BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE:

IMPLEMENTATION OF THE FEDERAL COMMUNICATIONS COMMISSION'S TRIENNIAL REVIEW ORDER – 9 MONTH PROCEEDING – SWITCHING	))))	DOCKET NO. 03-00491

AT&T'S RESPONSES TO BELLSOUTH'S FIRST SET OF INTERROGATORIES (Nos. 1-84)

PUBLIC VERSION

AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Order on October 21, 2003 Status Conference, issued by Director Jones of the Tennessee Regulatory Authority ("TRA") (hereinafter "*Procedural Order*"), Rules 26.02 and 33.01 of the Tennessee Rules of Civil Procedure, and subject to the General and Specific Objections filed on or about November 6, 2003, hereby submits the following responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communication of the Southern States, LLC, served on October 24, 2003, as follows:

SPECIFIC RESPONSES

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 1: Identify each switch owned by AT&T that AT&T 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.)

Response: To the extent that the definitions of "qualifying service" and "non-qualifying service" as defined by BellSouth in BellSouth's First Set of Interrogatories to AT&T are different than the definitions of "qualifying" and "non-qualifying" service as defined in 47 C.F.R. § 51.5, this interrogatory is vague. Specifically, 47 C.F.R. § 51.5 defines a "qualifying service" as "a telecommunications service that competes with a telecommunications service that has been traditionally the exclusive or primary domain of incumbent local exchange carriers ("ILECs"), including, but not limited to, local exchange service, such as plain old telephone service ("POTS"), and access services, such as digital subscriber line services and high capacity circuits." "Non-qualifying services" are defined as services that are "not qualifying service[s]." Id. Subject to the foregoing, and without waiving any objection, AT&T will construe the terms contained in this interrogatory, and all other interrogatories, in accordance with 47 C.F.R. § 51.5 and applicable law and consider all traditional local telecommunications service as a "qualifying" service and all traditional long distance service as "non-qualifying" service.

Subject to the foregoing see Confidential Attachments 1a and 1b. These attachments provide information on two categories of switches used (and owned) by AT&T. The first category consists of "Class 5" switches.

The second category consists of switches used (and owned) by AT&T to provide AT&T Digital Link Service ("ADL") to enterprise using "Class 4" and "Class 5 edge" long-distance switches. ADL is not a stand-alone local product but rather one that allows large enterprise AT&T long distance customers to add local voice traffic to their dedicated facilities that handle voice

and data transmission. This permits customers to maximize efficiency by using the same trunks for local, intraLATA, long distance and international calls. Customers that subscribe to ADL service use a DS1 or higher level facility and must also employ sophisticated customer premises equipment on their premises. The switches are not capable of providing service to mass market customers because they do not have the necessary connectivity (i.e., line-side analog ports), functionality (e.g., vertical features like call waiting and call forwarding), and network interconnection, including connection to Public Safety Answering Points. AT&T does not use unbundled network elements to provide ADL service.

The ADL capable (enterprise) switches identified in Attachment 1b are identified by their toll switch CLLI codes, which end in a "T". In the LERG these same switches appear using a psuedo CLLI code ending in "DS_" because the LERG will not accept the "T" code for a switch identified as having "end office functions" and having a "LRN".

The "Class 5 edge" long distance switches are either Lucent 5ESS or Nortel DMS switches. Both of these switch types are common in ILEC local networks. However, the switches used in the ILEC network to provide local services and the edge long distance switches in AT&T's network perform totally different functions.

Converting the edge switches to provide local services would require extensive hardware modifications, software modifications, and E911 Connectivity, as well as supporting OSS modifications and connectivity. As a practical matter, the modifications required preclude conversion of these switches.

For Example: The 5ESS and DMS would need to be completely rebuilt/retrofitted to support local services. Only the basic 5ESS and DMS platform (equipment racks, containers/cabinets, and some switch modules) could be reused. Modifications would include, but not limited to the following:

- OSS modifications (including loading of databases) and Connectivity to support Fault, Configuration, Account, Performance, and Security (FCAPS) Management, and other Operations, Administration,

Maintenance, and Provisioning (OAM&P) processes (e.g., LIDB and ISCP).

- Software and Switch Memory Upgrades (and additional RTU Licenses) to support the Vertical Features required to provide local service.
- Line Side Peripheral Hardware Upgrades to support local services.
- E911 Connectivity and Support.
- AIN support (software and connectivity) to support IN Triggers.
- Announcement System (Hardware, Software, and Transport Facilities).
- 105 Test Line Responder Units (Hardware & Software)
- Test Buss Control Unit (TBCU) to support MLT type loop testing functions (Hardware)
- Additional Facilities and Interfaces (Hardware) required for DCS and SONET Connectivity to the Network.
- Building of ODD (Office Dependent Data) which is unique to each switch and relates to translations (lines) and parameters (equipment) which consists of information related to switch owner (line, trunk, routing, charging, equal access, BRCS) and/or the office equipment (quantity, configuration, equipage). This makes up the office database.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 2: For each identified response in 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.

Response: See response to Interrogatory No. 1, *supra*.

Provided by: Jay Bradbury

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 3:	Identify any other switch not previously identified in Interrogatory No. 1 that AT&T 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 AT&T either on an unbundled or resale basis.
Response:	AT&T incorporates by reference its response to Interrogatory No. 1 as if fully set forth. Subject to the foregoing, none. Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 ("CILLI") 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 AT&T's use of the switch;
(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;

Response: No switches were identified in response to Interrogatory No. 3.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 do 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.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, **XXX Begin Confidential - Subject to Protective Agreement** [redacted]

End Confidential - Subject to Protective Agreement - Subject To Protective Agreement XXX.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, AT&T does not track line and voice grade equivalent (VGE) data or end user locations by ILEC wire center areas. In most instances, NPA-NXX data is provided which can be utilized to identify wire center areas. Also, system functions provide line and VGE data by product lines and services rather than in the aggregate. Attachment 6a provides derived VGEs for the LNS product line. These VGEs are then associated with city locations based on NPA-NXX. Services within the LNS product line are provisioned both via UNE-L and UNE-P. Current system capabilities do not allow disaggregation by provisioning method. Attachment 6b provides line counts for the AIO UNE-L product line based on LSO designation.
See Confidential Attachments 6a, and 6b.

Provided by: Mark Argenbright

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

The information requested is not available for AT&T local services provisioned exclusively via UNE-L. Confidential Attachment 13 contains a breakdown of the total AT&T-AIO

local product, which combines UNE-P and UNE-L. Services within the LNS product line are provisioned via UNE-L and UNE-P, however current system capabilities do not allow disaggregation by provisioning method or separation by end user and end user location in the manner requested in this Interrogatory.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, there were no switches identified in response to Interrogatory No. 3.

Provided by: Jay Bradbury

REQUEST:	Bellsouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 9:	For each ILEC wire center 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.
Response:	None. Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 10: With regard to the voice-grade equivalent lines identified by ILEC wire center area (or LEC exchange) in response to Interrogatory No. 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 lines;
(b) The number of end user customers to whom you provide two (2) voice-grade equivalent line;
(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;
(m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

Response: None.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 for a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Please refer to AT&T's response to Interrogatory 12.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 using an ILEC's switch either on an unbundled or resale basis.

Response: AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, **XXX Begin Confidential - Subject to Protective** [redacted]

End Confidential - Subject to Protective Agreement XXX.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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;

Response:

AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth.

Subject to the foregoing, see Confidential Attachment No. 13 for AIO local business. The information requested is not available by end user and end user location. Attachment 13 represents the overall total number of AIO local business lines within the requested ranges inclusive of UNE-P and UNE-L. Dissagregation by provisioning type is not available.

AT&T Consumer Local UNE-P no data available

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

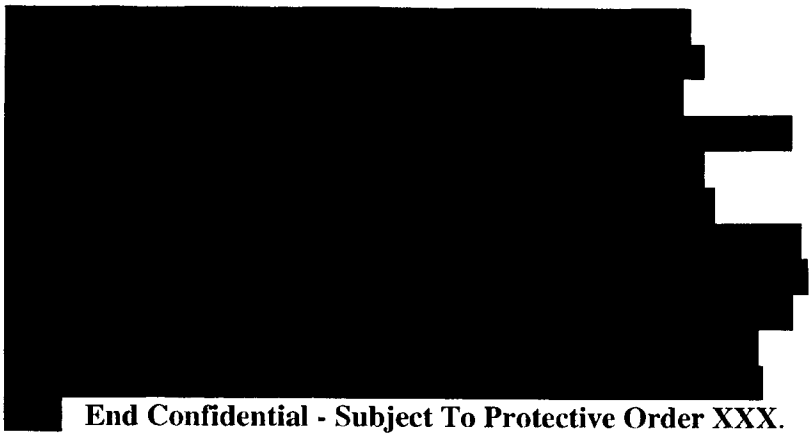
DATED: October 24, 2003

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 of the BellSouth region? If the answer to this Interrogatory is in the affirmative, for each switch that you use 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 DMS 100.)
(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 to or relating to the rates, terms and conditions of AT&T's provision of switching capability.

Response: Specifically with respect to subpart (f), AT&T objects on the basis that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Documents referring to the terms of AT&T's provisioning of switching for Comcast are not relevant given the prior explanation.

AT&T incorporates by reference its response to Interrogatory No. 1, as if fully set forth. Subject to the foregoing, and without waiving any objection, AT&T does not offer wholesale unbundled switching to other carriers. **XXX Begin Confidential - Subject to Protective Agreement -** [redacted]



End Confidential - Subject To Protective Order XXX.

Provided by: Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 15: Identify every business case in your possession, custody or control that evaluates, analyzes or otherwise refers or relates to the offering of a qualifying service using:

> (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioning switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

Objection: AT&T objects to this interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence.

Pursuant to the *Procedural Order*, the Triennial Review Order, and Rules 26.02 and 33.01 of the Tennessee Rules of Civil Procedure, and Rule 1220-1-2.11 of the Rules of Practice and Procedure of the TRA, to the extent that this interrogatory requests specific financial, business or proprietary information regarding AT&T's economic business model, AT&T objects to providing or producing any such information on the grounds that those requests presume that the market entry analysis is contingent upon AT&T's economic business model instead of the hypothetical business model contemplated by the Triennial Review Order. The Triennial Review Order explicitly contemplates that in considering whether a competing carrier economically can compete in a given market without access to a particular unbundled network element, the TRA must consider the likely revenues and costs associated with the given market based on the *most efficient business model* for entry rather than to a *particular carrier's business model.* TRO at ¶326. In particular, the FCC stated:

> In considering whether a competing carrier could economically serve the market without access to the

> incumbent's switch, the state commission must also consider the likely revenues and costs associated with local exchange mass market service . . . The analysis must be based on the *most efficient business model* for entry rather than to any *particular carrier's business model.*

Id. [emphasis added]. Additionally, with respect to economic entry, in ¶517, the FCC stated that ". . . [t]he analysis must be based on the most efficient business model for entry rather than to any particular carrier's business model." Furthermore, in Footnote 1579 of Paragraph 517, the FCC clarified that ". . . [s]tate commissions should not focus on whether competitors operate under a cost disadvantage. State commissions should determine if entry is economic by conducting a business case analysis for an *efficient entry.*" [emphasis added].

