

# TENNESSEE REGULATORY AUTHORITY



Sara Kyle, Chairman  
Deborah Taylor Tate, Director  
Pat Miller, Director  
Ron Jones, Director

460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

September 18, 2002

Mr. Brent McMahan  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501

Dear Mr. McMahan:

To assist the Authority in its evaluation of Docket 02-00207, *Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element*, it is requested that you respond to the following questions. Pursuant to the September 13, 2002 *Order Denying Motion to Hold Proceeding in Abeyance and Granting Motion For Reconsideration Or Clarification*, responses to this data request are to be filed in accordance with the provisions of the *Initial Order Resolving Discovery Disputes* ("Discovery Order") issued on June 28, 2002. The *Discovery Order* maintains that companies that are not parties to the this proceeding should file two responses to this request: a Proprietary Version and a Redacted Version. Per the *Discovery Order*, the Proprietary Version of your response "shall be filed in a sealed envelope, shall contain on the outside of the envelope a designation that the information is protected pursuant to the terms of this order, shall be maintained in the Office of the Executive Secretary, and shall be available only to members of the Authority."<sup>1</sup> Concerning the Redacted Version of your response, the *Discovery Order* states that a "non-party may redact only its name and any other identifying information such as its address, phone number, and attorney. The Redacted Version shall be filed in the Office of the Executive Secretary and shall be served on all parties to this docket."<sup>2</sup>

1. Identify each switch that you own or operate to provide local exchange service in the State of Tennessee, including, but not limited to, switches outside Tennessee. In answering this request, please describe with particularity for such switch:
  - (a) the specific location of the switch;
  - (b) the functions and capabilities of the switch;
  - (c) the geographic area served by the switch;

<sup>1</sup> *Discovery Order* at 16.

<sup>2</sup> *Discovery Order* at 16.

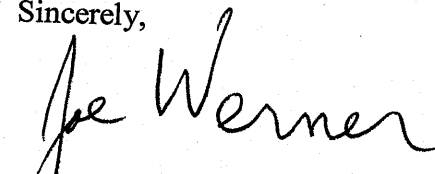
- (d) the total number of access lines or equivalent lines the switch is capable of serving;
  - (e) the total number of access lines or equivalent lines the switch is currently serving;
  - (f) divide the total number of lines provided in the response to request (e) into the following three categories: number of analog lines, number of DS1 lines, and the number of DS3 (or above) lines; and
  - (g) if the total number of voice grade equivalent lines assigned to each category in (f), using conventional conversion ratios of 24:1 for DS1 and 672:1 for DS3 is different from the number of equivalent lines provided in response to question (e) please explain the discrepancy.
2. State the total number of switching points of interface you have deployed in the State of Tennessee for the collection of traffic associated with local exchange service and identify the location of each such switching point of interface.
3. Do you currently provide local exchange service to end-user customers in Tennessee with less than four voice grade (DS0) equivalents or lines? If the answer to this question is affirmative, state:
- (a) the total number of end user customers with less than four voice grade lines or equivalents currently served;
  - (b) the number of such access lines or equivalent lines that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA;
  - (c) the number of such access lines or equivalent lines that you currently serve in Tennessee using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth; and
  - (d) the number of such access lines or equivalent lines that you currently serve in the "density zone 1" central offices in the Nashville MSA using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.
4. Do you currently provide local exchange service to end-user customers in Tennessee with four or more voice grade (DS0) equivalents or lines? If the answer to this question is affirmative, state:
- (a) the total number of end-user customers with four or more voice grade (DS0) equivalent or lines currently served;
  - (b) the total number of end-user customers with four or more voice grade (DS0) equivalents or lines currently served by you that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA; and
  - (c) the total number of end-user customers with four or more voice grade (DS0) equivalents or lines currently served by you using: (i) facilities purchased exclusively from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your

own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.

5. Have you purchased switching from a telecommunications carrier other than BellSouth in providing local exchange service to end-user customers? If the answer to this question is affirmative, name the provider(s) of switching.
6. If the response to question 5 (above) is negative, please:
  - (a) state whether you have ever investigated or otherwise considered purchasing switching from a carrier other than BellSouth, and, if so, the results of such investigation or consideration;
  - (b) state whether you have ever request switching from a carrier other than BellSouth, and, if so, the reason for such request and the reasons why you decided not to purchase switching from such carrier.
7. Identify carriers other than BellSouth, of which you are aware, that offer switching in Tennessee.
8. State all carriers that have purchased switching from you in Tennessee.
9. Identify all carriers that have made inquiries to you regarding the purchase of switching in Tennessee.

Please furnish your response to this data request by Wednesday, September 25, 2002. If you have any questions in reference to this request, contact Jerry Kettles at (615) 741-2791, extension 153.

Sincerely,



Joe Werner  
Chief, Telecommunications Division  
Tennessee Regulatory Authority