



**BOULT • CUMMINGS  
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November 24, 2003

Honorable Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

*Proprietary Confidential Commercial  
Information Subject to Protective Order in this  
Proceeding (03-00491) and Exempt from  
Disclosure Pursuant to 5 U.S.C. §552(b)(4)*

In Re: Implementation of the Federal Communications Commission's Triennial  
Review Order (Nine-month Proceeding) (Switching)

Docket No. 03-00491

Dear Chairman Tate:

Enclosed please find a CD-Rom and five (5) copies of MCI Metro Access  
Transmission Services, Inc. and Brooks Fiber Communications of Tennessee, Inc. (collectively  
"MCI") Responses to BellSouth Telecommunications Inc.'s First Set of Interrogatories (Nos. 1-  
84) and First Requests for Production of Documents (Nos. 1-21) in the above-referenced docket.  
The information included herein is proprietary information under the terms of the Protective  
Order entered in this docket and confidential commercial information under the Freedom of  
Information Act, 5 U.S.C. § 552(b)(4).

Also enclosed is a CD-Rom and five (5) copies of MCI's Responses that do not  
contain the proprietary information.

Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Jon E. Hastings

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BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Switching)*  
Docket No. 03-00491

**MCI's RESPONSES TO BELL SOUTH TELECOMMUNICATIONS  
INC.'S FIRST SET OF INTERROGATORIES (Nos. 1-84) AND  
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS (Nos. 1-21)**

MCI metro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc. and MCI WorldCom Communications, Inc. (hereinafter "MCI"), pursuant to the Tennessee Regulatory Authority ("TRA") Rule 1220-1-2.11(9) and Rule 37.01 of the Tennessee Rules of Civil Procedure, as well as the Hearing Officer's Order of October 27, 2003 setting a procedural schedule, as revised, hereby respond to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories and First Requests for Production of Documents to MCI, served on October 27, 2003. These and any supplemental responses made to BellSouth's First Set of Interrogatories and First Requests for Production of Documents to MCI are and will be made subject to the objections filed by MCI on November 6, 2003 and any subsequent-stated objections of MCI, the protective agreement previously executed between the parties, and any protective order as may be issued by the Tennessee Regulatory Authority ("TRA" or "Authority") in this docket.

**INTERROGATORIES**

**INTERROGATORY 1.** Identify each switch owned by MCI that MCI uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain

confidential switch data pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit A.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 2.** For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential switch data pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit A.

With respect to Interrogatory 2 (d)-(e), subject to, and without waiving its objections, MCI states as follows: MCI adds and adopts and incorporates General Objection 1. MCI will provide to BellSouth certain confidential switch data pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit B.

With respect to Interrogatory 2 (f), subject to, and without waiving its objections, MCI states as follows: MCI adds and adopts and incorporates General Objection 1. MCI will provide to BellSouth certain confidential switch data pursuant to the protective agreement between the parties in the attached confidential documents identified as Exhibits A and B.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 3.** Identify any other switch not previously identified in Interrogatory No. 1 that MCI uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by MCI either on an

unbundled or resale basis.

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: There are no switches responsive to this Interrogatory.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 4.** For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) identify all documents referring or relating to the rates, terms, and conditions of MCI’s use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: See response to Interrogatory No. 3.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 5.** Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain information in the attached document identified as Exhibit C. Please note that the information in the attached response is where MCI offers facilities-based business service because MCI does not offer mass market residential service using self-provisioned switching.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 6.** For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: The term "voice grade equivalent lines" (VGEs) is not meaningful in the context of the trigger analysis established in the FCC's Order. (*See* 47 C.F.R. 51.319(d)(2), referring to DS0 capacity (i.e., mass market determinations.)) The above clarification notwithstanding, MCI is working to determine if it is reasonably able to provide the information requested. Currently, MCI does not maintain this information in the format requested.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 7.** With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: The term "voice grade equivalent lines" (VGEs) is not meaningful in the context of the trigger analyses established in the FCC's Order. (*See* 47 C.F.R. 51.319(d)(2), referring to DS0 capacity (i.e., mass market determinations.) The above clarification notwithstanding, MCI is working to determine if it is reasonably able to provide the information requested. Currently, MCI does not maintain this information in the format requested.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 8.** Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: See response to Interrogatory No. 3.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 9.** For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: See response to Interrogatory No. 3

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 10.** With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**MCI RESPONSE:** MCI adds and adopts and incorporates General Objection 1. Subject to, and without waiving its objections, MCI states as follows: See response to Interrogatory No. 3.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 11.** Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit D.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 12.** For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit D. In providing this confidential information, MCI further states that its business records do not reflect "voice-grade equivalent lines information," but the confidential information that will be provided does reflect ANIs, Accounts/Customer, Average Lines per Account, and Location for each CLLI code.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 13.** With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;



- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit D. In providing this confidential information, MCI further states that its business records do not reflect "voice-grade equivalent lines information," but the confidential information that will be provided does reflect ANIs, Accounts/Customer, Average Lines per Account, and Location for each CLLI code.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 14.** Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of MCI's provision of switching capability.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 15.** Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

MCI RESPONSE: MCI adopts and incorporates its objections as previously stated.