In addition to these statements, the FCC also made numerous other references to the operations and business plans of an efficient competitor, specifically rejecting a review of a particular carrier's business plans or related financial information. See, ¶84, Footnote 275 ("Once the UNE market is properly defined, impairment should be tested by asking whether *a reasonable efficient CLEC* retains the ability to compete even without access to the UNE.") (citing BellSouth Reply, Attachment 2, Declaration of Howard A. Shelanski at ¶2 (emphasis added)). See also, TRO at ¶115; ¶469; ¶485, Footnote 1509; ¶517, Footnote 1579; ¶519, Footnote 1585; ¶520, Footnotes 1588 and 1589; ¶581, and Footnote 1788.[1]

Accordingly, the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor.* As a result,

[1] For the Authority's convenience, please see Attachment 1 that sets forth the text of these relevant Paragraphs and Footnotes from the *TRO. Complete text of the Triennial Review Order is available @ www.fcc.gov.*

discovery of AT&T's financial information or business plans will not lead to the discovery of admissible evidence in this proceeding.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Objection:	AT&T incorporates its objection to Interrogatory No.15 as if fully set forth.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Objection	AT&T incorporates by reference its objections to Interrogatory15 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: No.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: AT&T offers a qualifying service in every MSA in Tennessee.

Provided by: Jay Bradbury

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 20:	If you are offering 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 those areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, or resale.
Response:	See Attachment 20 MSAs and non-MSAs for all 9 states in the BellSouth region. AT&T offers a qualifying service (local) in all areas depicted except as described in AT&T's Response to BellSouth's First Set of Interrogatories in Florida Docket 030851-TP served October 31, 2003.
	Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify the 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 such service is provided.

Response: AT&T incorporates it's response to Interrogatory No. 1. Subject to the foregoing, qualifying services offered by AT&T "including the rates, terms, and conditions under which services are offered" can be found in AT&T's publicly available tariffs on file with the Tennessee Regulatory Authority. Additionally, information regarding these services are available at **http://ccpkms.ims.att.com/tariffs/indes.html** While the website does prompt the input of a telephone number, AT&T has stated in response to previous Interrogatory responses the geographic areas where these services are available.

Provided by: Jay Bradbury

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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, or resale, or in some other fashion.
Response:	AT&T incorporates its responses to Interrogatory Nos. 1. Subject to the foregoing, AT&T offers long distance services statewide in the state of Tennessee.
	Provided by: Jay Bradbury

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 23:	If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas ether 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.
Response:	See response to No. 22.
	Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify the 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 such service is provided.

Response: AT&T incorporates its responses to Interrogatory No. 1, as if fully set forth herein. Given the vague and indefinite definition of non-qualifying services, AT&T cannot provide a description of all of the non-qualifying services it offers. AT&T provides long distance services statewide. A description of those services is publicly available at AT&T's website. **http://ccpkms.ims.att.com/tariffs/index.html**. Follow appropriate link for Intra-State and Inter-State Tariffs.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 25: Please state the total number of end user customers in the State of Tennessee to whom you only provide qualifying service.

Response AT&T incorporates its responses to Interrogatory No. 1. Subject to the foregoing:

The total number of end user customer's in Tennessee to whom AT&T provides qualifying service (local only) for AT&T AIO Business is **XXX Begin Confidential - Subject to Protective Agreement –** [redacted] **- End Confidential - Subject to Protective Agreement XXX**

The total number of end user customer's in Tennessee to who AT&T provides qualifying service (local only) for AT&T Consumer Local is not available at this time. Please see response to Interrogatory No. 12. AT&T will supplement its response to this Interrogatory as this information becomes available.

Please see Confidential Attachment 25

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 26: For those end user customers to whom you provide qualifying service in the state of Tennessee, please state the average monthly revenues you receive from each end-user customer.

Objection: AT&T incorporates its objection to Interrogatory No. 15, *supra.*

AT&T does not gather and maintain revenue data in the manner requested. Subject to the foregoing: Monthly revenue per line for AT&T Business local services is shown on Confidential Attachment 26 which provides the total revenue (w/o taxes) per line for AT&T AIO local business product. For AT&T Consumer Local qualifying services, data responsive to this request is not available for 90 to 120 days from date AT&T began offering service. Please see response to Interrogatory Nos. 12 and 25.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response AT&T incorporates by reference its response to Interrogatory No. 1 as if fully set forth.

Subject to the foregoing, and without waiving any objection, the average number of lines per end user customer for AT&T AIO business local is shown on Confidential Attachment 26.

For AT&T Consumer Local –UNE-P data responsive to this request is not currently available. Please see response to Interrogatory No. 12.

Provided by: Jay Bradbury

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 28: Please state the total number of end user customers in the State of Tennessee to whom you provide only non-qualifying service.

Response By agreement o the parties, no response to this Interrogatory is required.

Provided by: Jay Bradbury

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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 customer.
Response	By agreement of the parties, no response to this Interrogatory is required.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 30: Please state the total number of end user customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service;

Response AT&T incorporates by reference its response to Interrogatory No.1 as if fully set forth. Subject to the foregoing, and without waiving any objection. **XXX Begin Confidential - Subject to Protective Agreement -** [redacted] **End Confidential - Subject to Protective Agreement XXX**

For AT&T Consumer Services, this information is not currently available. Please see response to Interrogatory No. 12.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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

Response: AT&T incorporates its responses to Interrogatory No 15, *supra.*

AT&T does not gather and maintain revenue data in the manner requested. Attachment 26 provides the total revenue (w/o taxes) per line for AT&T AIO local business product.

For AT&T Consumer Services, this information is not currently available. Please see response to Interrogatory No. 12.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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 customer.
Response	Please refer to Response to Interrogatory Number 27.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 33: Please provide a breakdown of the total number of end user customers served by AT&T 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 that classification so that it can be determined what kinds of customers you have in each classification.)

Response: See responses to Interrogatory Nos. 6, 7, 11, and 12.

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[redacted]

[redacted]

End Confidential - Subject to Protective Agreement -XXX

AT&T Consumer Local:
This product line serves both residential and small business customers via UNE-P. No data is available responsive to this request. Please see response to Interrogatory No. 12.

Provided by: Mark Argenbright

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Response:	AT&T incorporates its responses to Interrogatory #15, *supra*. AT&T will supplement its response to this Interrogatory.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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 fore each month from January 2000 to the present.
Objection	AT&T incorporates its responses to Interrogatory No 15, *supra*. AT&T will supplement its response to this Interrogatory

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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 that you have obtained. Please provide this information from January 2000 to the present.
Response	AT&T, like BellSouth, relies on industry publications assessing "market shares." Upon information and belief, BellSouth has possession, custody, or control of those same industry publications.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Response	AT&T, like BellSouth, relies on industry publications assessing "market shares." Upon information and belief, BellSouth has possession, custody, or control of those same industry publications.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 38:	Identify any documents in your possession, custody or control that evaluate 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.
Response	AT&T incorporates its objection to Interrogatory No. 15, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 effort in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

Response AT&T incorporates its objection to Interrogatory No. 15, *supra*.

Subject to the foregoing, and without waiving any objection, AT&T uses a variety of marketing methods including, but not limited to: direct telemarketing sales, direct marketing (i.e., "feet on the street") and direct mail. These functions are primarily provided through contracts with independent firms using material developed by AT&T Business Services and Consumer Services Product Teams.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 40: How do you determine whether you will serve an individual customer's location with multiple DS0s 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 you would consider in making this type of decision.

Response AT&T uses a variety of factors to determine the type of facilities it uses to serve a particular customer location. First, because of the operational and economic impairments relating to the use of UNE-L, AT&T primarily uses UNE-P to serve small business customers requiring multiple DSO analog lines. Other criteria AT&T uses to determine the use of a DS1 facility include: (a) the costs of acquiring and providing the DS1-loop (including all NRCs) as compared to the costs of DS0 facilities; (2) the cost of providing digitization equipment (channel bank), and back up power at the customer location, including purchase price, installation and maintenance of the equipment; (3) the ability of AT&T to recover the equipment and other costs over the term of the customer's service.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 41:	Is there a typical or average number of DSOs at which you would choose to serve a particular customer with a DS1 or larger transmission system? All other things being equal? If so, please describe that typical or average number and explain how that number was derived.
Response	The determination to use a DS1 facility is based on a case-by case analysis of the factors described in response to Question 40 above, and differs based on the underlying cost of facilities purchased from the ILEC and geographic differences in labor or other expenses.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 42: What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on the network side pf the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DSOs 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.)

Response: In order to utilize a DS1 facility to provision service to a customer utilizing CPE that is not compatible with digital service, AT&T must install additional equipment including a D4 channel bank (or its equivalent), a Data Service Unit/Channel Service Unit (DSU/CSU), and, if necessary to ensure continuous service, battery back up. To the extent the equipment does not include trouble sectionalization functionality, a smart jack/NID may also be required. AT&T will supplement its response to this Interrogatory with respect to average cost of equipment required.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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?

Response: AT&T incorporates its objections to Interrogatory No 15, *supra* and notes that the FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of AT&T or any other *particular competitor.*

Subject to the foregoing, and without waiving any objections, AT&T states the following:

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REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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?

Objection: AT&T incorporates its objections to Interrogatory No15, *supra* and notes that the FCC's *TRO* specifically contemplates the consideration of financial and related information of an *efficient "model" competitor* and not that of AT&T or any other *particular competitor.*

Subject to the foregoing, and without waiving any objections, AT&T states:

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[redacted]

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REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 to evaluate the project?

Objection: AT&T incorporates its objections to Interrogatory No. 15, *supra* and notes that the FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of AT&T or any other particular competitor.

Accordingly, AT&T's determination of whether to offer a "qualifying service in a particular geographic market" and the time periods involved in such evaluation are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing, AT&T will supplement its response to this Interroga

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 46:	Provide your definition of sales expense as that term is used in your business.
Response:	See Attachment No. 46.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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?
Response:	AT&T incorporates its objections to Interrogatory No. 15, *supra.* Subject to the foregoing and without waiving any further objections, AT&T will supplement with a response to this Interrogatory.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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

Response: See Attachment No. 48.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 49:	Based on the definitions 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.
Response:	AT&T incorporates its objections to Interrogatory No. 15, *supra*. Subject to the foregoing, and without waiving any objections, AT&T will supplement its response to this Interrogatory.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 50:	For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for AT&T in each state in BellSouth's region.
Response:	Upon information and belief, BellSouth is in possession of documents and other information requested in Interrogatory Nos. 50 and 51. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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, AT&T, 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 AT&T complained in writing to BellSouth or anyone else.

