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November 14, 2000

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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 responses to Broadslate's First Interrogatories and Requests for Production of Documents. Proprietary portions are being filed under separate cover. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

236160

POSTED 11-14-00

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

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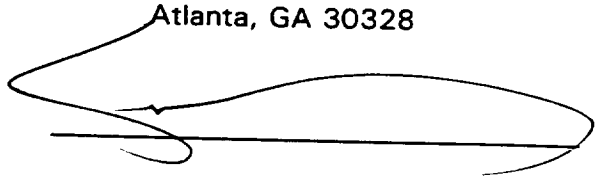

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In 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

BELLSOUTH'S RESPONSES TO BROADSLATE'S 1ST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (SSIM) for connection, testing, and service orders, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: When the dark fiber cost studies were initially developed, dark fiber was not completely defined. Therefore, BellSouth, with no previous basis for work times, chose another high capacity offering on which to base these work times. Provisioning of DS3s was considered to be the nearest service offering that required comparable work activities. For a DS3 service, SSIM does perform the connect and test functions, however, in the provisioning of dark fiber, these activities are performed by outside plant construction.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for central office installation and maintenance circuit and facilities (NTEL) for connection, testing, and service orders and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: The Order is designed in TIRKS then run out of WAFA-DI. BellSouth will then make sure that the fibers to make the cross connect are available. If they are not, new fibers are ordered. If fibers are available BellSouth ensures that they are spare. The cross connect is worked; this may entail having to run a fiber jumper through the fiber troughs depending upon location of cross connect cabinets. The order is then recorded as completed in WAFA-DI.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (travel) (SSIM), for connection and testing and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study

RESPONSE: See BellSouth's response to Broadslate's Revised 1st Interrogatories, Item No. 1.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for access customer advocate center (UNEC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: Tasks for coordination of a Dark Fiber service order within the BellSouth UNE/CWINS Center start with the review of the service order to ensure the order is provisioned as ordered in Service Order Control System and Work Force Administration system. The Center Tester assigned to that order then verifies that the Central Office(s) has completed these work steps and then, dependent on the type of termination requested by the CLEC, ensures measurements are made that verify the circuit meets design requirements. On Due Date, the Tester contacts the CLEC for acceptance, coordinates any cooperative testing requested by the CLEC, then completes the associated service orders.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for customer point of contact (LCSC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: Upon receipt of a clean and accurate LSR and a completed service inquiry, the LCSC time begins. When an LSR is received, the LCSC ensures that all necessary fields are populated. The service representative then validates the ACTL and the BAN to ensure both items are for the designated CLEC. The LCSC then goes to RSAG to validate the ACTL and end user address. They then validate the NCI and secondary NCI codes against data in CDIA. If all necessary information has been provided, is accurate and correct, then the service representative begins the service order process. They manually type in all the loaded information on the LSR and SI into the service order system which is known as EXACT. Once this is completed, they will send the form from EXACT to ICTUF (which allows BellSouth to check the format and ensure that everything is correct). The order is then sent to SOCS and once sent to SOCS, the service representative will validate that the order is error free. If errors exist the service representative will clear the errors and the order will flow downstream to all other BST departments for provisioning. BellSouth will then issue a FOC to the CLEC which will include the circuit id number, order number and due date. If the LSR and SI are not complete and accurate it goes back for clarification.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for circuit provisioning group (CPG) and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: 1st Install

30 minutes (0.5 hrs)

Circuit drops out in CPG for manual design because there are no LFACS assignment. Designer review service order to determine what the problem is. – 10 minutes

Track down the fiber form from OSPE with fiber assignments – 10 minutes

Create the TIRKS WORD document using the information from OSPE – 10 minutes

Additional Install

10 minutes (.1666 hours)

Create the TIRKS WORD document using the information from OSPE – 10 minutes

1st Disconnect

13.5 minutes (.225 hours)

Additional Disconnect

1.27 minutes (.0213 hours)

REQUEST: Please explain in detail the tasks involved with the dark fiber cost input for outside plant engineering (FG30), for engineering and service inquiry, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: The Loop Capacity Manager (LCM) receives a service inquiry request. The LCM would verify facilities in the area by pulling existing records. A contact to the field designer would be made to verify the route of the cable placement in concurrence with the existing records. The designer would also verify if the conduit is available to place the new fiber and space is available for the terminating equipment to be pace. After this information has been determined the LCM answers the Service Inquiry. This process on average would take approximately 3-5 hours.

