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September 10, 2002

Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: *Petition of Tennessee UNE-P Coalition to Open a Contested Case
Proceeding to Declare an Unrestricted Unbundled Network Element*
Docket No. 02-00207

Dear Director Jones:

On behalf of the UNE-P Coalition, I am writing to you in your capacity as Hearing Officer in the above-captioned proceeding. As you know, BellSouth Telecommunications, Inc. ("BellSouth") served discovery on a number of competitive, local exchange carriers which are not parties to this case. In an order issued June 28, 2002, Hearing Officer Melvin J. Malone ruled that the TRA would not compel the non-parties to respond to BellSouth's requests but that "the Authority should promulgate data requests" to those carriers. Order, at 16

If and when the Authority issues those data requests,¹ the UNE-P Coalition suggests that the information will be of more use to the Authority if, in addition to the questions drafted by BellSouth, the Authority asks the CLECs to respond to the following:

1. [same questions as drafted by BellSouth].

(g) Divide the total number of lines provided in the response to request (f) into the following three categories: number of analog lines, number of DS1 lines, and the number of DS3 (or above) lines.

(h) If the total number of voice grade equivalent lines assigned to each category in (g), using conventional conversion ratios of 24:1 for DS1 and 672:1 for DS-3, is different than the number of voice grade equivalent lines provided in response to question (f) please explain the discrepancy.

¹ To the knowledge of the UNE-P Coalition, the Authority has not yet issued any such data requests, presumably because the Hearing Officer has not yet ruled on BellSouth's pending "Motion to Hold Proceeding in Abeyance" or the Coalition's pending "Motion for Clarification or Reconsideration."

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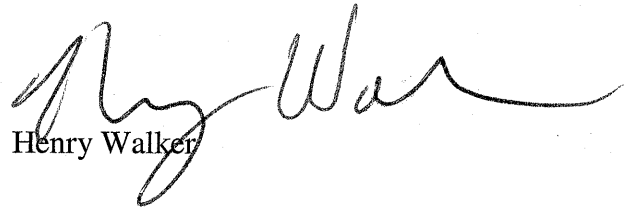
(i) provide that the total number of analog line cards (*i.e.*, ports capable of serving an analog voice circuit) are configured (*i.e.* currently installed and capable of providing analog service) on each switch.

The Coalition believes that this additional level of detail will make the information provided by the CLECs more helpful to the parties and to the Authority in resolving this docket

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

A handwritten signature in dark ink, appearing to read "Henry Walker", written over the printed name.

Henry Walker

HW/nl

c: All parties