Response: Upon information and belief, BellSouth is in possession of documents and other information requested in Interrogatory Nos. 50 and 51. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 52:	Does AT&T 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 ort otherwise refer or relate to this preferred process.
Response:	Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 53: Does AT&T 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.

Response: AT&T's preferred process allows the provisioning of loops used for local service to be operationally and competitively neutral, making it the local service counterpart of "equal access" in the long-distance market. This is a process that AT&T has generically referred to as "electronic loop provisioning" ("ELP"). In this environment, consumers would be able to change their local carrier seamlessly, and no carrier would have an inordinate advantage in competing for a mass market customer's business. Implementation of such an electronic provisioning process would create permanent virtual circuits that could use software commands to shift loops from one carrier to another quickly and inexpensively, with no loss or degradation of service.

See also Attachment No. 53.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 54: State whether AT&T agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 15, 2001 Memorandum of Understanding. If AT&T does not agree, explain why and explain AT&T's view of its involvement in the development of that process.

Response: Yes, AT&T agrees that it jointly developed the process described, *supra*. Additionally, it tried in good faith to use the process. However, due to continuing operational difficulties, customer dissatisfaction, and prohibitively high costs, AT&T severely curtailed its use later in 2001. For example, according to BellSouth's performance data, AT&T only completed 30 hot cut orders for the entire nine-state region in December 2001. Further, this process was developed for use of UNE-L as one means of acquiring mass market customers and was not developed contemplating its use in an environment without access to local unbundled switching.

Provided by: Denise Berger

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 55:	If AT&T has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in AT&T's process that differs from BellSouth's process.
Response:	See response to Interrogatory No. 53, *supra*.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 56:	If AT&T has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in AT&T's process that differs from BellSouth's process.
Response:	In responding to this Interrogatory, AT&T assumes that BellSouth is referring to the batch hot cut process as defined in BellSouth's First Set of Interrogatories to AT&T. Accordingly, see response to Interrogatory No. 52.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 57: Does AT&T 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.

Response: See response to Interrogatory No. 53, *supra* for AT&T's preferred individual migration process. AT&T does not have a specific rate at this time, but as a fully electronic solution, it should be no more expensive than a UNE-P or PIC change.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 58: Does AT&T 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.

Response: In responding to this Interrogatory, AT&T assumes that BellSouth is referring to a batch hot cut process as defined in BellSouth's First Set of Interrogatories to AT&T. That being the case, AT&T does not have a specific batch rate at this time. However, guidance provided by the FCC suggests that it should be 1) based on TELRIC, TRO at ¶489, low cost, Id. at ¶489, lower than current rates, Id. at ¶487, and comparable to UNE-P, Id. at ¶512, Footnote 1574. See also response to Interrogatory No. 78, *infra*.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 59: What is the largest number of individual hot cuts that AT&T 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.

Response: The requested information is in the possession, custody and control of BellSouth. Assuming BellSouth will provide such information and documentation to AT&T, AT&T will confirm or deny the information contained in BellSouth's records.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 60:	Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to AT&T or that AT&T 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.
Response:	See AT&T's response to Interrogatory No. 64, *infra*.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 61:	Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.
Response:	AT&T incorporates its response to Interrogatory No.52 as if fully set forth. No ILEC has established a cost for a batch hot cut process in BellSouth's region. Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 62:	Does any ILEC in the BellSouth Region have an individual hot cut process that is acceptable to AT&T or that AT&T 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.
Response:	No ILEC in the BellSouth Region has an individual hot cut process that is acceptable to AT&T. Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 63:	Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.
Response:	No ILEC has an acceptable rate for an individual hot cut process in BellSouth's region. Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 64: Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to AT&T or that AT&T 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.

Response: ILECs have just begun to provide components or outlines of proposed batch processes in workshops throughout the country; therefore, AT&T does not have sufficient information to respond at this time. However, previous project or bulk processes did have components that were superior to BellSouth's process. For example, Verizon-NY and SBC have "bulk" provisioning processes and allow time specific migrations. Further, Verizon has in place an electronic communications system which offers some advantages over manual phone calls or faxes.

Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 65:	Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.
Response:	AT&T incorporates its response to Interrogatory Nos. 52 and 64 as if fully set forth.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 66:	Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to AT&T or that AT&T 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.
Response:	Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 67:	Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to AT&T? If so, name the ILEC and provide the rate and the source of the rate.
Response:	Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 68: Does AT&T order coordinated or non-coordinated hot cuts?

Response: AT&T has ordered both coordinated and non-coordinated cuts.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 69: Does AT&T use the CFA database?

Response: Yes.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 70: Identify every issue related to BellSouth's hot cut process raised by AT&T at the Florida CLEC collaborative since October 2001.

Response: Due to the high costs and operational issues of hot cuts (see Attachment 70), AT&T has purchased minimal numbers of hot cuts since that period of time. For example, based on BellSouth's PMAP reports, BellSouth completed 298 (regionally) hot cut LSRs in October 2001, but only 18 in October 2002. Based in part on the above complications, AT&T has focused on other modes of market entry. Therefore, AT&T has not used this forum for hot cut issues, but has primarily focused instead on issues that are most relevant to modes of entry used by AT&T.

See Attachment 70A for issues raised by AT&T in the Florida collaborative. It should also be noted that other CLECs raised issues that were of interest to AT&T, making it unnecessary for AT&T to engage in any duplicative efforts.

Provided by: Sharon Norris

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: AT&T incorporates its response to Interrogatory No. 52 as if fully set forth.

In addition, AT&T is currently without sufficient information to answer this interrogatory with an exact volume or number. Furthermore, AT&T refers BellSouth to ¶489 of the TRO and asserts that the appropriate volume of loops must meet the operational and economic models as defined by the FCC and the TRO. In other words, the requisite volume of loops to meet the TRO and the FCC Rule cited above is that amount required to support demand created by the additional volume of customers added as a result of the implementation of the FCC's TRO, and to ensure unconstrained future growth of competition post TRO implementation.

Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Response:	AT&T incorporates its response to Interrogatory No. 52 as if fully set forth.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 73: If AT&T disagrees with BellSouth's individual hot cut process, identify every step that AT&T contends is unnecessary and state with specificity why the step is unnecessary.

Response: See response to Interrogatory No. 53, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 74: If AT&T disagrees with BellSouth's bulk hot cut process, identify every step that AT&T contends is unnecessary and state with specificity why the step is unnecessary.

Response: AT&T disagrees with, at a minimum, the following aspects of BellSouth's process, even as an interim batch process to be used in narrow, tailored circumstances. :

a. It does not appear to be a batch provisioning process, i.e. all the orders are not provisioned at the same time, or even on the same day.

b. It does not permit time specific cuts.

c. It does not allow coordinated cuts if a change of facilities is required.

d. It does not allow after-business-hours cuts, which are necessary to meet customers need to have uninterrupted telephone phone service during business hours.

e. There is no assurance that services requested by the CLEC to be migrated on the same "batch" order will in fact be worked on the same day, undermining significantly the ability of the CLEC to impact the quality and timing of the cut-over. Indeed, BellSouth appears to provision its batch orders no differently than its individual orders.

f. There is no assurance that all of an individual customer's lines will be cut on the same day, creating further customer satisfaction issues. For example, BellSouth could create groups of lines to migrate that included some of one customer's lines and some of another customer's lines but not all of either customer's lines.

g. BellSouth is unwilling to commit to the number of lines or customers it will provision per day.

h. BellSouth's process does not provide for any additional safeguards, such as real-time communication between the two companies during the conversion process, or a process for timely service restoration in the event of a problem.

i. There are no cost savings to the CLEC from using this process.

Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 75:	Identify by date, author and recipient every written complaint AT&T has made to BellSouth regarding BellSouth's hot cut process since October 2001.
Response:	See Attachment No. 75. See also response to Interrogatory No. 70. Provided by: Sharon Norris

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 76:	How many unbundled loops does AT&T contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?
Response:	See response to Interrogatory No. 71, *supra*.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 77: What is the appropriate information that you contend the Tennessee Regulatory Authority 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 51.310(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

Response: The FCC's TRO ¶512 and Footnote 1574 outlines the overall or high level criteria that the Tennessee Regulatory Authority should consider when evaluating the question posed in Interrogatory No. 77.

In addition to the above, discovery in this case is continuing in nature and the response to this interrogatory may evolve as AT&T formulates the case it will present before the Commission

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 78: What is the average completion interval metric for provision of high volumes of loops that you contend the Tennessee Regulatory Authority 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.

Response: The FCC's TRO ¶512 and Footnote 1574 outlines the overall or high level criteria that the Tennessee Regulatory Authority should consider when evaluating the question posed in Interrogatory #78. According to the FCC's Rules and the TRO, the average completion interval metric for provision of high volumes of loops must be, at a minimum, equal to the order completion interval for UNE-P. See, TRO ¶512, Footnote 1574.

In addition to the above, discovery in this case is continuing in nature and the response to this interrogatory may evolve as AT&T formulates the case it will present before the Commission.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 79: What are the rates that you contend the Tennessee Regulatory Authority should adopt inn 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.

Response: As indicated in the FCC Rule referenced above, rates must be set in accordance with the FCC UNE Pricing Rules. Furthermore, pursuant to ¶470 of the TRO, rates must be sufficiently low to overcome "impairment" and to allow CLECs to overcome the economic barriers associated with the hot cut process. See also response to Interrogatory No. 59, *supra*.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
Interrogatory 80:	What are the appropriate product market(s) that you contend the Tennessee Regulatory Authority 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.
Response:	Discovery in this case is continuing in nature and any response to this interrogatory is premature. AT&T is in the process of formulating the case it will present before the Commission and has not formulated a response to this interrogatory at this early stage in the proceeding.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 81: What are the appropriate geographic market(s) that you contend the Tennessee Regulatory Authority 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.

Response: See response to Interrogatory No. 80.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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.

Response: See response to Interrogatory No. 80.

REQUEST:	BellSouth First Set of Interrogatories
DATED:	October 24, 2003
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.
Response:	See response to Interrogatory No. 80.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

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 multilane end users at a single location that the Tennessee Regulatory Authority 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.

Response: See response to Interrogatory No. 80.

SUBMITTED this 30th day of November, 2003.

