

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE:

PETITION FOR EXEMPTION OF
CERTAIN SERVICES

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T.R.A. DOCKET ROOM

DOCKET NO. 03-00391

**CONSUMER ADVOCATE AND PROTECTION DIVISION'S RESPONSE TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION TO COMPEL
RESPONSES TO ITS FIRST SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Paul G. Summers, Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), respectfully submits its response to the motion to compel filed in the above-referenced matter by BellSouth Telecommunications, Inc. ("BellSouth") on August 30, 2004.

Following are the Consumer Advocate's responses to BellSouth's objections for Interrogatory Nos. 6 and 9:

Interrogatory No. 6

BellSouth's Interrogatory No. 6: Please identify and describe with specificity any way in which you believe that the market in Tennessee for PRI service is different than the market in other states for PRI service.

Consumer Advocate's Discovery Response: The Consumer Advocate objects to this interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this docket. In particular,

potential differences between the PRI service market in Tennessee and the PRI service market in other states have no bearing on whether PRI service should be exempted from certain regulatory requirements pursuant to Tenn. Code Ann. § 65-5-208(b).

BellSouth's Objection: BellSouth moves to compel on the basis that the interrogatory seeks to elicit information that would be relevant to the determination of the competitive nature of PRI in Tennessee. Comparison of this market to markets elsewhere in the United States may provide useful information on which the TRA may base its decision about whether the competitive nature of PRI service in Tennessee is sufficient to merit relief under this statute.

Consumer Advocate's Response to BellSouth's Objection: The Consumer Advocate maintains its objection to this interrogatory. Without waiving this objection, the Consumer Advocate states the following: To the extent BellSouth seeks to discover information or documents in the possession of the Consumer Advocate, the Consumer Advocate has attached hereto all the information and documents in its possession regarding the PRI service markets of other states. In accordance with the Rules of Civil Procedure, the Consumer Advocate will supplement its response to this interrogatory should it gather additional information regarding the PRI service markets of other states and/or should its analysis of pertinent information lead it to believe that the market in Tennessee for PRI service is different than the market in other states for PRI service.

Interrogatory No. 9

BellSouth's Interrogatory No. 9: Please identify all services that you believe provide end users with similar functionality to that provided by PRI.

Consumer Advocate's Discovery Response: The Consumer Advocate objects to this

interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this docket. In particular, potential differences between PRI service and other services that may provide end users with similar functionality to that provided by PRI have no bearing on whether PRI service should be exempted from certain regulatory requirements pursuant to Tenn. Code Ann. § 65-5-208(b). The Consumer Advocate further objects to this interrogatory on the ground that it is vague, overly broad, imprecise, or uses terms that are subject to multiple interpretations. In particular, the term “similar functionality” is not properly defined or explained for purposes of this interrogatory.

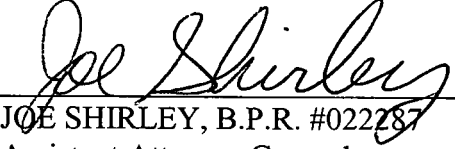
BellSouth’s Objection: BellSouth objects that the Consumer Advocate’s response is inadequate. The question is reasonable calculated to lead to the discovery of admissible evidence in that it seeks to obtain information that could be used to describe or define the market for services in Tennessee at issue in this docket. The TRA has often recognized the importance of “intermodal competition”, that is, competition using different technologies to provide customers with similar or the same services. The interrogatory is designed to elicit any information the Consumer Advocate has about other services that may provide similar functions to customers and also is relevant to the issues that will be considered in this docket. The term “similar functionality” is used in the ordinary matter, is not a term of art, and is therefore not confusing.

Consumer Advocate’s Response to BellSouth’s Objection: The Consumer Advocate maintains its objection to this interrogatory. Without waiving this objection, the Consumer Advocate states the following: To the extent BellSouth seeks to discover information or documents in the possession of the Consumer Advocate, the Consumer Advocate states that it does not have any information or documents that are responsive to this interrogatory. In

accordance with the Rules of Civil Procedure, the Consumer Advocate will supplement its response to this interrogatory should it gather information or documents regarding services that it believes provide end users with similar functionality to that provided by PRI.