After the inquiry has been answered the LCM would prepare a handoff package for the designer to do the job. This would include the proper records for the route of the cable. A LEC ticket would be created to order the terminating equipment. The designer receives the handoff package and goes to the field to prepare notes for the cable placement. If a permit is required for placing the cable, it would be prepared and issued to the proper agency. The designer would pull the plats (records of the existing area) and start to CAD the drawings. During this process the designer would create steps for the material required and encode the steps into OSPCM. When this work is complete the designer would route the job for approval. This process would take approximately 5-8 hours minimum depending on the complexity of the work. Depending on the route of the cable, it could take the designer several days to issue the drawings.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for network and engineering planning (FG20) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: This is the work that is involved when the service order enters the system. The CCM is involved in the RMA process from CPG which will cause the CCM to restrict/unrestrict fibers in TIRKS, coordinate with Translation Engineering to possibly certify fibers as usable, build allocation group and planning design in FEPS/TIRKS, coordinate with IP and OSPE again. Some of the steps involved in this process will need to be reworked for the service inquiry process because BellSouth does not reserve facilities. The disconnect work is made up of restricting/unrestricting fibers and making sure the fibers go back in our pool of available inventory.

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for complex resale support group (CRSG) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: See attached.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket 00-00544
BroadSlate Network's Revised First
Set of Interrogatories
November 1, 2000
Item No. 9

ATTACHMENT

CRSG Processing Time per SI
for
Dark Fiber

SD = Systems Designer SI = Service Inquiry					
Cost Element	**Cost Element Component**	**Functions Performed by CRSG**	**Function Performed By**	**INSTALL (Hours)**	**DISC (Hours)**
??	Dark Fiber Service Inquiry	SI receivd from CLEC by email; print & email to SD	Contractor	0.17	0.17
		Logged to BRITE tracking system	Contractor	0.05	0.05
	All of the time & steps shown apply on a PER Service Inquiry (SI) basis For the CRSG, it doesn't matter what size system or Quantity, all work steps & times will be the same. Disconnect times apply ONLY IF CRSG is required to send SI for Disconnect	Assemble printed documents, prepare folder & hand-off to SD	WS10 Clerical or Contractor	0.12	0.12
		SI reviewed & amended, document folder & BRITE	JG56 SD or Contractor	0.25	0.25
		SI faxed to CCM & OSPE	WS10 Clerical or Contractor	0.17	0.05
		SI received from CCM & OSPE by fax; acknowledged & delivered to SD	WS10 Clerical or Contractor	0.25	0.17
		SI reviewed, document folder & BRITE & prepare LCSC Hand-off	JG56 SD or Contractor	0.5	0.25
		SI faxed to LCSC	WS10 Clerical or Contractor	0.05	0.05
		Verify SI received in LCSC; close BRITE & folder	JG56 SD or Contractor	0.17	0.17
		Folder verified & filed in archive	WS10 Clerical or Contractor	0.13	0.13
				1hr. 51min.	1hr. 24min.

Submitted by:
Debbie Timmons
205-321-4990

REQUEST: Please explain in detail the tasks involved with the dark fiber cost study input for circuit capacity management (CCM) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

RESPONSE: These task times are derived from subject matter expert estimates. Tasks involved in the Circuit Capacity Management process for service inquiry include: service inquiry ("SI") for UDF and contact with the SI originator because the SI is usually incomplete or vague. This process also occasionally requires a call with the customer to clarify and also requires coordination with infrastructure planning and OSPE to check for spare. In addition, the service inquiry process also requires research in TIRKS for spare.

REQUEST: Please explain in detail the difference between outside plant engineering and network & engineering planning tasks for dark fiber.

RESPONSE: The outside plant engineer performs two functions with respect to providing dark fiber. First, the OSP engineer determining the availability of spare fibers for the distribution portion of the network between the CO and the end user. This includes not only their physical existence but also what the growth plans were that initially sized the cable and if that forecast is still on target. The network & engineering planning personnel (i.e. a Common Capacity Management (CCM) person) must do the same for the interoffice facilities between BellSouth's Central Offices.

Second, the OSP engineer issues a work order for the work activities done by outside plant construction.