BOULT CUMMINGS CONNERS & BERRY

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Attorney for AT&T Communications of
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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

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ATTACHMENT
TO
INTERROGATORY NO. 1

AT&T PROPRIETARY

	A&T Local Switches in Tennessee									
				Switch Address						
	Switch	Market	Switch CLLI	Street	City	State	Switch Class	Switch Man.	Installed T1 Capacity	% Utilization
1	Chattanooga				Chattonooga	TN	DMS	Nortel		
2	Knoxville				Knoxville	TN	DMS	Nortel		
3	Nashville				Nashville	TN	DMS	Nortel		

	Switch ADL-Capable	Switch CLLI	City	State	Switch Class	Switch Man.	Assigned T1 Capacity	Equipped T1 Capacity
1	YES	CLMASCTL03T	Columbia	SC	4ESS	Lucent		
2	YES	CLMASCTL04T	Columbia	SC	5ESS	Lucent		

ATTACHMENT
TO
INTERROGATORY NO. 5b

AT&T PROPRIETARY

	AT&T's Local Switches									AT&T's On-Net and Off-Net Collocation Cages, by Switch							
													Address		V&H Coordinates			
	Switch Name	Market	Switch CIII		City	State	Switch Type	Manufacturer		CLLI	CLLI 3		CO Name	State	V	H		# of OC48s
	Birmingham	Birmingham	BRHMALPODS0		Birmingham	AL	DMS	Northern Telecom		BRHMALMT	XIY		BIRMINGHAM	AL	751800	244600	On-Net	4
										BRHMALMT	XJY		BIRMINGHAM	AL	751800	244800	On-Net	*
										BRHMALCH	1MD		BIRMINGHAM-CAHABA HE	AL	752200	742700	Off-Net	0
										BRHMALOX	6MD		OXMOOR	AL	753400	244400	Off-Net	0
										BRHMALRC	CMD		RIVERCHASE	AL	754500	242900	Off-Net	0
																	AL Total	4
M1	Jacksonville	Jacksonville	JCVLFLGHDS0		Jacksonville	FL	5ESS	Lucent		JCVLFLCL	XIY		JACKSONVILLE	FL	764800	127600	On-Net	2
	Jacksonville	Jacksonville	JCVLFLCLDS0		Jacksonville	FL	DMS	Northern Telecom		JCVLFLCL	XXX		JACKSONVILLE	FL	764800	127600	On-Net	*
										JCVLFLSM	NMD		JACKSONVILLE	FL	765200	127200	On-Net	1
										JCVLFLSM	4MD		JACKSONVILLE	FL	765200	127200	On-Net	1
										JCVLFLSJ	GMD		SAN JOSE	FL	765800	126200	Off-net	0
	Miami-1	Miami	NMIAFLAYDS0		North Miami	FL	5ESS	Lucent		MIAMFLAE	1MD		ALHAMBRA	FL	836200	53600	On-Net	3
	Miami-3	Miami	OJUSFLTLDS3		Ojus	FL	DMS	Northern Telecom		MIAMFLAE	WA1		ALHAMBRA	FL	836200	53600	On-Net	*
										MIAMFLGR	VMD		GRANDE	FL	835100	52800	On-Net	6
										MIAMFLGR	WA1		GRANDE	FL	835100	52800	On-Net	*
										MIAMFLHL	3MD		HIALEAH	FL	834300	55900	On-Net	1
										MIAMFLPB	5MD		POINCIANA	FL	835200	54800	On-Net	
										MIAMFLPL	5MD		PALMETTO	FL	836100	55700	On-Net	1
										MIAMFLAP	2MD		MIAMI AIRPORT	FL	835400	54600	Off-net	0
										MIAMFLCA	9MD		CANAL	FL	837400	55200	Off-net	0
										MIAMFLRH	5MD		red road	FL	837200	53700	Off-net	0
										MIAMFLWM	8MD		MIAMI WEST	FL	836400	54500	Off-net	0
										NDADFLOL	3MD		NDAD-OLETA	FL	831300	54000	Off-net	0
	Miami-2	Miami	FTLDFLOVDS3		Ft Lauderdale	FL	5ESS	Lucent		BCRTFLBT	WA1		BOCA RATON	FL	822500	58200	On-Net	2
										BCRTFLBT	RMD		BOCA RATON	FL	822500	58200	On-Net	*
										BCRTFLMA	3MD		BOCA RATON	FL	823400	57300	On-Net	1
										FTLDFLCY	6MD		FT LAUDERDALE CYPRES	FL	826700	56400	On-Net	2
										FTLDFLCY	PMD		FT LAUDERDALE CYPRES	FL	826700	56400	On-Net	*
										FTLDFLCY	WA1		FT LAUDERDALE CYPRES	FL	826700	56400	On-Net	1
										FTLDFLJA	6MD		FTLD JACARANDA	FL	829800	58100	On-Net	1
										FTLDFLMR	DMD		FORT LAUDERDALE MAIN	FL	828100	55800	On-Net	3
										FTLDFLMR	WA1		FORT LAUDERDALE MAIN	FL	828100	55800	On-Net	*
										FTLDFLOA	3MD		OAKLAND	FL	828000	57300	On-Net	2
										FTLDFLPL	QMD		PLANTATION	FL	828800	56800	On-Net	3
										FTLDFLPL	WA1		PLANTATION	FL	828800	56800	On-Net	*
										HLWDFLMA	05M		HOLLYWOOD MAIN	FL	830100	54600	On-Net	2
										HLWDFLMA	WA1		HOLLYWOOD MAIN	FL	830100	54600	On-Net	*
										PMBHFLPE	3MD		POMPANO BEACH	FL	825400	56500	On-Net	1
										PMBHFLMA	6MD		MAGATE	FL	826400	58000	On-Net	2
										WPBHFLAN	WA7		MAIN ANNEX	FL	816200	60600	On-Net	2
										WPBHFLAN	XCX		MAIN ANNEX	FL	816200	60600	On-Net	*
										WPBHFLHH	3MD		HAVERHILL	FL	817100	61800	On-Net	2
										WPBHFLHH	WA1		HAVERHILL	FL	817100	61800	On-Net	*
										BCRTFLBT	6MD		BOCA TEECA	FL	822500	58200	Off-Net	0
										BCRTFLMA	4MD		RATON MAIN	FL	823400	57200	Off-Net	0
										DRBHFLMA	6MD		DEERFIELD BEACH MAIN	FL	824200	57200	Off-Net	0
										HLWDFLPE	7MD		PEMBROKE PINES	FL	831600	56700	Off-Net	0
										HLWDFLWH	AMD		WEST HOLLYWOOD	FL	831000	55700	Off-Net	0
M1	Pompano Beach	Miami (Pompano Beach)	PMBHFLEODS0		Pompano	FL	5ESS	Lucent		Customers--no LNS fiber into South								
	Orlando	Orlando	ORLEFLGVDS0		Orlando	FL	5ESS	Lucent		ALSPFLXA	H19		ALTAMONTE SPRINGS XA	FL	792900	104300	On-Net	1
										ORLDFLMA	WAL		ORLD-MAGNOLIA	FL	795400	103200	On-Net	2
										ORLDFLMA	XTY		ORLD-MAGNOLIA	FL	795400	103200	On-Net	*
										ORLDFLPC	7MD		ORLD-PINECASTLE	FL	796800	102200	On-Net	2
										ORLDFLSA	AMD		SAND LAKE	FL	796900	101800	On-Net	1
										WNPKFLXA	H29		WINTER PARK	FL	794200	103400	On-Net	1
										ORLDFLAP	CMD		AZEALEA PARK	FL	794600	101600	Off-Net	0
										ORLDFLPH	HMD		PINE HILLS	FL	795500	104800	Off-Net	0
										SNFRFLMA	4MD		SANFORD MAIN	FL	789500	104400	Off-Net	0
	Tampa	Tampa	TAMQFLRVDS0		Tampa	FL	5ESS	Lucent		BHPKFLXA	W08		Beach Park	FL	818000	115700	On-Net	
										CLWRFLXA	W12		Clearwater	FL	820200	120300	On-Net	
										SWTHFLXA	W03		SWEETWATER	FL	817400	117000	On-Net	2
										TAMPFLXA	W21			FL	817200	114700	On-Net	2
										TAMPFLXE	W11		TAMPA-MAIN	FL	816000	113500	On-Net	1
										TAMPFLXX	W04		Tampa EAX	FL	817200	114700	On-Net	1
										WSSDFLXA	W12		WESTSIDE	FL	817500	115600	On-Net	2
										PNLSFLXA	W07		Pinellas	FL	820600	118900	Off-Net	
										SPBGFLXA	W10		ST. PETERSBURG	FL	822500	115900	Off-Net	0
										SWTHFLXA	W11		SWEETWATER	FL	817400	117000	Off-Net	0
																		54