Response provided by: Objections provided by Counsel.

**INTERROGATORY 16.** Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

MCI RESPONSE: MCI adopts and incorporates its objections as previously stated.

Response provided by: Objections provided by Counsel.

**INTERROGATORY 17.** If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

MCI RESPONSE: MCI adopts and incorporates its objections as previously stated.

Response provided by: Objections provided by Counsel.

**INTERROGATORY 18.** Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Tennessee? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Tennessee.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 19.** Identify each MSA in Tennessee where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, data provided in response to Interrogatories 1, 2, 5, and 11, and the qualifications stated therein, is the best available information responsive to this request based upon the information available from MCI's business records.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 20.** If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, data provided in response to Interrogatories 1, 2, 5, and 11, and the qualifications stated therein, is the best available information responsive this request based upon the information available from MCI's business records.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 21.** Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, BellSouth can generally obtain relevant rates, terms, and conditions for MCI's service offerings in Tennessee from the tariffs and price lists on file with the Authority. In addition, data provided in response to Interrogatories 1, 2, 5, and 11, and the qualifications stated therein, is also responsive to this request, based upon the information available from MCI's business records.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 22.** Identify each MSA in Tennessee where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, MCI currently offers one or more non-qualifying services throughout the state of Tennessee. For example, MCI currently offers intrastate long distance service throughout Tennessee.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 23.** If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, MCI currently offers one or

more non-qualifying services throughout the state of Tennessee. For example, MCI currently offers intrastate long distance service throughout Tennessee.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 24.** Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain information on an MSA basis. However, BellSouth can generally obtain relevant rates, terms, and conditions for MCI's service offerings in Tennessee from the tariffs and price lists on file with the Authority, the Federal Communications Commission, [www.mci.com/service](http://www.mci.com/service), and [www.mci.com/sb/service agreement](http://www.mci.com/sb/service_agreement). In addition, data provided in response to Interrogatories 1, 2, 5, and 11, and the qualifications stated therein, is also responsive to this request, based upon the information available from MCI's business records.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 25.** Please state the total number of end users customers in the State of Tennessee to whom you only provide qualifying service.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between "qualifying" and "non-qualifying" services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the number of its residential customers in Tennessee to whom MCI provides qualifying services pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 26.** For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the average monthly revenues for residential customers receiving qualifying services pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 27.** For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the average number of lines for residential customers receiving qualifying services pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 28.** Please state the total number of end users customers in the State of Tennessee to whom you only provide non-qualifying service.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the total number of end user residential customers in the State of Tennessee to whom MCI provides non-qualifying service pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 29.** For those end user customers to whom you only provide non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the average monthly revenues for end user residential customers in the State of Tennessee to whom MCI provides non-qualifying service pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 30.** Please state the total number of end users customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the total number of end users residential customers in the State of Tennessee to whom MCI provides both qualifying and non-qualifying service pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 31.** For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the average monthly revenues MCI receives from each end user residential customer in the State of Tennessee to whom MCI provides both qualifying and non-qualifying service pursuant to the protective agreement

between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 32.** For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for MCI to separately track and identify customers on the basis of regulatory distinctions between “qualifying” and “non-qualifying” services. In an effort to be responsive, MCI will provide to BellSouth certain confidential information containing the average number of lines for each end user residential customer in the State of Tennessee to whom MCI provides both qualifying and non-qualifying service pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 33.** Please provide a breakdown of the total number of end user customers served by MCI in Tennessee by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI is working to determine if it is reasonably able to provide the information requested.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 34.** For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not maintain data concerning its average “acquisition” cost by class or otherwise as is requested in this Interrogatory. However, in an effort to be responsive, the “acquisition” cost