REQUEST: Please explain in detail how BellSouth arrived at the life of the cost element ass 52 months for dark fiber.

RESPONSE: The location life is developed by calculating an average over three years of the location life for Business lines. The computations are provided in file LocLife.xls of directory PUBLIC (or PROPRIETARY)\Recur\INVSTMTS\DEFAULT\TN\ of the CD provided in BellSouth's Cost Study Filing dated October 2, 2000 in this proceeding. The annual life for business lines is calculated by dividing in-service quantities by out-movement lines. A rolling three-year average is then calculated. The average is multiplied by 12 to convert to months.

REQUEST: Please explain in detail why all dark fiber LCSC work times are manual.

RESPONSE: All dark fiber work times are manual because the processing of dark fiber orders are done exclusively with paper forms.

REQUEST: Please describe in detail the process by which BellSouth makes dark fiber UNEs available to CLECs. Your complete response will include the manner of interconnection, the ordering and provisioning process, and any other processes BellSouth must undertake to make dark fiber available.

RESPONSE: Dark Fiber (DF) is optical transmission facilities without attached signal regeneration, multiplexing, aggregation or other electronics that connects two points within BellSouth's network. DF is available to CLECs through an interconnection agreement with BellSouth. Typically requested points are between the CLEC's Point of Presence (POP) and the CLEC's collocation in the CLEC's Serving Wire Center, between the end user's premises and the CLEC's collocation in the end user's Serving Wire Center, between the CLEC's collocation in BellSouth's central offices. DF is terminated on a Light Guide Cross-Connect (LGX) in all locations. CLEC access to DF in the above examples are from the CLEC collocation cross-connect, at the LGX in the CLEC POP or end user premise.

The ordering and provisioning process requires that a Service Inquiry (SI) be submitted requesting the availability of DF between two points. If one of more of the points are collocation arrangements, the collocation arrangements must be identified. The SI must indicate if it is an "inquiry" or "firm order". The SI and the Local Service Request (LSR) may be submitted together or at different times.

The CLEC will send the Dark Fiber SI and Local Service Request (LSR), to the CRSG/Account Team. Upon receipt of the SI and LSR the CRSG/Account Team will forward the SI to Outside Plant and Engineering (OSPE) and Circuit Capacity Management (CCM). If both ends of the request are at POP and/or collocation, only CCM will receive the SI. OSPE/CCM will check the availability of DF and will calculate the number of miles between the two points. OSPE/CCM will also provide the Due Date when the service can be provided as well as define the location of the DF terminations. OSPE/CCM will forward the SI and LSR to the CRSG/Account Team.

RESPONSE: (continued)

If the service is available, the CRSG/Account Team will advise the CLEC. If the service is available and the SI was an 'inquiry", the CLEC can either accept or reject the results of the SI. If CLEC accepts the SI results, then a "firm order" SI and the LSR will be forwarded to the LCSC. Upon receipt of the "firm order" SI and LSR, the LCSC Service Rep will start the service order process. If CLEC submits both the "firm order" SI and LSR at the same time and the service is available, Network will proceed with all pre-service provisioning and upon notification from Network, the LCSC will start the ordering process. . If CLEC submits both the "firm order" SI and LSR at the same time and the service is not available then the CRSG/Account Team will advise the CLEC and the SI and LSR will be canceled.

If the SI is not complete and the LCSC needs additional information, the SI and LSR are returned to the CRSG/Account Team to provide the needed information. If the LSR is incorrect or invalid, then the LCSC Service Rep will send a clarification notification to the CLEC.

REQUEST: In 1999, how many service orders for BellSouth's retail services in Tennessee (i.e., non-UNEs or resale facilities) required conditioning activities to provision?

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: How many BellSouth service orders pertaining to BellSouth's retail service does BellSouth anticipate will require conditioning activities? Please provide this information for the following timeframes: 2000, 2001.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the total number of ISDN-PRI circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date)

RESPONSE: Set forth below is the total number of ISDN-PRI circuits in-service for CLECs in Tennessee at year end 1998, year end 1999 and as of October 31, 2000, respectively.

	1998	1999	2000YTD
PRI	1,888	3,621	4,958

REQUEST: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the total number of ISDN-BRI circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

RESPONSE: Set forth below is the total number of ISDN-BRI circuits in-service for CLECs in Tennessee at year end 1998, year end 1999 and as of October 31, 2000, respectively.