	Atlanta-1	Atlanta	NRCRGAISDS0	[redacted]	Norcross	GA	DMS	Northern Telecom	[redacted]	ALPRGAMA	BMD	[redacted]	ALPHARETTA-MAIN	GA	718600	210300	On-Net	3	[redacted]
										ALPRGAMA	WB1		ALPHARETTA-MAIN	GA	718600	210300	On-Net	*	
										DNWDGAMA	7MD		DUNWOODY	GA	721900	209600	On-Net	1	
										DNWDGAMA	WA1		DUNWOODY	GA	721900	209600	On-Net	1	
										LLBNGAMA	WA1			GA	721100	206000	On-Net	1	
										MRTTGAMA	DMD		MARIETTA MAIN	GA	723700	213100	On-Net	1	
										MRTTGAMA	SMD		MARIETTA MAIN	GA	723700	213100	On-Net	1	
										MRTTGAMA	WC1		MARIETTA MAIN	GA	723700	213100	On-Net	1	
										NRCRGAMA	4MD		norcross	GA	720900	207600	On-Net	5	
										NRCRGAMA	WA1		norcross	GA	720900	207600	On-Net	*	
										RSWLGAMA	WB1		ROSWELL MAIN	GA	720700	210900	On-Net	1	
										SMYRGAMA	AMD		SMYRNA	GA	724600	211800	On-Net	1	
										SMYRGAMA	WB1		SMYRNA	GA	724600	211800	On-Net	1	
										SMYRGAPF	HMD		POWER FERRY	GA	723700	211300	On-Net	2	
										SMYRGAPF	HMD		POWER FERRY	GA	723700	211300	On-Net	*	
										TUKRGAMA	9MD		TUCKER MAIN	GA	722700	206900	On-Net	1	
										TUKRGAMA	9MD		TUCKER MAIN	GA	722700	206900	On-Net	1	
										CHMBGAMA	8MD		CHAMBLEE MAIN	GA	722500	208400	Off-Net	0	
										CNYRGAMA	7MD		CONYERS-MAIN	GA	724300	201800	Off-Net	0	
										DLTHGAHS	7MD		DULUTH	GA	719100	207200	Off-Net	0	
										LRVLGAOS	8MD		LAWERENCVILLE MAIN	GA	718600	204400	Off-Net	0	
										NRCRGAMA	HMD		norcross	GA	720900	207600	Off-Net	0	
										SMYRGAPF	JMD		POWER FERRY	GA	723700	211300	Off-Net	0	
	Atlanta-2	Atlanta	ATLNGATLDS7		Atlanta	GA	DMS	Northern Telecom		ATLNGABU	NMD		BUCKHEAD	GA	724300	209200	On-Net	3	
										ATLNGABU	NMD		BUCKHEAD	GA	724300	209200	On-Net	*	
										ATLNGACS	WK1		COURTLAND STREET	GA	725900	208400	On-Net	4	
										ATLNGACS	XHX		COURTLAND STREET	GA	725900	208400	On-Net	*	
										ATLNGAEP	6MD		EAST POINT	GA	728000	208500	On-Net	3	
										ATLNGAEP	WA1		EAST POINT	GA	728000	208500	On-Net		
										ATLNGAPP	WD1		PEACHTREE PLACE	GA	725500	208800	On-Net	1	
										ATLNGAPP	ZMD		PEACHTREE PLACE	GA	725500	208800	On-Net		
										ATLNGASS	WB1		SANDY SPRINGS	GA	723200	209900	On-Net		
										ATLNGATH	CMD		TOCO HILLS	GA	724100	208000	On-Net	1	
										ATLNGATH	WA1		TOCO HILLS	GA	724100	208000	On-Net	?	
										ATLNGABU	XDX		BUCKHEAD	GA	724300	209200	Off-Net	0	
										ATLNGACS	XMX		COURTLAND STREET	GA	725900	208400	Off-Net	0	
										ATLNGASS	BMD		SANDY SPRINGS	GA	723200	209900	Off-Net	0	
										ATLNGASS	CMD		SANDY SPRINGS	GA	723200	209900	Off-Net	0	
M1	Stone Mountain (Atl.)	Atlanta	SNMTGAASDS0		Stone Mountain	GA	5ESS	Lucent		Customers--no LNS liber info this lo									
M1	Vinings (Atl.)	Atlanta	ATLAGAQWDS0		Atlanta	GA	5ESS	Lucent		Customers--no LNS liber into this lo									
																		33	
M1	(Ownership of KY Switch transferred to Comcast. AT&T leases cages and recovers costs from Comcast on per line basis)					KY				LSVLKYAP	XDX		LOUISVILLE- ARMORY P	KY	652800	277300	On-Net	1	
										LSVLKYAP	XXX		LOUISVILLE- ARMORY P	KY	652800	277300	On-Net	1	
										LXTNKYXA	W24		LEXINGTON	KY	646000	256200	On-Net	1	
	Charlotte	Charlotte	CHRLNCNADS0		Charlotte	NC	DMS	Northern Telecom		CHRLNCBO	GMD		CHARLOTTE-SOUTH BLVD	NC	667000	169800	On-Net	1	
										CHRLNCCA	XUX		CHARLOTTE-CADWELL	NC	665700	109800	On-Net	4	
										CHRLNCDE	DMD		CHARLOTE DERITA	NC	664000	170000	On-Net	1	
										CHRLNCRE	4MD		CHARLOTTE (REID)	NC	667400	169000	On-Net	1	
										CHRLNCSH	5MD		SHARON AMITY	NC	666400	168700	On-Net	1	
										CHRLNCUN	5MD		CHAROLTTE-UNIVERSITY	NC	663300	169700	On-Net	1	
										CHRLNCCE	EMD		CENTRAL	NC	665200	168400	Off-net	0	
										CHRLNCTH	AMD		CHARLOTTE THOMASBORO	NC	665700	171000	Off-net	0	
										GSTANCSO	CMD		GASTONIA	NC	668300	175400	Off-net	0	
	Greensboro	Greensboro	GNBONCEUDS4		Greensboro	NC	DMS	Northern Telecom		GNBONCAS	GMD		GREENSBORO-ASHLAND	NC	640800	164700	On-Net	1	
										GNBONCEU	DMD		EUGENE	NC	640200	163900	On-Net	2	
										WNSLNCFI	5MD		WINSTON SALEM-FIFTH	NC	644000	171100	On-Net	1	
										BURLNCDA	LMD		BURLINGTON	NC	636400	158800	Off-net	0	
										WNSLNCVI	UMD		WINSTON-VINEYARD	NC	645100	171900	Off-net	0	
	Raleigh	Raleigh	RLGHNCMODS1		Raleigh	NC	DMS	Northern Telecom		RLGHNCGL	JMD		RALEIGH	NC	633800	144300	On-Net	1	
										RLGHNCHO	RMD		RALEIGH	NC	633000	143500	On-Net	1	
										RLGHNCMO	DMD		RALEIGH	NC	634400	143300	On-Net	2	
										CARYNCCE	GMD		CARY RTP	NC	635600	145600	Off-net	0	
										CPHLNCRO	8MD		CHAPELHILL	NC	635900	151100	Off-net	0	
										DRHMNCXH	W01		DURHAM	NC	634700	147700	Off-net	0	
										DRHMNCXM	W16		DURHAM	NC	633000	149800	Off-net	0	
																		17	
	Chattanooga	Chattanooga	CHTGTNKVDS0		Chattanooga	TN	DMS	Northern Telecom		CHTGTNDT	AMD		DODDS	TN	709600	235700	On-Net	1	
										CHTGTNNS	WA3		NINETH STREET	TN	709700	236500	On-Net	1	
										CHTGTNBR	AMD		CHATTANOOGA-BRAINERD	TN	709100	234600	Off-net	0	

Knoxville	Knoxville	KNVLTNBHDS0	[redacted]	Knoxville	TN	DMS	Northern Telecom	[redacted]	KNVLTNMA	W9A	[redacted]	KNOXVILLE MAIN	TN	680100	225100	On-Net	2	[redacted]
									KNVLTNBE	BMD		KNOXVILLE-BEARDEN	TN	681100	225600	Off-net	0	
									KNVLTNWH	EMD		KNOXVILLE-WEST HILLS	TN	682000	226400	Off-net	0	
Nashville	Nashville	NSVLTN4B0S0		Nashville	TN	DMS	Northern Telecom		NSVLTNMT	XDX		Main and Tdf	TN	700900	271100	On-Net		
									NSVLTNMT	XQY		Main and Tol	TN	700900	271100	On-Net	1	
									NSVLTNST	EMD		SHARONDALE	TN	701000	271400	On-Net	1	
									NSVLTNUN	CMD		NASHVILLE-UNIVERSITY	TN	701400	271400	On-Net	1	
									NSVLTNBW	JMD		NASHVILLE-BRENTWOOD	TN	703700	270500	Off-net		
									NSVLTNCH	MMD		CHIEVE HALL	TN	702000	269500	Off-net		
																	7	

*OC-48 counts reported at building level. At least one OC-48 is installed in each of

ATTACHMENT
TO
INTERROGATORY NO. 6a

AT&T PROPRIETARY

Propriety Restricted

TN- LNS data as of Sept. 03

	PRIME PATH LINE
CHATTANOOGA	883
KNOXVILLE	814
NASHVILLE	2,306
Total Line Count	**4,003**

Counts above for LNS are by City, Switch location by Product & finally a total derived DS0 count.
If you want the Product counts by type of connectivity, e.g. DS0 or DS1 then use the data under each Product header otherwise you can use the derived DS0 counts, however please make sure we indicate that this total is derived.

The delta between the state level data (above) Vs the NPA NXX data below can be based on the LNS Switch in TN does provide some Prir the data above delinated enough to know the amounts to extract from TN to add into GA.

STATE	CITY	NPANXX	SERVICE PRODUCT
TN	ASHLAND CI	615792	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423242	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423244	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423265	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423266	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423267	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423296	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423485	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423490	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423499	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423508	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423510	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423622	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423624	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423629	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423698	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423752	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423755	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423756	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423763	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423821	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423822	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423825	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423855	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423867	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423870	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423874	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423875	Prime Path Lines(SW06-DS0)

TN	CHATTANOOG	423892	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423893	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423894	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423899	Prime Path Lines(SW06-DS0)
TN	CHATTANOOG	423954	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931551	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931552	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931572	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931645	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931647	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931648	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931905	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931906	Prime Path Lines(SW06-DS0)
TN	CLARKSVILL	931920	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423339	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423472	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423473	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423476	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423478	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423479	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423559	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423614	Prime Path Lines(SW06-DS0)
TN	CLEVELAND	423728	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615591	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615595	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615599	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615771	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615778	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615790	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615791	Prime Path Lines(SW06-DS0)
TN	FRANKLIN	615794	Prime Path Lines(SW06-DS0)
TN	GALLATIN	615230	Prime Path Lines(SW06-DS0)
TN	GALLATIN	615451	Prime Path Lines(SW06-DS0)
TN	GALLATIN	615452	Prime Path Lines(SW06-DS0)
TN	GOODLETTSV	615851	Prime Path Lines(SW06-DS0)
TN	GOODLETTSV	615855	Prime Path Lines(SW06-DS0)
TN	GOODLETTSV	615859	Prime Path Lines(SW06-DS0)
TN	HENDERSONV	615264	Prime Path Lines(SW06-DS0)
TN	HENDERSONV	615826	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865215	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865281	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865329	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865470	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865518	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865521	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865522	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865523	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865524	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865525	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865531	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865539	Prime Path Lines(SW06-DS0)

TN	KNOXVILLE	865540	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865544	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865546	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865558	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865573	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865577	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865579	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865583	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865584	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865588	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865633	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865637	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865670	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865673	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865687	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865688	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865689	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865690	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865691	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865692	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865693	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865694	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865766	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865769	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865824	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865909	Prime Path Lines(SW06-DS0)
TN	KNOXVILLE	865971	Prime Path Lines(SW06-DS0)
TN	LEBANON	615443	Prime Path Lines(SW06-DS0)
TN	LEBANON	615444	Prime Path Lines(SW06-DS0)
TN	LEBANON	615449	Prime Path Lines(SW06-DS0)
TN	LEBANON	615453	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865681	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865970	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865977	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865981	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865982	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865983	Prime Path Lines(SW06-DS0)
TN	MARYVILLE	865984	Prime Path Lines(SW06-DS0)
TN	MEMPHIS	901323	Prime Path Lines(SW06-DS0)
TN	MEMPHIS	901324	Prime Path Lines(SW06-DS0)
TN	MEMPHIS	901386	Prime Path Lines(SW06-DS0)
TN	MEMPHIS	901794	Prime Path Lines(SW06-DS0)
TN	MORRISTOWN	423581	Prime Path Lines(SW06-DS0)
TN	MORRISTOWN	423585	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615217	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615494	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615848	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615849	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615867	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615890	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615893	Prime Path Lines(SW06-DS0)

TN	MURFREESBO	615895	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615896	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615904	Prime Path Lines(SW06-DS0)
TN	MURFREESBO	615907	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615226	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615242	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615244	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615248	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615254	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615255	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615256	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615259	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615262	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615269	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615271	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615292	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615297	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615298	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615301	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615309	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615315	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615320	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615321	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615322	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615327	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615329	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615331	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615333	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615342	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615350	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615360	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615361	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615366	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615367	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615370	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615371	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615373	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615376	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615377	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615383	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615385	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615386	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615391	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615399	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615435	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615460	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615463	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615507	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615512	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615514	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615612	Prime Path Lines(SW06-DS0)