RESPECTFULLY SUBMITTED,

PAUL G. SUMMERS, B.P.R. #6285
Attorney General and Reporter



JOE SHIRLEY, B.P.R. #022287
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
(615) 532-2590

Dated: September 8, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via first-class U.S. Mail, postage prepaid, on September 8, 2004, upon:

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BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
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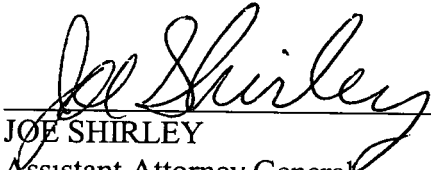
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JOE SHIRLEY
Assistant Attorney General

78559

TRA Docket #03-00391
BellSouth PRI ISDN Control Channels

<u>State</u>	(1) <u>1999</u>	(2) <u>2001</u>	(3) <u>2003</u>	(4) <u>Growth</u>	(5) <u>% Growth</u>
Alabama	3,167	5,264	4,924	1,757	55 48%
Florida	9,312	14,561	14,668	5,356	57 52%
Georgia	6,539	11,272	11,238	4,699	71 86%
Kentucky	1,263	2,831	3,122	1,859	147 19%
Louisiana	3,426	5,288	5,014	1,588	46 35%
Mississippi	1,477	3,197	3,231	1,754	118 75%
North Carolina	4,220	6,089	5,382	1,162	27 54%
South Carolina	2,329	3,792	3,746	1,417	60 84%
Tennessee	4,379	7,118	6,341	1,962	44 80%
Total	36,112	59,412	57,666	21,554	59 69%

Source FCC Report 43-08 ARMIS Operating Data Report

Column (4) is the difference between Column (3) and Column (1) amounts.

Column (5) is the percent of Column (4) to Column (1)

TRA Docket #03-00391

BellSouth PRI ISDN Control Channels

	(1) <u>1999</u>	(2) <u>2001</u>	(3) <u>2003</u>	(4) <u>Growth</u>	(5) <u>% Growth</u>
<u>State</u>					
Alabama	3,167	5,264	4,924	1,757	55 48%
Florida	9,312	14,561	14,668	5,356	57 52%
Georgia	6,539	11,272	11,238	4,699	71 86%
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Column (5) is the percent of Column (4) to Column (1)

Annual Reports ARMIS 43-02 and 43-08

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COMPTROLLER OF THE TREASURY
OFFICE OF STATE ASSESSED PROPERTIES

ANNUAL REPORT

OF

BELLSOUTH TELECOMMUNICATIONS, INC.

ATLANTA, GA

TO THE

FEDERAL COMMUNICATIONS COMMISSION

FOR THE

YEAR ENDED DECEMBER 31, 2003

COMPANY BELLSOUTH TELECOMMUNICATIONS, INC
STUDY AREA ALL
PERIOD From JAN 2003 TO DEC 2003
COSA BSTR

Unrestricted Version
SUBMISSION 1
TABLE B-6
PAGE 1 OF 1

TABLE B-6 - SUMMARY OF INVESTMENT AND ACCUMULATED DEPRECIATION BY JURISDICTION
(Dollars in Thousands)

		Telephone Plant Before Amortizable Assets (Accounts 2110 through 2441)					
Row No	Description (a)	Telephone Plant Beginning Balance (b)	Telephone Plant Additions (c)	Telephone Plant Retirements w/Traffic (d)	Telephone Plant Retirements w/o Traffic (e)	Other Charges and Credits (f)	Telephone Plant Ending Balance (g)
0110	Alabama	5,274,919	209,876	0	202,618	35,750	5,317,927
0200	Florida	14,069,634	511,885	0	461,230	183,221	14,303,510
0210	Georgia	12,143,685	565,010	0	296,510	44,844	12,457,029
0280	Kentucky	3,046,997	115,011	0	69,156	20,938	3,113,790
0290	Louisiana	5,377,995	170,356	0	112,876	28,162	5,463,637
0350	Mississippi	3,633,972	175,686	0	158,847	31,830	3,682,641
0440	North Carolina	6,265,636	227,201	0	178,078	110,906	6,425,665
0510	South Carolina	3,720,578	135,408	0	100,513	33,772	3,789,245
0530	Tennessee	6,009,676	207,501	0	189,953	47,627	6,074,851
0910	Total	59,543,092	2,317,934	0	1,769,781	537,050	60,628,295