information readily available to MCI is confidential telemarketing costs, and such confidential information will be provided to BellSouth pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E. These figures only reflect the acquisition costs associated with MCI's telemarketing activities. These figures include internal nonrecurring costs incurred to make the sale and provision the customer as well as external nonrecurring charges imposed on MCI by ILECs to provision the customer's service. These costs would not include any marketing headcount, advertising, or direct mail costs. MCI further notes outside of telemarketing, there are many other means by which customers may be acquired, and the "acquisition" costs in such situations can vary widely based upon the types of customer classes (for example, residential versus business, or small business versus large business), the means utilized to acquire such customers, and the underlying ILEC nonrecurring charges associated with providing service to such customers.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 35.** For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information on churn for mass market customers pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit F.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 36.** For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI cannot state with certainty its percentages of the local exchange market since MCI does not know the number of end user customers served by every other company in the market. This is further complicated by the fact that some customers use more than one carrier to provide the same service as MCI or different services than those provided by MCI to such customers. Notwithstanding these objections and commentary, MCI will provide to BellSouth certain confidential information regarding estimated market share pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 37.** Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Tennessee.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has not identified any documents discussing or evaluating market share for local exchange service in Tennessee.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 38.** Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Tennessee.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has not identified any documents discussing or evaluating market share for local exchange service in Tennessee.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 39.** Describe how the marketing organization that is responsible for marketing qualifying service in Tennessee is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has a national marketing organization with specific mid-level managers responsible for regional initiatives. MCI does periodically use authorized sales representatives to support regional initiatives. The nature, extent, rate, terms and conditions of such use varies dramatically depending on the scope of the initiative.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 40.** How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: Not being a monopoly provider of service, MCI does not determine whether it will serve an individual customer's location with multiple DSOs or whether it will use a DS1, the customer makes this decision. MCI can attempt to show the customer which type of service it believes will best meet each customers needs. However, the decision on what is purchased is made by the customer.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 41.** Is there a typical or average number of DS0s at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: Not being a monopoly provider of service, MCI does not determine whether it will serve an individual customer's location with multiple DSOs or whether it will use a DS1, the customer makes this decision. MCI can attempt to show the customer which type of service it believes will best meet each customers needs. However, the decision on what is purchased is made by the customer.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 42.** What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI has not completed its analysis and review of this issue, so it is not able to respond

to the issues raised by this Interrogatory. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 43.** What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not use cost of capital in determining whether to offer a qualifying service in a particular geographic market.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 44.** With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI does not use cost of capital in determining whether to offer a qualifying service in a particular geographic market.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 45.** In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 46.** Provide your definition of sales expense as that term is used in your business.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 47.** Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 48.** Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 49.** Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 50.** For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for MCI in each state in BellSouth's region.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI has not identified any information responsive to this request. MCI is continuing to investigate whether it has any information responsive to this request, and will advise and provide such information to BellSouth if and when such information may be located.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 51.** For each individual hot cut identified in response to Interrogatory No. 50, state:

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, MCI, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether MCI complained in writing to BellSouth or anyone else.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: MCI has not identified any information responsive to this request. MCI is continuing to investigate whether it has any information responsive to this request, and will advise and provide such information to BellSouth if and when such information may be located.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 52.** Does MCI have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the

input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 53.** Does MCI have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 54.** State whether MCI agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 16, 2001 Memorandum of Understanding. If MCI does not agree, explain why and explain MCI's view of its involvement in the development of that process.

MCI RESPONSE: BellSouth has withdrawn this Interrogatory.

**INTERROGATORY 55.** If MCI has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 56.** If MCI has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing bulk hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such bulk hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 57.** Does MCI have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 58.** Does MCI have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.



MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing bulk hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such bulk hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 59.** What is the largest number of individual hot cuts that MCI has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has not ordered any hot cuts on a commercial basis for residential customers.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 60.** Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 61.** Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 62.** Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 63.** Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other

carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 64.** Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 65.** Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by

Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 66.** Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 67.** Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 68.** Does MCI order coordinated or non-coordinated hot cuts?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has not ordered any hot cuts on a commercial basis for residential customers.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 69.** Does MCI use the CFA database?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI will provide to BellSouth certain confidential information pursuant to the protective agreement between the parties in the attached confidential document identified as Exhibit E.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 70.** Identify every issue related to BellSouth's hot cut process raised by MCI at the Tennessee CLEC collaborative since October 2001.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: BellSouth has participated in, and is the keeper of, the issues list in the collaborative process. Hence, BellSouth is the best source for this information. However, in an effort to be responsive, MCI has not located any information where MCI raised a hot cuts issue at the collaborative.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 71.** What is the appropriate volume of loops that you contend the Tennessee Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 72.** What is the appropriate process that you contend the Tennessee Public Service Commission should use in establishing a batch hot cut process

consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 73.** If MCI disagrees with BellSouth's individual hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 74.** If MCI disagrees with BellSouth's bulk hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing bulk hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such bulk hot cut processes need to be developed through the

input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 75.** Identify by date, author and recipient every written complaint MCI has made to BellSouth regarding BellSouth's hot cut process since October 2001.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: MCI has not ordered any hot cuts on a commercial basis for residential customers.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 76.** How many unbundled loops does MCI contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch or individual hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch and individual hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 77.** What is the appropriate information that you contend the Tennessee Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers

throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 78.** What is the average completion interval metric for provision of high volumes of loops that you contend the Tennessee Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 79.** What are the rates that you contend the Tennessee Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI does not have a preferred process for performing batch hot cuts since MCI is not presently fully apprised of all such hot cut processes available from BellSouth and other carriers throughout the state, region, and country. MCI is currently in the process of identifying and developing this kind of information for analysis, and this process will, in part, be dependent upon discovery responses developed in this proceeding and in others throughout the country that are now underway. However, any such batch hot cut processes need to be developed through the input of each of the carriers, and it is critical that the resulting hot cut process must be provided by each ILEC on a nondiscriminatory basis.



Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 80.** What are the appropriate product market(s) that you contend the Tennessee Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI is not prepared to identify the appropriate product market(s) that should be considered. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 81.** What are the appropriate geographic market(s) that you contend the Tennessee Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI is not prepared to identify the appropriate geographic market(s) that should be considered. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 82.** Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

MCI RESPONSE: Subject to, and without waiving its objections, MCI states as follows: At this time, MCI has not completed its analysis and review of this issue, so it is not able to respond to the issues raised by this Interrogatory. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 83.** Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI has not completed its analysis and review of this issue, so it is not able to respond to the issues raised by this Interrogatory. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

**INTERROGATORY 84.** What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the Tennessee Public Service Commission should consider in establishing a “cutoff” consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**MCI RESPONSE:** Subject to, and without waiving its objections, MCI states as follows: At this time, MCI has not completed its analysis and review of this issue, so it is not able to respond to the issues raised by this Interrogatory. MCI is currently in the process of attempting to develop its position on this issue through various means that are ongoing and not yet completed.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

### **REQUESTS FOR PRODUCTION**

**PRODUCTION REQUEST No. 1.** Produce all documents identified in response to BellSouth’s First Set of Interrogatories.

**MCI RESPONSE:** All documents identified in response to BellSouth’s individual interrogatories are marked as such and appended to the interrogatories subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any

protective order of the Authority.

**PRODUCTION REQUEST No. 2.** Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 15, subject to the corresponding interrogatory objections; any actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 3.** Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide qualifying service.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 26, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 4.** Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you only provide qualifying service.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 27, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 5.** Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 29, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 6.** Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 31, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 7.** Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 32, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 8.** Provide all documents referring or relating to the classifications used by MCI to offer service to end user customers Tennessee (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 33, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 9.** Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 34.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 34, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 10.** Produce all documents referring or relating to the typical churn for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 35.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 35, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 11.** Produce all documents referring or relating to how MCI determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 40, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 12.** Produce all documents referring or relating to the typical or average number of DS0s at which MCI would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 40, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 13.** Produce all documents referring or relating to the cost of capital used by MCI in evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 43, there are no documents responsive to this request.

**PRODUCTION REQUEST No. 14.** Produce all documents referring or relating to the time period used by MCI in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 45, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 15.** Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 47, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 16.** Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: Any documents responsive to this request have been identified and appended to the response to Interrogatory No. 48, subject to the corresponding interrogatory objections; the actual production of confidential information is being made solely pursuant to the protective agreement between the parties and any protective order of the Authority.

**PRODUCTION REQUEST No. 17.** Produce all documents referring or relating to any complaints by MCI or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 51, there are no documents responsive to this request.

**PRODUCTION REQUEST No. 18.** Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 60, there are no documents responsive to this request.

**PRODUCTION REQUEST No. 19.** Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 62, there are no documents responsive to this request.

**PRODUCTION REQUEST No. 20.** Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 64, there are no documents responsive to this request.

**PRODUCTION REQUEST No. 21.** Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: Subject to the objections provided in response to Interrogatory No. 65, there are no documents responsive to this request.

Respectfully submitted this 24<sup>th</sup> day of November, 2003.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2003, a copy of the foregoing document was served on the parties of record, via electronically, US mail or hand delivery:

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