	1998	1999	2000YTD
BRI	23,879	27,684	28,519

REQUEST: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the total number of T-1 or DS-1 circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

RESPONSE: Set forth below is the total number of DS-1 circuits in-service for CLECs in Tennessee at year end 1998, year end 1999 and as of October 31, 2000, respectively.

	1998	1999	2000YTD
DS1	20,552	29,457	36,991

REQUEST: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the total number of digital circuits below T-1 capacity (e.g., 64 kbps, 56 kbps, etc.) sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

RESPONSE: Set forth below is the total number of DS0 circuits in-service for CLECs in Tennessee at year end 1998, year end 1999 and as of October 31, 2000, respectively.

	1998	1999	2000YTD
DS0	19,819	20,954	22,766

REQUEST: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth does not have an electronic method in place to track the requested information. Therefore, BellSouth cannot provide a response to this request unless it conducts a manual review of its service orders and other records. That process would take at least three months to complete.

REQUEST: Please provide the total amount of expense BellSouth booked for conditioning activities (i.e., removing load coils, removing bridged tap or removing repeaters and/or other devices disruptive to digital services) in 1998, 1999, and year to date 2000.

RESPONSE: BellSouth does not maintain its accounting records in a manner which would permit it to provide the detailed information sought by this request. While BellSouth records the dollars (whether capital or expense) associated with an outside plant construction job, a job often includes many tasks and determining the cost incurred by the actual "conditioning" may not be separable from other tasks. Also, even the identification of those jobs that included the removal of some portion of the plant, is dependent on the verbiage the engineer stated in the title of the job and therefore capturing all the relevant jobs would be unlikely.

REQUEST: How many load coils are currently placed in BellSouth's Tennessee network?

RESPONSE: BellSouth currently has approximately 5.1 million load coils in its network in Tennessee.

REQUEST: How many load coils identified in response to the question above are housed in underground, manhole environments?

RESPONSE: See BellSouth's Response to Covad's 1st Interrogatories, Item No. 5.

REQUEST: Please admit or deny that BellSouth's employees in Tennessee utilize electronic maps of BellSouth's facilities in performing their job functions.

RESPONSE: Denied.

REQUEST: If the answer to the question above is anything other than an unequivocal "Deny," please list each such database used by BellSouth employees. Your complete answer will include a description of each database and the primary function it serves for BellSouth's employees.

RESPONSE: See BellSouth's Response to Broadslate's Revised 1st Interrogatories, Item No. 29.

REQUEST: When a CLP requests loop makeup information on a loop whose information is not currently included in the Loop Facilities Assignment Control System (LFACS) and Manual Loop Makeup activities are required (and a Manual Loop Makeup charge is assessed), is the information obtained from that Manual Loop Makeup inquiry then entered into LFACS such that loop can be accessed via the mechanized loop makeup process in the future?

RESPONSE: Yes. Whenever the BellSouth Outside Plant Engineer ("OSPE") receives a request for loop makeup and not all of the detailed information resides in LFACS, the OSPE will first respond to the loop makeup request and then update LFACS with the detailed information obtained from the manual loop makeup inquiry. This update will ensure that future loop makeup queries for this particular loop can be accessed electronically.

REQUEST: Please describe in detail how BellSouth created the technical specification for the UCL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had , or currently have, to request changes to those technical specifications.

RESPONSE: The technical specifications for all unbundled local loop offerings were developed taking into account the embedded plant, BST's internal loop performance specifications, and the loop design standards reflecting the millions of loops in BST's network.

The technical specifications of BellSouth's Unbundled Loop offerings have been published in the TR73600 Unbundled Local Loop – Technical Specifications document since March of 1997. This document has been revised from time to time to reflect new unbundled loop offerings and to clarify the specifications.

Discussions between CLECs and BellSouth regarding our unbundled offerings have resulted in changes to the above-mentioned TR. A public forum (much like an industry standards forum) does not exist in which both BellSouth and the CLECs are jointly developing unbundled local loop specifications. At this time, these specifications are not being developed, to our knowledge, in any industry standards forum. If such an effort were initiated, BellSouth would be eager to participate.

REQUEST: Please describe in detail how BellSouth created the technical specification for the ADSL loop, how these specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.