		Accumulated Depreciation (Account 3100)							
Row No	Description (a)	Beginning Balance (h)	Depreciation Accruals (i)	Gross Salvage (j)	Cost of Removal (k)	Other Charges and Credits (l)	Ending Balance (m)	Beginning Ratio (n)	Ending Ratio (o)
0110	Alabama	3,088,497	361,926	5,121	9,986	-122,345	3,323,213	58 55	
0200	Florida	8,626,707	965,151	15,611	16,236	-268,490	9,322,743	61 31	
0210	Georgia	6,415,537	839,717	20,886	16,865	-210,480	7,048,795	52 83	
0280	Kentucky	1,851,925	209,476	1,394	5,758	-45,154	2,011,883	60 78	
0290	Louisiana	3,616,270	343,655	1,858	7,639	-75,693	3,878,451	67 24	
0350	Mississippi	2,316,267	276,479	5,528	6,124	-108,966	2,483,184	63 74	
0440	North Carolina	3,722,059	451,224	3,411	8,834	-104,685	4,063,175	59 40	
0510	South Carolina	2,317,434	256,116	1,988	3,900	-64,860	2,506,778	62 29	
0530	Tennessee	3,513,313	410,629	2,856	9,135	-128,339	3,789,324	58 46	
0910	Total	35,468,009	4,114,373	58,653	84,477	-1,129,012	38,427,546	59 57	

Port 43-08
OPERATING DATA REPORT

BY. BellSouth Telecommunications, Inc.
AREA All
From Jan 2003 To Dec 2003
BSTR

UNRESTRICTED VERSION
SUBMISSION 1
TABLE II
Page 1 of 2

TABLE II - SWITCHED ACCESS LINES IN SERVICE

STATE OR TERR (ca)	Code (cb)	Main AccessLines (cc)	PBX and Centrex Trunks (cd)	Centrex Extensions (ce)	Other Switched Access Lines (ci)	Total Switched Access Lines (cj)
Alabama	AL	1,489,162	47,135	86,900	22,778	1,645,975
Florida	FL	5,168,445	152,221	222,784	60,174	5,603,624
Georgia	GA	2,903,095	118,504	308,513	36,873	3,366,985
Kentucky	KY	929,957	28,804	53,303	13,607	1,025,671
Louisiana	LA	1,806,208	54,363	125,573	27,405	2,013,549
Mississippi	MS	1,021,019	31,798	64,335	27,798	1,144,950
North Carolina	NC	1,908,681	59,546	187,125	24,361	2,179,713
South Carolina	SC	1,182,929	37,923	76,494	22,739	1,320,085
Tennessee	TN	2,143,632	59,552	71,033	20,999	2,295,216
Total	TO	18,553,128	589,846	1,196,060	256,734	20,595,768

State Row Numbers and Codes Reference Table for the row numbers and the state codes
applicable to your filing and for the correct order in which the rows shall appear)

FCC Report 43-08
ARMIS OPERATING DATA REPORT

COMPANY BellSouth Telecommunications, Inc
STUDY AREA All
PERIOD From Jan 2003 To Dec 2003
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UNRESTRICTED VERSION
SUBMISSION 1
TABLE II
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TABLE II - SWITCHED ACCESS LINES IN SERVICE BY TECHNOLOGY

ROW NO	STATE OR TERR (ca)	Code (cb)	Central Office Switches Excluding Remotes (ck)	Remote Switches (cl)	Total Central Office Switches (cm)	Basic Rate ISDN Control Channels (cn)	Primary Rate ISDN Control Channels (co)
0110	Alabama	AL	76	73	149	9,528	4,924
0200	Florida	FL	138	82	220	20,230	14,668
0210	Georgia	GA	107	87	194	22,902	11,238
0280	Kentucky	KY	45	149	194	3,196	3,122
0290	Louisiana	LA	108	124	232	8,569	5,014
0350	Mississippi	MS	37	169	206	2,623	3,231
0440	North Carolina	NC	103	41	144	9,162	5,382
0510	South Carolina	SC	56	62	118	4,757	3,746
0530	Tennessee	TN	111	90	201	18,525	6,341
0910	Total	TO	781	877	1,658	99,492	57,666