TN	NASHVILLE	615661	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615726	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615731	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615733	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615734	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615742	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615760	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615777	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615781	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615831	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615832	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615833	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615834	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615846	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615860	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615865	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615868	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615871	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615872	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615874	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615876	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615882	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615883	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615884	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615885	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615889	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615986	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615991	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	615995	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	931436	Prime Path Lines(SW06-DS0)
TN	NASHVILLE	931771	Prime Path Lines(SW06-DS0)
TN	OAK GROVE	931431	Prime Path Lines(SW06-DS0)
TN	OAK RIDGE	865220	Prime Path Lines(SW06-DS0)
TN	OAK RIDGE	865425	Prime Path Lines(SW06-DS0)
TN	OAK RIDGE	865481	Prime Path Lines(SW06-DS0)
TN	OAK RIDGE	865482	Prime Path Lines(SW06-DS0)
TN	OAK RIDGE	865483	Prime Path Lines(SW06-DS0)
TN	SEVIERVILL	865429	Prime Path Lines(SW06-DS0)
TN	SEVIERVILL	865908	Prime Path Lines(SW06-DS0)
TN	SMYRNA	615220	Prime Path Lines(SW06-DS0)
TN	SMYRNA	615223	Prime Path Lines(SW06-DS0)
TN	SMYRNA	615355	Prime Path Lines(SW06-DS0)
TN	SMYRNA	615459	Prime Path Lines(SW06-DS0)
TN		615750	Prime Path Lines(SW06-DS0)
			Totals:

ATTACHMENT
TO
INTERROGATORY NO. 6b

AT&T PROPRIETARY

Collocation Counts for TN

Switch CLLI	LSO8	UNE-L Lines	LATA	LATA NAME	SW STREET	SW CITY	SW STATE	SW ZIP
CHTGTNKVDS0								
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNBR		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421
	CHTGTNDT		472	CHATTANOOGA TN		CHATTANOOGA	TN	37404
	CHTGTNDT		472	CHATTANOOGA TN		CHATTANOOGA	TN	37404
	CHTGTNDT		472	CHATTANOOGA TN		CHATTANOOGA	TN	37404
	CHTGTNDT		472	CHATTANOOGA TN		CHATTANOOGA	TN	37404
	CHTGTNDT		472	CHATTANOOGA TN		CHATTANOOGA	TN	37404
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37403
	CHTGTNNS		472	CHATTANOOGA TN		CHATTANOOGA	TN	37421

Summary for 'Switch CLLI' = CHTGTNKVDS0 (24 detail records)

Sum 106

Switch CLLI	*LSO8*	*UNE-L Lines*	*LATA*	*LATA NAME*	*SW STREET*	*SW CITY*	*SW STATE*	*SW ZIP*
KNVLTNBHDS0								
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNBE TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	0
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNMA TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNWH TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNWH TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNWH TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNWH TENNESSEE		474		KNOXVILLE	KNOXVILLE	TN	37917
	KNVLTNWH		474		KNOXVILLE	KNOXVILLE	TN	37917

TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					
KNVLTNWH	474	KNOXVILLE	KNOXVILLE	TN	37917
TENNESSEE					

Switch CLLI	*LSO8*	*UNE-L Lines*	*LATA*	*LATA NAME*	*SW STREET*	*SW CITY*	*SW STATE*	*SW ZIP*
Summary for 'Switch CLLI' = KNVLTNBHDS0 (29 detail records)								
Sum		*200*						
NSVLTN48DS0								
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNBW TENNESSEE			470	NASHVILLE	BRENTWOOD	TN	37027
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNCH TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37211
	NSVLTNMT TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37201
	NSVLTNMT TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37201
	NSVLTNMT TENNESSEE			470	NASHVILLE	NASHVILLE	TN	37201

NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201
NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201
NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201
NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201
NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201
NSVLTNMT TENNESSEE	470	NASHVILLE	NASHVILLE	TN	37201

Switch CLLI	LSO8	UNE-L Lines	LATA	LATA NAME	SW STREET	SW CITY	SW STATE	SW ZIP
	NSVLTNMT TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37201
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNST TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37212
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203
	NSVLTNUN TENNESSEE		470		NASHVILLE	NASHVILLE	TN	37203

Summary for 'Switch CLLI' = NSVLTN48DS0 (46 detail records)

Sum 298

Grand Total 604

ATTACHMENT
TO
INTERROGATORY NO. 12

NPANXX	LSO8	Rate Center	City	State
423242	CHTGTNKV	CHATTNOOGA	CHATTANOOGA	TN
423265	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423266	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423267	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423272	RRVLTNMA	ROGERSVL	ROGERSVILLE	TN
423296	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423317	MRTWTNMA	MORRISTOWN	MORRISTOWN	TN
423326	CHTGTNHT	CHATTNOOGA	HARRISON	TN
423332	SDDSTNMA	SODDYDAISY	SODDY DAISY	TN
423337	SWTWTNMT	SWEETWATER	SWEETWATER	TN
423339	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423344	CHTGTNHT	CHATTNOOGA	HARRISON	TN
423451	SDDSTNMA	SODDYDAISY	SODDY DAISY	TN
423472	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423476	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423478	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423479	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423485	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423490	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423499	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423508	CHTGTNKV	CHATTNOOGA	CHATTANOOGA	TN
423510	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423517	CHTGTNSM	CHATTNOOGA	SIGNAL MOUNTAIN	TN
423553	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423559	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423570	DYTNTNMA	DAYTON	DAYTON	TN
423581	MRTWTNMA	MORRISTOWN	MORRISTOWN	TN
423586	MRTWTNMA	MORRISTOWN	MORRISTOWN	TN
423587	MRTWTNMA	MORRISTOWN	MORRISTOWN	TN
423614	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423622	CHTGTNDT	CHATTNOOGA	CHATTANOOGA	TN
423623	NWPTTNMT	NEWPORT	NEWPORT	TN
423624	CHTGTNDT	CHATTNOOGA	CHATTANOOGA	TN
423625	NWPTTNMT	NEWPORT	NEWPORT	TN
423629	CHTGTNDT	CHATTNOOGA	CHATTANOOGA	TN
423634	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423697	CHTGTNDT	CHATTNOOGA	CHATTANOOGA	TN
423698	CHTGTNDT	CHATTNOOGA	CHATTANOOGA	TN
423728	CLEVTNMA	CLEVELAND	CLEVELAND	TN
423752	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423756	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423757	CHTGTNNS	CHATTNOOGA	CHATTANOOGA	TN
423775	DYTNTNMA	DAYTON	DAYTON	TN
423821	CHTGTNSE	CHATTNOOGA	CHATTANOOGA	TN
423822	CHTGTNSE	CHATTNOOGA	CHATTANOOGA	TN
423825	CHTGTNSE	CHATTNOOGA	CHATTANOOGA	TN
423837	SPBGTNMA	SO PITTSBG	SOUTH PITTSBURG	TN
423842	CHTGTNMV	CHATTNOOGA	HIXSON	TN
423843	CHTGTNMV	CHATTNOOGA	HIXSON	TN
423855	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN

423867	CHTGTNRO	CHATTNOOGA	ROSSVILLE	TN
423870	CHTGTNRB	CHATTNOOGA	CHATTANOOGA	TN
423874	CHTGTNRB	CHATTNOOGA	CHATTANOOGA	TN
423875	CHTGTNRB	CHATTNOOGA	CHATTANOOGA	TN
423876	CHTGTNRB	CHATTNOOGA	CHATTANOOGA	TN
423877	CHTGTNRB	CHATTNOOGA	CHATTANOOGA	TN
423886	CHTGTNSM	CHATTNOOGA	SIGNAL MOUNTAIN	TN
423892	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423893	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423894	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423899	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
423954	CHTGTNBR	CHATTNOOGA	CHATTANOOGA	TN
615206	GALLTNMA	GALLATIN	GALLATIN	TN
615217	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615220	SMYRTNMA	SMYRNA	SMYRNA	TN
615221	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615226	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615227	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615228	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615230	GALLTNMA	GALLATIN	GALLATIN	TN
615242	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615244	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615248	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615251	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615254	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615255	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615256	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615258	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615259	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615262	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615264	HDVLTNMA	HENDERSNVL	HENDERSONVILLE	TN
615266	NSVMTNFS	FAIRVIEW	NASHVILLE	TN
615269	NSVLTNST	NASHVILLE	NASHVILLE	TN
615275	NSVLTNAA	NASHVILLE	NASHVILLE	TN
615279	NSVLTNST	NASHVILLE	NASHVILLE	TN
615292	NSVLTNST	NASHVILLE	NASHVILLE	TN
615297	NSVLTNST	NASHVILLE	NASHVILLE	TN
615298	NSVLTNST	NASHVILLE	NASHVILLE	TN
615299	NSVLTNWC	NASHVILLE	WHITES CREEK	TN
615309	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615313	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615315	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615320	NSVLTNUN	NASHVILLE	NASHVILLE	TN
615321	NSVLTNUN	NASHVILLE	NASHVILLE	TN
615322	NSVLTNUN	NASHVILLE	NASHVILLE	TN
615325	PTLDTNMA	PORTLAND	PORTLAND	TN
615327	NSVLTNUN	NASHVILLE	NASHVILLE	TN
615329	NSVLTNUN	NASHVILLE	NASHVILLE	TN
615331	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615333	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615342	NSVLTNUN	NASHVILLE	NASHVILLE	TN