RESPONSE: The technical specifications for all unbundled local loop offerings were developed taking into account the embedded plant, BST's internal loop performance specifications, and the loop design standards reflecting the millions of loops in BST's network.

The technical specifications of BellSouth's Unbundled Loop offerings have been published in the TR73600 Unbundled Local Loop – Technical Specifications document since March of 1997. This document has been revised from time to time to reflect new unbundled loop offerings and to clarify the specifications.

Discussions between CLECs and BellSouth regarding our unbundled offerings have resulted in changes to the above-mentioned TR. A public forum (much like an industry standards forum) does not exist in which both BellSouth and the CLECs are jointly developing unbundled local loop specifications. At this time, these specifications are not being developed, to our knowledge, in any industry standards forum. If such an effort were initiated, BellSouth would be eager to participate.

REQUEST: Please identify BellSouth's subject matter expert(s) for line sharing operation support systems updates, including the person(s) who can explain with specificity the cost of the project, the type of upgrades required the functionality of the upgrades, the work activities necessary to complete the upgrade, the work activities necessary to maintain the upgrades, the type of employees/consultants BellSouth will use for completing and maintaining the upgrades, and the extent to which these upgrades benefit other BellSouth operations (including retail) or UNE products other than line sharing.

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

REQUEST: Please describe in detail any additional costs associated with BellSouth's use of the bantam test jack for CLEC line sharing splitter, including the specific amount of additional costs, where those costs are found the line sharing cost study, and the work activities and personnel associated with those costs.

RESPONSE: The additional cost for test access is $1,670 per 96-line splitter. The cost is included in the cost for a line sharing splitter provided on the INPUT_Recur worksheet, lines 28 and 50 (see file TNLineSH.xls in directory PROPRIETARY\Recur\INVSTMTS\DEFAULT\TN\ of the proprietary CD provided in BellSouth's Cost Study Filing dated October 2, 2000 in this proceeding). The installation work activity is developed thought the application of the inplant factor to the material price. The work time for testing is included in Cost Element J.4.398 on a per line basis (see file TNLineSH, worksheet INPUT_NRC, lines 39 to 42).

REQUEST: Please provide any documentation provided to BellSouth's employees explaining the BellSouth Corporate Facilities Database or any other database that houses electronic maps of BellSouth's outside plant facilities in Tennessee.

RESPONSE: In some areas in Tennessee, Outside Plant Engineering has chosen to make photocopies of the outside plant records/maps and store them in a digitized form. This form does not constitute a "database" but merely another optical record. Therefore, the only documentation relevant to the use of this form of the map is the same as that which pertains to the use of the original paper form.

REQUEST: To the extent the invoices would differ, please provide BellSouth's five most recent invoices for purchasing splitters used by BellSouth to provision its FastAccess DSL service or any other retail/wholesale ADSL offering.

RESPONSE: Because, in their FastAccess offering, BellSouth is responsible for both voice and ADSL, the architecture involves splitters which are integrated with the DSLAM.

Since BellSouth is responsible for the voice quality on a Line Sharing circuit, BellSouth elects to employ a "stand-alone" splitter. This arrangement allows us to have "end-to-end" control over the voice circuit, i.e., the voice circuit is not routed through the CLEC's equipment, as it is in the case of FastAccess.

In summary, neither the architecture nor the splitters employed in Line Sharing are the same as those used with FastAccess.

REQUEST: Please provide a copy of any contract or agreement that governs the rates, terms and/or conditions by which BellSouth purchases the splitter equipment discussed in the question above.

RESPONSE: N/A.

REQUEST: Please provide any and all agreements in effect within the past 4 years, between BellSouth and any telecommunications contractor relating to the placement, rearrangement repair, removal or provisioning of outside plant facilities.

RESPONSE: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the aforementioned objection, BellSouth will make available to Broadslate for inspection and review copies of responsive documents at a mutually convenient time and place.

REQUEST: Please provide copies of any collective bargaining agreements, other employment agreements, or other documents that detail the terms, conditions, or rules by which BellSouth employees undertake the placement rearrangement, repair, removal or provisioning of outside plant facilities, including specifically any such documents which prohibit anyone other than BellSouth employees from performing these tasks.

RESPONSE: BellSouth will make available to Broadslate for inspection and review copies of responsive documents at a mutually convenient time and place.