(See State Row Numbers and Codes Reference Table for the row numbers and the state codes applicable to your filing and for the correct order in which the rows shall appear)

Form 43-08
OPERATING DATA REPORT

COMPANY BellSouth Telecommunications, Inc
AREA All
Period From Jan 2003 To Dec 2003
BSTR

UNRESTRICTED
SUBMISSION 1
TABLE III
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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

STATE OR TERR (1a)	Business Switched Access Lines			Payphone Lines (1e)	Residential Switched Access Lines			Total Switched Access Lines (1i)
	Code (1b)	Single Line (1c)	Multiline (1d)		Lifeline (1f)	Non-Lifeline		
						Primary (1g)	Non- Primary (1h)	
Alabama	AL	32,029	433,213	8,954	17,981	1,058,227	95,571	1,645,975
Florida	FL	99,402	1,561,379	15,744	103,681	3,245,412	578,006	5,603,624
Georgia	GA	59,669	1,135,097	16,138	55,680	1,811,770	288,631	3,366,985
Kentucky	KY	22,371	291,819	5,437	23,814	639,117	43,113	1,025,671
Louisiana	LA	40,950	562,327	11,501	20,153	1,224,565	154,053	2,013,549
Mississippi	MS	31,274	307,116	7,595	22,559	721,473	54,933	1,144,950
North Carolina	NC	42,445	659,493	10,743	44,966	1,271,919	150,147	2,179,713
South Carolina	SC	26,492	350,423	7,693	16,905	844,261	74,311	1,320,085
Tennessee	TN	42,622	549,236	13,542	36,060	1,485,644	168,112	2,295,216
Texas	TX	397,254	5,850,103	97,347	341,799	12,302,388	1,606,877	20,595,768

See Row Numbers and Codes Reference Table for the row numbers and the state codes
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ARMIS OPERATING DATA REPORT

COMPANY. BellSouth Telecommunications, Inc
STUDY AREA All
PERIOD: From Jan 2003 To Dec 2003
COSA BSTR

UNRESTRICTED VERSION
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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

ROW NO	STATE OR TERR (fa)	Code (fb)	Special Access Lines (Non-switched)		Total Access Lines (Switched & Special) (fl)	Local Private Lines (fm)
			Analog (4kHz or Equivalent) (fj)	Digital (64 kbps or Equivalent) (fk)		
0110	Alabama	AL	12,584	1,333,134	2,991,693	221,953
0200	Florida	FL	75,944	5,095,313	10,774,881	585,353
0210	Georgia	GA	33,153	5,229,589	8,629,727	482,815
0280	Kentucky	KY	6,706	751,718	1,784,095	138,429
0290	Louisiana	LA	20,149	1,967,995	4,001,693	244,941
0350	Mississippi	MS	4,418	618,615	1,767,983	141,638
0440	North Carolina	NC	49,071	2,420,761	4,649,545	260,038
0510	South Carolina	SC	11,624	1,018,077	2,349,786	150,716
0530	Tennessee	TN	41,545	1,962,776	4,299,537	276,866
0910	Total	TO	255,194	20,397,978	41,248,940	2,502,749

(See State Row Numbers and Codes Reference Table for the row numbers and the state codes applicable to your filing and for the correct order in which the rows shall appear)

COMPANY BELLSOUTH TELECOMMUNICATIONS, INC
STUDY AREA ALL
PERIOD From JAN 2001 TO DEC 2001
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Unrestricted Version
SUBMISSION 1
TABLE B-6
PAGE 1 OF 1

TABLE B-6 - SUMMARY OF INVESTMENT AND ACCUMULATED DEPRECIATION BY JURISDICTION
(Dollars in Thousands)

