

Placement of three jumpers between the following wiring blocks:
BS CP and Splitter, approximately 6 minutes
OE and Splitter, approximately 6 minutes
CLEC CP and Splitter, approximately 6 minutes

Total time for configuration is approximately 21-22 minutes.

Configuration 2 is the use of 2 Frames, a Modular Frame with the BS OE and CP terminations, and a Conventional two sided Frame for the Splitter and CLEC Cable Pair terminations.

The Modular Frame may be either a single or multiple line up. Multiple line up requires the use of Tie Pairs (TP) used to connect the BS CP to the OE resulting in the removal of three jumpers. Each jumper requires approximately 2 minutes for removal.
Modular Frame with single line up, removal of one jumper, approximately 2 minutes.
Modular Frame with multiple line ups, removal of 3 jumpers, approximately 6 minutes.

The placement of the following 5 jumpers:
BS CP and TP, approximately 3 minutes
OE and TP, approximately 3 minutes
CLEC CP and Splitter, approximately 6 minutes
TP and Splitter, approximately 6 minutes (OE TP)
TP and Splitter, approximately 6 minutes (BS CP TP)

RESPONSE: (continued)

Total Time for configuration 2 with a single Modular Frame is approximately 26 minutes.
Total Time for configuration 2 with multiple Modular Frames is approximately 30 minutes.

Configuration 3 is the use of three frames, a single or multiple line up Modular Frame with the BS CP and OE terminations, a Conventional two sided Frame for the Splitters, and a second Conventional two sided Frame for the CLEC CP terminations.

Jumper removal:
Modular Frame with single line up, removal of one jumper, approximately 2 minutes.
Modular Frame with multiple line ups, removal of 3 jumpers, approximately 6 minutes.

The placement of the following 6 jumpers:
BS CP and TP, approximately 3 minutes
OE and TP, approximately 3 minutes
CLEC CP and TP, approximately 6 minutes
TP and Splitter, approximately 6 minutes (OE TP)
TP and Splitter, approximately 6 minutes (BS CP TP)
TP and Splitter, approximately 6 minutes (CLEC CP TP)

Total Time for configuration 3 with a single Modular Frame is approximately 32 minutes.
Total Time for configuration 3 with multiple Modular Frames is approximately 36 minutes.

REQUEST: Once the electronic loop makeup process is functional, will UCLs ordered be designed with any fallout?

RESPONSE: Once BellSouth's electronic loop makeup process has completed beta testing and is placed into production, orders submitted electronically for UCLs should flow through the system although, as with any electronic system, some fallout is possible.

REQUEST: If a loop is found that requires loop conditioning using the electronic process, can loop conditioning be ordered electronically?

RESPONSE: Currently if a CLEC desires loop modification for a particular loop, such request must be submitted to BellSouth through a manual service inquiry.

REQUEST: Does BellSouth build any time into its cost studies for any manual work to assure that there are no BellSouth mistakes from the electronic database?

RESPONSE: Yes. To the extent there are time estimates associated with work performed by the AFIG, which impacts the cost studies through the fallout rate.

REQUEST: Please identify all size splice cases that are used in Tennessee and indicate the percentage of different sizes used by BellSouth in Tennessee.

RESPONSE:

Splice Case	Fiberseal 12B	54.45%
"	12B with pigtail	7.63%
"	Aluminum 20A1	0.00%
"	Aluminum 20B1	3.56%
"	Aluminum 20C1	3.56%
"	Aluminum 20D1	3.05%
"	Aluminum 21A1	4.83%
"	Aluminum 21B1	8.65%
"	Aluminum 21C1	7.63%
"	Aluminum 21D1	6.62%

Copper splice cases: 20- and 21-types range in length from 20 to 26 inches, and in width from 4 to 10 inches.
Designation "A" is for cables with sheath diameters between 0.3 and 1 inch.
"B" = between 1.1 and 1.6 inches
"C" = between 1.7 and 2.2 inches
"D" = between 2.3 and 3 inches.

Above data is based on YTD 2000 ordering.

REQUEST: Does BellSouth's cost study on loop modification assume that every manhole in Tennessee requires time to pump water from the manhole before loop modification work can be performed?

RESPONSE: No. The underground set up (including closing the site) work is based on an average time for all possible situations. The work time does not include an assumption that every manhole requires pumping.

REQUEST: If the answer to Number 30 above is anything but an unequivocal yes, please explain the amount of time estimated for pumping water from a manhole for loop modification and the percentage of manholes BellSouth believes will require such work before loop modification can be performed.

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 33.

REQUEST: In North Carolina, BellSouth's witness Greer testified to the existence of a March 1983 "directive" from AT&T indicating that Revised Resistance Design standards should be used. Please provide a copy of whatever directive BellSouth witness Greer testified about.

RESPONSE: The directive identified by Mr. Greer is attached. This directive was designated as proprietary by AT&T when issued. BellSouth has not received any contrary designation from AT&T.

REQUEST: Please provide a copy of the documents which explain, refer to, authorize or detail the authority of BellSouth engineers to either: (1) proactively load cables with load coils, or (2) proactively unload cables, including but not limited to, any such documents that explain, refer to, authorize or detail the authority of engineers to do so in the 1970s.

RESPONSE: BellSouth has no documents responsive to this request.

REQUEST: Please provide copies of any documents discussing and/or describing the demand for DSL in Tennessee, including but not limited to, any documents that support the demand assumptions made by BellSouth in its loop modification additive assumptions.

RESPONSE: BellSouth is reviewing its files for documents responsive to this request and will supplement this response as soon as possible.

REQUEST: Please provide copies of any studies, notes, and/or work papers that reflect the work associated with how BellSouth arrived at the assumption in the line sharing cost study regarding the number and length of cable.

RESPONSE: Please see BellSouth's cost study, filed October 2, 2000, in this proceeding.

REQUEST: Please provide any information available that identifies how the Telecordia Software Investment/Expense amount included in the UNE Cost Study will be spent. For example, if a portion of the total amount is to be spent updating/enhancing the COSMOS system, please identify that amount and explain the enhancements that must be made. Please account for all of the $38,000,000 Telecordia Software Investment/Expense.

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 20.

REQUEST: Please provide all internal documents that estimate or otherwise budget for the $38,000,000 investment in Telecordia Software. Your complete answer should include any planning documents, budget documents, requisition forms, internal memos, email, etc.

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 20.

REQUEST: Please provide a copy of all contract related to, referring to or concerning any operation support systems upgrades BellSouth is planning or implementing for line sharing, including, but not limited to, any contracts with Telecordia and Andersen Consulting.

RESPONSE: BellSouth has identified documents that are responsive to this request. These documents are highly confidential contracts (and related material) between BellSouth and a third party vendor. BellSouth is not permitted to disclose these documents without written permission from the third party vendor. BellSouth is discussing the possible production of these documents with the third party vendor and reserves the right to further supplement this response.

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

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