Row No	Description (a)	Telephone Plant Before Amortizable Assets (Accounts 2110 through 2441)					
		Telephone Plant Beginning Balance (b)	Telephone Plant Additions (c)	Telephone Plant Retirements w/Traffic (d)	Telephone Plant Retirements w/o Traffic (e)	Other Charges and Credits (f)	Telephone Plant Ending Balance (g)
0110	Alabama	5,012,695	383,956	0	292,912	65,542	5,169,281
0200	Florida	13,114,592	999,285	0	310,479	34,348	13,837,746
0210	Georgia	10,511,290	1,325,441	0	333,546	-4,745	11,498,440
0280	Kentucky	2,838,557	219,091	0	92,698	16,857	2,981,807
0290	Louisiana	5,080,205	327,126	0	133,114	18,062	5,292,279
0350	Mississippi	3,341,566	318,328	0	149,593	14,786	3,525,087
0440	North Carolina	5,803,105	486,674	0	167,908	13,500	6,135,371
0510	South Carolina	3,434,338	236,160	0	69,077	16,283	3,617,704
0530	Tennessee	5,645,111	399,810	0	135,473	22,589	5,932,037
0910	Total	54,781,459	4,695,871	0	1,684,800	197,222	57,989,752

Row No	Description (a)	Accumulated Depreciation (Account 3100)						
		Beginning Balance (h)	Depreciation Accruals (i)	Gross Salvage (j)	Cost of Removal (k)	Other Charges and Credits (l)	Ending Balance (m)	Beginning Ratio (n)
0110	Alabama	2,771,107	342,236	5,565	9,874	-224,579	2,884,455	55.28
0200	Florida	7,336,375	933,116	11,883	17,642	-235,141	8,028,591	55.94
0210	Georgia	5,402,945	767,199	4,429	17,327	-255,501	5,901,745	51.40
0280	Kentucky	1,578,722	197,439	3,076	4,949	-67,864	1,706,424	55.62
0290	Louisiana	3,171,500	344,844	2,005	6,482	-113,519	3,398,348	62.43
0350	Mississippi	1,994,800	261,188	7,109	6,557	-129,518	2,127,022	59.70
0440	North Carolina	3,143,578	440,541	3,059	8,196	-145,851	3,433,129	54.17
0510	South Carolina	1,940,603	244,495	769	3,632	-51,010	2,131,225	56.51
0530	Tennessee	2,961,372	404,622	2,325	9,063	-106,620	3,252,636	52.46
0910	Total	30,301,002	3,935,680	40,220	83,724	-1,329,603	32,863,575	55.31

FCC Report 43-08
ARMIS OPERATING DATA REPORT

COMPANY. BellSouth Telecommunications, Inc
STUDY AREA All
PERIOD. From Jan 2001 To Dec 2001
COSA BSTR

UNRESTRICTED V
SUBMISSION 1
TABLE II
Page 1 of 2

TABLE II - SWITCHED ACCESS LINES IN SERVICE BY TECHNOLOGY

ROW NO	STATE OR TERR (ca)	Code (cb)	Analog (4Khz or Equiv.)			Digital (64Kbps or Equiv.)			Other Switched Access Lines (ci)	S
			Main Access Lines (cc)	PBX and Centrex Trunks (cd)	Centrex Extensions (ce)	Main Access Lines (cf)	PBX and Centrex Trunks (cg)	Centrex Extensions (ch)		
0110	Alabama	AL	1,649,564	64,317	31,091	33,351	0	71,598	0	
0200	Florida	FL	5,848,300	150,086	28,465	100,248	0	222,430	0	
0210	Georgia	GA	3,232,249	117,221	34,112	97,011	0	330,764	0	
0280	Kentucky	KY	1,079,116	37,673	8,464	18,478	0	46,910	0	
0290	Louisiana	LA	2,041,923	75,497	71,544	36,911	0	63,067	0	
0350	Mississippi	MS	1,149,601	45,447	14,280	18,321	0	59,723	0	
0440	North Carolina	NC	2,074,989	61,246	5,749	44,996	0	203,323	0	
0510	South Carolina	SC	1,294,206	33,854	5,960	26,671	0	78,466	0	
0530	Tennessee	TN	2,304,610	82,912	12,714	74,622	0	65,468	0	
0910	Total	TO	20,674,558	668,253	212,379	450,609	0	1,141,749	0	

(See State Row Numbers and Codes Reference Table for the row numbers and the state codes applicable to your filing and for the correct order in which the rows shall appear.)

FCC Report 43-08
ARMIS OPERATING DATA REPORT

COMPANY BellSouth Telecommunications, Inc
STUDY AREA. All
PERIOD From Jan 2001 To Dec 2001
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UNRESTRICTED VERSION
SUBMISSION 1
TABLE II
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TABLE II - SWITCHED ACCESS LINES IN SERVICE BY TECHNOLOGY

ROW NO	STATE OR TERR. (ca)	Code (cb)	Central Office Switches Excluding Remotes (ck)	Remote Switches (cl)	Total Central Office Switches (cm)	Basic Rate ISDN Control Channels (cn)	PrimaryRate ISDN Control Channels (co)
0110	Alabama	AL	83	66	149	11,579	5,264
0200	Florida	FL	144	74	218	26,301	14,561
0210	Georgia	GA	112	89	201	36,939	11,272
0280	Kentucky	KY	57	137	194	3,989	2,831
0290	Louisiana	LA	108	124	232	12,424	5,288
0350	Mississippi	MS	67	138	205	3,059	3,197
0440	North Carolina	NC	103	41	144	11,713	6,089
0510	South Carolina	SC	58	63	121	6,128	3,792
0530	Tennessee	TN	111	90	201	25,752	7,118
0910	Total	TO	843	822	1,665	137,884	59,412

(See State Row Numbers and Codes Reference Table for the row numbers and the state codes applicable to your filing and for the correct order in which the rows shall appear.)

FCC Report 43-08
ARMIS OPERATING DATA REPORT

COMPANY BellSouth Telecommunications, Inc
STUDY AREA. All
PERIOD From Jan 2001 To Dec 2001
COSA. BSTR

UNRESTRICTED VERSION
SUBMISSION 1
TABLE III
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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

ROW NO	STATE OR TERR. (da)	Code (db)	Business Access Lines			Payphone Lines (df)	Residential Access Lines		Mobile Access Lines (di)	Total Switched Access Lines (dj)
			Analog Single Line (4 kHz or Equiv.) (dc)	Analog Multi- Line (4kHz or Equiv.) (dd)	Digital (64 kbps or Equiv.) (de)		Analog (4 kHz or Equiv.) (dg)	Digital (64 kbps or Equiv.) (dh)		
0110	Alabama	AL	36,408	318,579	103,817	14,787	1,375,198	1,132	0	1,849,921
0200	Florida	FL	100,886	1,256,842	318,114	42,144	4,626,979	4,564	0	6,349,529
0210	Georgia	GA	63,028	678,538	421,791	33,612	2,608,404	5,984	0	3,811,357
0280	Kentucky	KY	25,355	209,683	64,802	10,333	879,882	586	0	1,190,641
0290	Louisiana	LA	44,010	469,331	99,108	21,214	1,654,409	870	0	2,288,942
0350	Mississippi	MS	34,799	226,359	77,672	13,134	935,036	372	0	1,287,372
0440	North Carolina	NC	46,799	415,550	246,621	17,916	1,661,719	1,698	0	2,390,303
0510	South Carolina	SC	29,896	233,195	104,517	15,052	1,055,877	620	0	1,439,157
0530	Tennessee	TN	50,130	417,179	119,894	23,421	1,909,506	20,196	0	2,540,326
0910	Total	TO	431,311	4,225,256	1,556,336	191,613	16,707,010	36,022	0	23,147,548

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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

ROW NO.	STATE OR TERR. (da)	Code (db)	Special Access Lines (non-switched)		Total Access Lines (Switched & Special) (dm)
			Analog (4 kHz or Equiv) (dk)	Digital (64 kbps or Equiv) (dl)	
0110	Alabama	AL	18,395	853,940	2,722,256
0200	Florida	FL	107,315	4,132,271	10,589,115
0210	Georgia	GA	53,231	4,219,387	8,083,975
0280	Kentucky	KY	6,685	571,923	1,769,249
0290	Louisiana	LA	19,820	1,186,722	3,495,484
0350	Mississippi	MS	6,644	433,612	1,727,628
0440	North Carolina	NC	53,115	1,933,960	4,377,378
0510	South Carolina	SC	14,938	820,936	2,275,031
0530	Tennessee	TN	53,791	1,596,762	4,190,879
0910	Total	TO	333,934	15,749,513	39,230,995

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TABLE B-6 - SUMMARY OF INVESTMENT AND ACCUMULATED DEPRECIATION BY JURISDICTION
(Dollars in Thousands)

Row No	Description (a)	Telephone Plant Before Amortizable Assets (Accounts 2110 through 2441)					
		Telephone Plant Beginning Balance (b)	Telephone Plant Additions (c)	Telephone Plant Retirements w/Traffic (d)	Telephone Plant Retirements w/o Traffic (e)	Other Charges and Credits (f)	Telephone Plant Ending Balance (g)
0110	Alabama	4,693,575	320,766	0	304,514	73,559	4,783,386
0200	Florida	11,873,424	931,586	0	933,912	372,093	12,243,191
0210	Georgia	9,093,060	938,213	0	426,958	25,694	9,630,009
0280	Kentucky	2,582,751	195,476	0	145,145	43,729	2,676,811
0290	Louisiana	4,697,398	309,721	0	202,345	50,102	4,854,876
0350	Mississippi	3,078,653	224,054	0	150,064	10,225	3,162,868
0440	North Carolina	5,110,877	410,879	0	175,038	53,091	5,399,809
0510	South Carolina	3,088,296	229,333	0	109,789	25,188	3,233,028
0530	Tennessee	5,140,084	367,210	0	276,970	86,222	5,316,546
0910	Total	49,358,118	3,927,238	0	2,724,735	739,903	51,300,524

Row No	Description (a)	Accumulated Depreciation (Account 3100)						
		Beginning Balance (h)	Depreciation Accruals (i)	Gross Salvage (j)	Cost of Removal (k)	Other Charges and Credits (l)	Ending Balance (m)	Beginning Ratio (n)
0110	Alabama	2,512,374	317,574	5,369	7,993	88,712	2,611,522	53 53
0200	Florida	6,466,322	822,469	81,589	13,817	373,095	6,795,746	54 46
0210	Georgia	4,685,344	652,205	9,052	9,857	76,288	4,986,074	51 53
0280	Kentucky	1,363,916	181,275	3,080	4,199	40,623	1,439,550	52 81
0290	Louisiana	2,800,070	317,900	5,955	6,149	48,605	2,964,036	59 61
0350	Mississippi	1,746,103	234,819	1,928	3,899	17,130	1,846,017	56 72
0440	North Carolina	2,631,191	389,009	7,295	5,080	32,768	2,880,145	51 48
0510	South Carolina	1,663,475	216,225	4,168	4,089	14,746	1,784,736	53 86
0530	Tennessee	2,567,360	360,399	4,878	8,331	77,956	2,725,292	49 95
0910	Total	26,436,155	3,491,875	123,314	63,414	769,923	28,033,118	53 56

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TABLE II - SWITCHED ACCESS LINES IN SERVICE BY TECHNOLOGY

ROW NO	STATE OR TERR (ca)	Code (cb)	Analog (4Khz or Equiv)			Digital (64Kbps or Equiv)			Other Switched Access Lines (ci)	Total Switched Access Lines (cj)
			Main Access Lines (cc)	PBX and Centrex Trunks (cd)	Centrex Extensions (ce)	Main Access Lines (cf)	PBX and Centrex Trunks (cg)	Centrex Extensions (ch)		
0110	Alabama	AL	1,758,926	69,223	40,318	6,744	0	69,864	0	1,945,075
0200	Florida	FL	6,041,335	232,947	108,315	24,089	0	144,884	0	6,551,570
0210	Georgia	GA	3,564,335	185,881	160,943	28,508	0	212,388	0	4,152,055
0280	Kentucky	KY	1,120,295	41,312	24,553	3,427	0	31,187	0	1,220,774
0290	Louisiana	LA	2,129,743	81,663	105,958	7,497	0	29,631	0	2,354,492
0350	Mississippi	MS	1,178,478	45,037	28,377	2,427	0	44,912	0	1,299,231
0440	North Carolina	NC	2,184,313	97,461	30,743	11,999	0	153,943	0	2,478,459
0510	South Carolina	SC	1,316,355	52,812	23,597	5,281	0	68,674	0	1,466,719
0530	Tennessee	TN	2,473,253	95,287	21,748	26,138	0	63,364	0	2,679,790
0910	Total	TO	21,767,033	901,623	544,552	116,110	0	818,847	0	24,148,165

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TABLE II - SWITCHED ACCESS LINES IN SERVICE BY TECHNOLOGY

ROW NO	STATE OR TERR (ca)	Code (cb)	Central Office Switches Excluding Remotes (ck)	Remote Switches (cl)	Total Central Office Switches (cm)	Basic Rate ISDN Control Channels (cn)	PrimaryRate ISDN Control Channels (co)
0110	Alabama	AL	90	61	151	12 098	3,167
0200	Florida	FL	143	76	219	28,940	9,312
0210	Georgia	GA	113	90	203	40,524	6,539
0280	Kentucky	KY	45	137	182	3,822	1 263
0290	Louisiana	LA	111	124	235	11,251	3,426
0350	Mississippi	MS	95	112	207	2,900	1,477
0440	North Carolina	NC	108	40	148	13,272	4 220
0510	South Carolina	SC	60	61	121	5,937	2,329
0530	Tennessee	TN	112	89	201	28,615	4 379
0910	Total	TO	877	790	1,667	147,359	36,112

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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

ROW NO	STATE OR TERR (da)	Code (db)	Business Access Lines			Payphone Lines (df)	Residential Access Lines		Mobile Access Lines (di)	Total Switched Access Lines (dj)
			Analog Single Line (4 kHz or Equiv) (dc)	Analog Multi-Line (4 kHz or Equiv) (dd)	Digital (64 kbps or Equiv) (de)		Analog (4 kHz or Equiv) (dg)	Digital (64 kbps or Equiv) (dh)		
0110	Alabama	AL	39 523	410 793	75 535	19 446	1,398,705	1 073	0	1,945 075
0200	Florida	FL	110,187	1 639,554	164,598	71,314	4,561,542	4,375	0	6 551,570
0210	Georgia	GA	80,728	1 050 225	234,506	50,752	2 729,454	6 390	0	4,152,055
0280	Kentucky	KY	27 115	259,821	34 135	13,052	886 172	479	0	1,220,774
0290	Louisiana	LA	45 220	576 794	36,277	26,038	1 669,312	851	0	2 354,492
0350	Mississippi	MS	38,794	269,993	47,072	15,268	927,837	267	0	1 299,231
0440	North Carolina	NC	72 392	582 368	163 005	21,822	1 635 935	2,937	0	2 478 459
0510	South Carolina	SC	32 029	312,364	73 374	18 284	1 030 087	581	0	1 466 719
0530	Tennessee	TN	53 305	550,917	76,396	28 588	1 957,478	13,106	0	2,679,790
0910	Total	TO	499,293	5 652 829	904,898	264,564	16,796,522	30,059	0	24 148,165

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TABLE III - ACCESS LINES IN SERVICE BY CUSTOMER

—— Special Access Lines (non-switched) ——

ROW NO	STATE OR TERR (da)	Code (db)	Analog (4 kHz or Equiv) (dk)	Digital (64 kbps or Equiv) (dl)	Total Access Lines (Switched & Special) (dm)
0110	Alabama	AL	10 495	354 623	2,310,193
0200	Florida	FL	21,839	1 790,885	8 364,294
0210	Georgia	GA	33,659	2,116,010	6,301 724
0280	Kentucky	KY	5 761	262 769	1,489,304
0290	Louisiana	LA	7,676	423,532	2,785 700
0350	Mississippi	MS	4,642	212 153	1,516,026
0440	North Carolina	NC	22 218	938 797	3 439 474
0510	South Carolina	SC	6,719	318 057	1 791 495
0530	Tennessee	TN	41,706	723,799	3,445,295
0910	Total	TO	154,715	7,140,625	31 443,505

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