615350	NSVLTNCD	NASHVILLE	NASHVILLE	TN
615352	NSVLTNWM	NASHVILLE	NASHVILLE	TN
615353	NSVLTNWM	NASHVILLE	NASHVILLE	TN
615354	NSVLTNWM	NASHVILLE	NASHVILLE	TN
615355	SMYRTNMA	SMYRNA	SMYRNA	TN
615356	NSVLTNWM	NASHVILLE	NASHVILLE	TN
615360	NSVLTNAP	NASHVILLE	NASHVILLE	TN
615361	NSVLTNAP	NASHVILLE	NASHVILLE	TN
615365	NSVLTNAP	NASHVILLE	NASHVILLE	TN
615366	NSVLTNAP	NASHVILLE	NASHVILLE	TN
615370	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615371	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615373	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615376	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615377	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615382	SPFDTNMA	SPRINGFLD	SPRINGFIELD	TN
615383	NSVLTNST	NASHVILLE	NASHVILLE	TN
615384	SPFDTNMA	SPRINGFLD	SPRINGFIELD	TN
615385	NSVLTNST	NASHVILLE	NASHVILLE	TN
615386	NSVLTNST	NASHVILLE	NASHVILLE	TN
615391	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615399	NSVLTNAP	NASHVILLE	NASHVILLE	TN
615441	DKSNTNMT	DICKSON	DICKSON	TN
615444	LBNNTNMA	LEBANON	LEBANON	TN
615445	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615446	DKSNTNMT	DICKSON	DICKSON	TN
615449	LBNNTNMA	LEBANON	LEBANON	TN
615451	GALLTNMA	GALLATIN	GALLATIN	TN
615452	GALLTNMA	GALLATIN	GALLATIN	TN
615453	LBNNTNMA	LEBANON	LEBANON	TN
615457	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615459	SMYRTNMA	SMYRNA	SMYRNA	TN
615460	NSVLTNST	NASHVILLE	NASHVILLE	TN
615463	NSVLTNST	NASHVILLE	NASHVILLE	TN
615472	FKLNTNMA	FRANKLIN	FRANKLIN	TN
615476	NSVLTN32	NASHVILLE	NASHVILLE	TN
615478	NSVLTN32	NASHVILLE	NASHVILLE	TN
615479	NSVMTNDB	NASHVILLE	NASHVILLE	TN
615522	NSVLTN90	NASHVILLE	NASHVILLE	TN
615531	NSVLTNFP	NASHVILLE	NASHVILLE	TN
615539	NSVLTNFP	NASHVILLE	NASHVILLE	TN
615541	OLHCTNMA	OLDHICKORY	OLD HICKORY	TN
615584	NSVMTNVG	NASHVILLE	NASHVILLE	TN
615595	FKLNTNMA	FRANKLIN	FRANKLIN	TN
615599	FKLNTNMA	FRANKLIN	FRANKLIN	TN
615612	NSVLTNMC	NASHVILLE	NASHVILLE	TN
615643	GNBRTNMA	GREENBRIER	GREENBRIER	TN
615646	NSVLTNBV	NASHVILLE	NASHVILLE	TN
615650	NSVLTNIN	NASHVILLE	NASHVILLE	TN
615661	NSVLTNBW	NASHVILLE	BRENTWOOD	TN
615662	NSVLTNBV	NASHVILLE	NASHVILLE	TN

615665	NSVLTNBH	NASHVILLE	NASHVILLE	TN
615672	WHHSTNMA	WHITEHOUSE	WHITE HOUSE	TN
615673	NSVLTNBV	NASHVILLE	NASHVILLE	TN
615690	NSVLTN02	NASHVILLE	NASHVILLE	TN
615726	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615731	NSVLTNHH	NASHVILLE	ANTIOCH	TN
615750	NSVLTN48	NASHVILLE	NASHVILLE	TN
615756	GDVLTNMA	GOODLETSVL	GOODLETTSVILLE	TN
615781	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615782	NSVLTNMT	NASHVILLE	NASHVILLE	TN
615783	NSVLTNST	NASHVILLE	NASHVILLE	TN
615791	FKLNTNMA	FRANKLIN	FRANKLIN	TN
615792	ASCYTNMA	ASHLAND CY	ASHLAND CITY	TN
615794	FKLNTNMA	FRANKLIN	FRANKLIN	TN
615822	HDVLTNMA	HENDERSNVL	HENDERSONVILLE	TN
615824	HDVLTNMA	HENDERSNVL	HENDERSONVILLE	TN
615826	HDVLTNMA	HENDERSNVL	HENDERSONVILLE	TN
615831	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615832	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615833	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615834	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615837	NSVLTNCH	NASHVILLE	NASHVILLE	TN
615847	OLHCTNMA	OLDHICKORY	OLD HICKORY	TN
615848	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615851	GDVLTNMA	GOODLETSVL	GOODLETTSVILLE	TN
615855	GDVLTNMA	GOODLETSVL	GOODLETTSVILLE	TN
615859	GDVLTNMA	GOODLETSVL	GOODLETTSVILLE	TN
615860	NSVLTNMC	NASHVILLE	NASHVILLE	TN
615865	NSVLTNMC	NASHVILLE	NASHVILLE	TN
615867	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615868	NSVLTNMC	NASHVILLE	NASHVILLE	TN
615870	NSVLTNMC	NASHVILLE	NASHVILLE	TN
615871	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615872	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615874	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615876	NSVLTNWC	NASHVILLE	WHITES CREEK	TN
615882	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615883	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615885	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615886	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615889	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615890	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615893	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615895	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615896	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615898	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615902	NSVLTNDO	NASHVILLE	NASHVILLE	TN
615904	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615907	MRBOTNMA	MURFREESBO	MURFREESBORO	TN
615986	NSVLTN48	NASHVILLE	NASHVILLE	TN
731764	GDJTTNMA	GRAND JCT	GRAND JUNCTION	TN

731784	HMBLTNMA	HUMBOLDT	HUMBOLDT	TN
865212	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865219	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865220	OKRGTNMT	OAK RIDGE	OAK RIDGE	TN
865281	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865330	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865397	DNRGTNMA	DANDRIDGE	DANDRIDGE	TN
865408	LODNTNMA	LOUDON	LOUDON	TN
865425	OKRGTNMT	OAK RIDGE	OAK RIDGE	TN
865426	LKCYTNMA	LAKE CITY	LAKE CITY	TN
865428	SVVLTNMT	SEVIERVL	SEVIERVILLE	TN
865429	SVVLTNMT	SEVIERVL	SEVIERVILLE	TN
865430	GTBGTNMT	GATLINBURG	GATLINBURG	TN
865435	OLSPTNMA	OLIVER SPG	OLIVER SPRINGS	TN
865436	GTBGTNMT	GATLINBURG	GATLINBURG	TN
865448	TWNSTNMA	MARYVILLE	TOWNSEND	TN
865453	SVVLTNMT	SEVIERVL	SEVIERVILLE	TN
865457	CLTNTNMA	CLINTON	CLINTON	TN
865458	LODNTNMA	LOUDON	LOUDON	TN
865470	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865482	OKRGTNMT	OAK RIDGE	OAK RIDGE	TN
865483	OKRGTNMT	OAK RIDGE	OAK RIDGE	TN
865521	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865522	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865523	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865524	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865525	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865531	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865539	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865540	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865544	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865546	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865558	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865560	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865573	KNVLTNYH	KNOXVILLE	KNOXVILLE	TN
865577	KNVLTNYH	KNOXVILLE	KNOXVILLE	TN
865579	KNVLTNYH	KNOXVILLE	KNOXVILLE	TN
865584	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865588	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865590	HIMNTNMA	HARRIMAN	HARRIMAN	TN
865633	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865637	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865670	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865673	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865674	WHPITNMA	WHITE PINE	WHITE PINE	TN
865681	MAVLTNMA	MARYVILLE	ALCOA	TN
865686	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865687	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865688	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865689	KNVLTNFC	KNOXVILLE	KNOXVILLE	TN
865690	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN

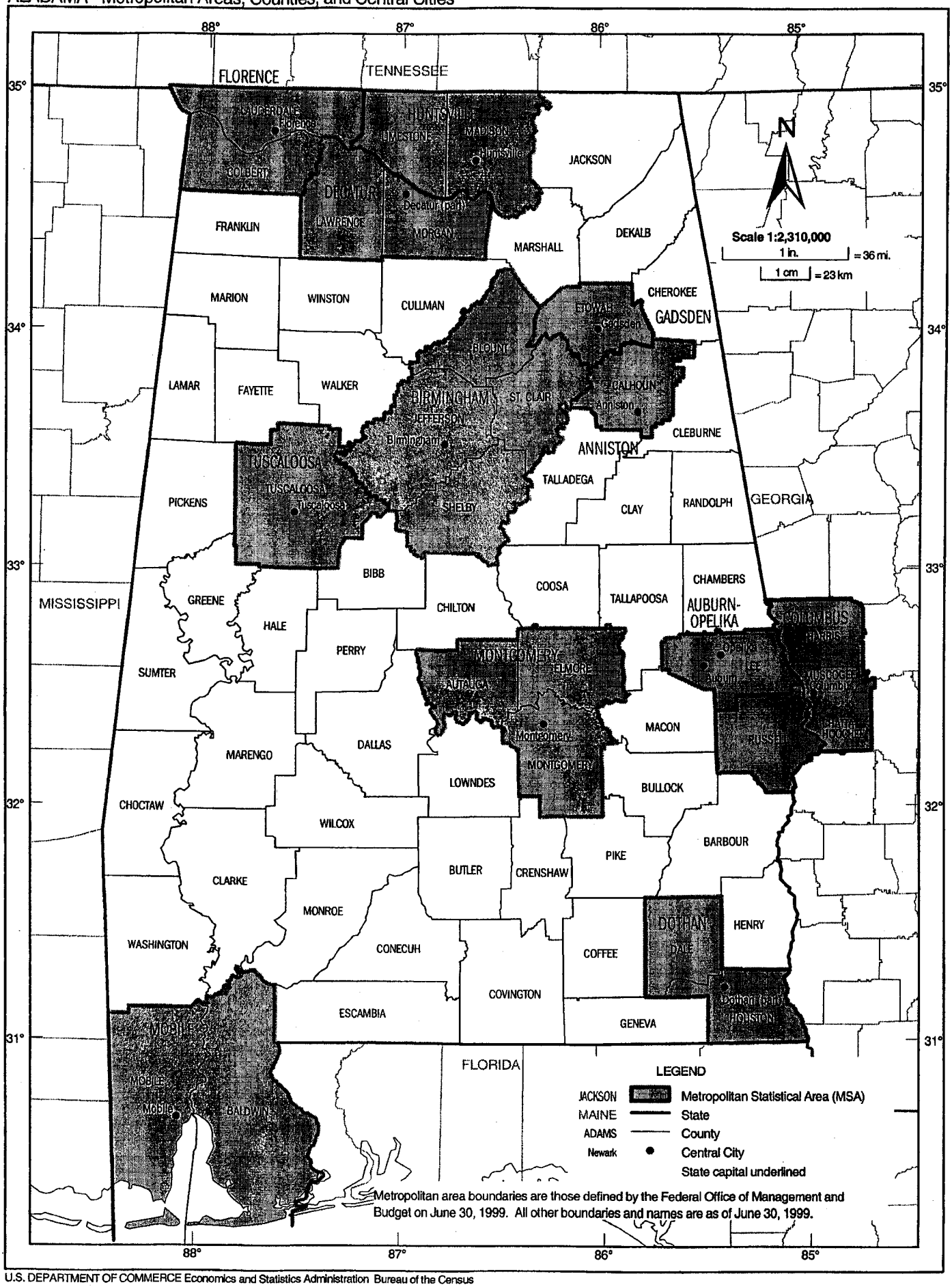
865691	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865692	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865693	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865694	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865769	KNVLTNWH	KNOXVILLE	KNOXVILLE	TN
865774	SVVLTNMT	SEVIERVL	SEVIERVILLE	TN
865824	KNVLTNBH	KNOXVILLE	KNOXVILLE	TN
865882	HIMNTNMA	HARRIMAN	HARRIMAN	TN
865908	SVVLTNMT	SEVIERVL	SEVIERVILLE	TN
865909	KNVLTNBE	KNOXVILLE	KNOXVILLE	TN
865932	MSCTTNMT	MASCOT	MASCOT	TN
865933	MSCTTNMT	MASCOT	MASCOT	TN
865971	KNVLTNMA	KNOXVILLE	KNOXVILLE	TN
865977	MAVLTNMA	MARYVILLE	ALCOA	TN
865980	MAVLTNMA	MARYVILLE	ALCOA	TN
865981	MAVLTNMA	MARYVILLE	ALCOA	TN
865982	MAVLTNMA	MARYVILLE	ALCOA	TN
865983	MAVLTNMA	MARYVILLE	ALCOA	TN
865984	MAVLTNMA	MARYVILLE	ALCOA	TN
865986	LNCYTNMA	LENOIRCITY	LENOIR CITY	TN
865988	LNCYTNMA	LENOIRCITY	LENOIR CITY	TN
901272	MMPHTNMT	MEMPHIS	MEMPHIS	TN
901274	MMPHTNMT	MEMPHIS	MEMPHIS	TN
901309	MMPHTNGT	MEMPHIS	GERMANTOWN	TN
901323	MMPHTNCT	MEMPHIS	MEMPHIS	TN
901327	MMPHTNCT	MEMPHIS	MEMPHIS	TN
901345	MMPHTNSL	MEMPHIS	MEMPHIS	TN
901353	MMPHTNFR	MEMPHIS	MEMPHIS	TN
901358	MMPHTNFR	MEMPHIS	MEMPHIS	TN
901362	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901363	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901368	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901372	MMPHTNBA	MEMPHIS	MEMPHIS	TN
901398	MMPHTNSL	MEMPHIS	MEMPHIS	TN
901458	MMPHTNCT	MEMPHIS	MEMPHIS	TN
901525	MMPHTNMA	MEMPHIS	MEMPHIS	TN
901542	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901683	MMPHTNEL	MEMPHIS	MEMPHIS	TN
901685	MMPHTNEL	MEMPHIS	MEMPHIS	TN
901743	MMPHTNCK	MEMPHIS	MEMPHIS	TN
901744	MMPHTNCK	MEMPHIS	MEMPHIS	TN
901751	MMPHTNGT	MEMPHIS	GERMANTOWN	TN
901756	MMPHTNGT	MEMPHIS	GERMANTOWN	TN
901763	MMPHTNEL	MEMPHIS	MEMPHIS	TN
901767	MMPHTNEL	MEMPHIS	MEMPHIS	TN
901774	MMPHTNST	MEMPHIS	MEMPHIS	TN
901794	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901795	MMPHTNOA	MEMPHIS	MEMPHIS	TN
901854	CRVLTNMA	COLLIERVL	COLLIERVILLE	TN
901948	MMPHTNST	MEMPHIS	MEMPHIS	TN
931503	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN

931551	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931552	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931553	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931624	NSVLTN29	CLARKSVL	NASHVILLE	TN	
931629	NSVLTN29	LAWRENCEBG	NASHVILLE	TN	
931645	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931647	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931648	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931905	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931906	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931920	CLVLTNMA	CLARKSVL	CLARKSVILLE	TN	
931967	WNCHTNMA	WINCHESTER	WINCHESTER	TN	

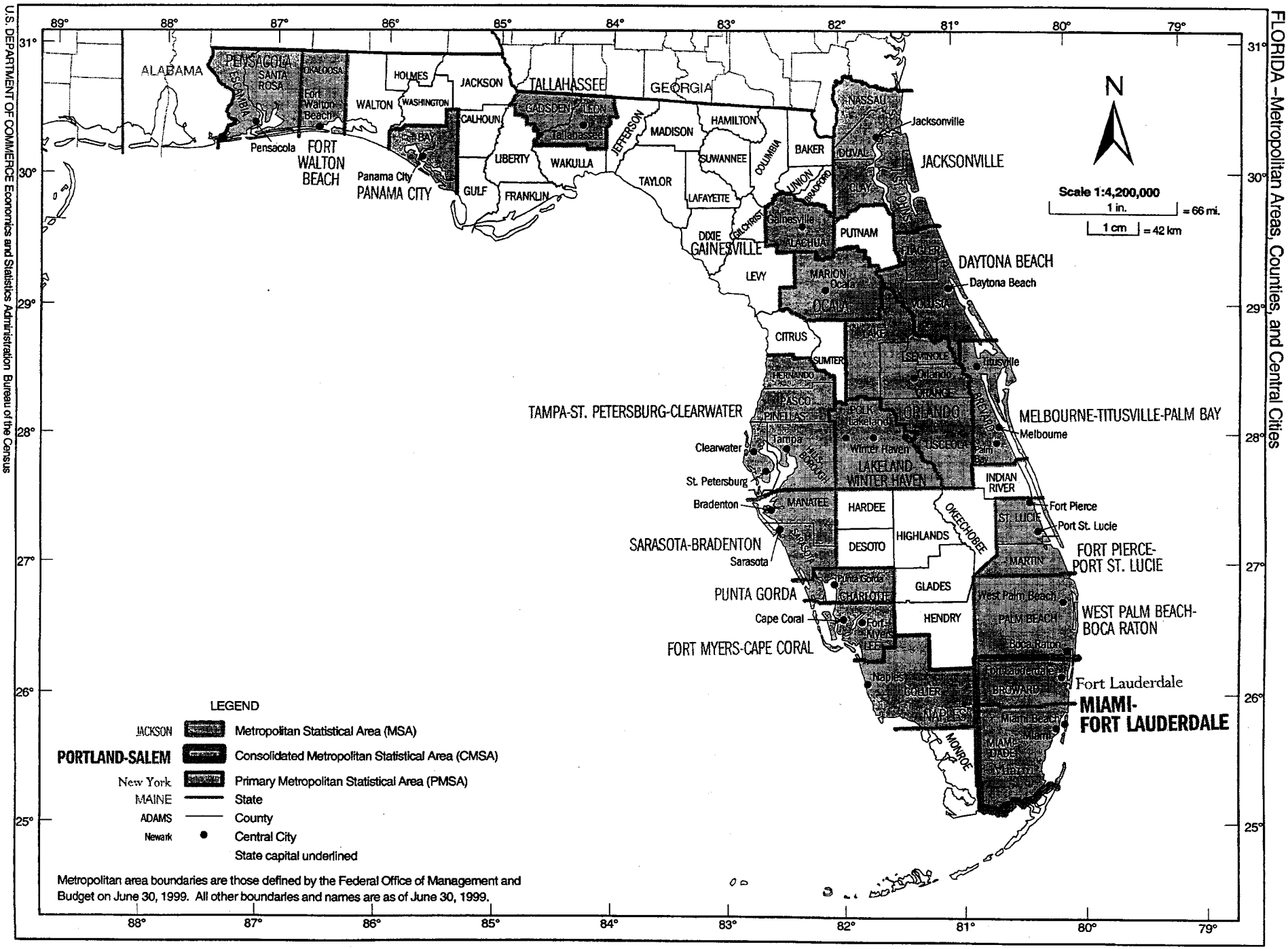
TOTALS
Fallout from Pam Brander's Collocation Report
GRAND TOTAL (UNE-P Lines)

ATTACHMENT
TO
INTERROGATORY NO. 20

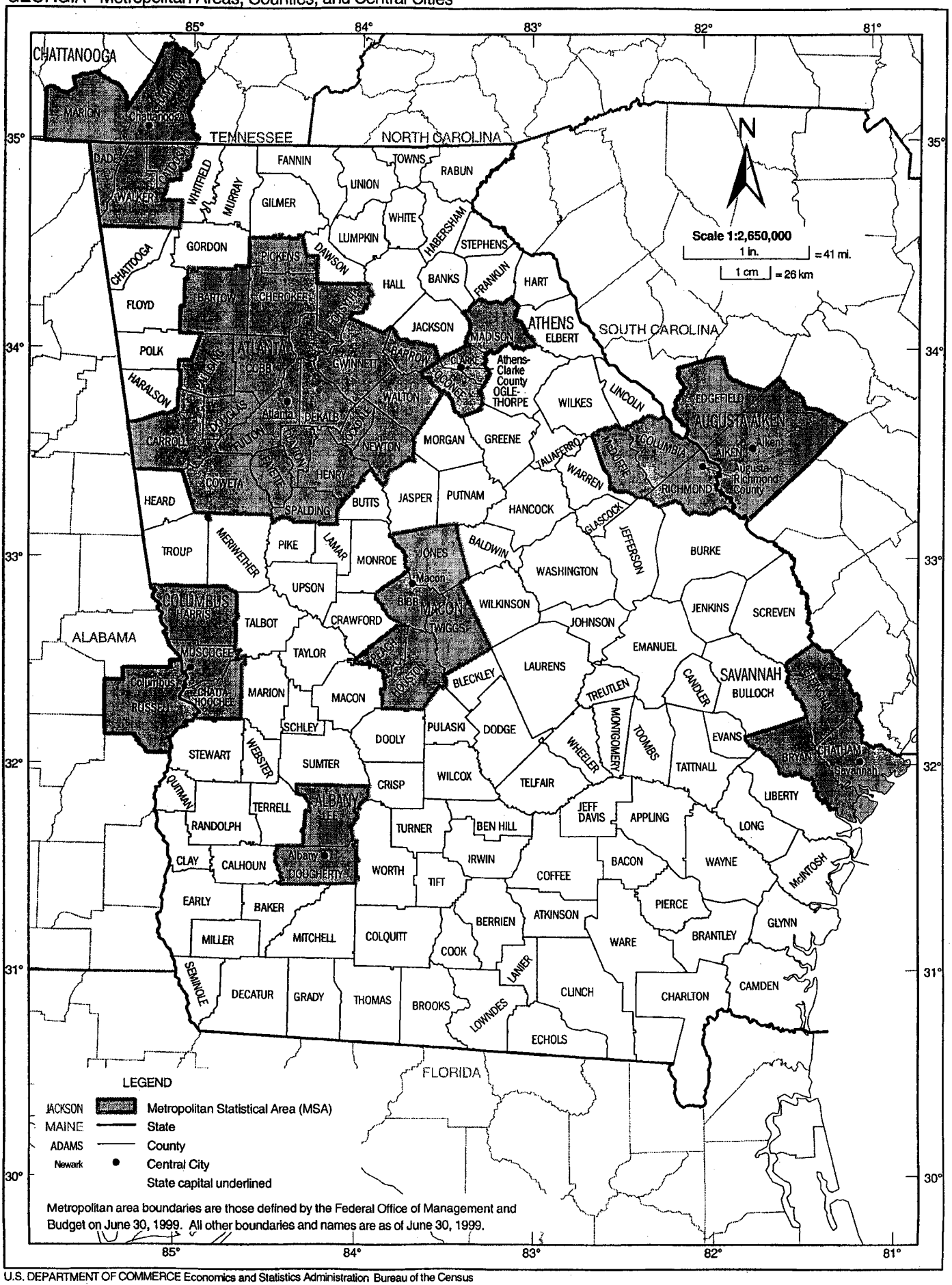
ALABAMA –Metropolitan Areas, Counties, and Central Cities



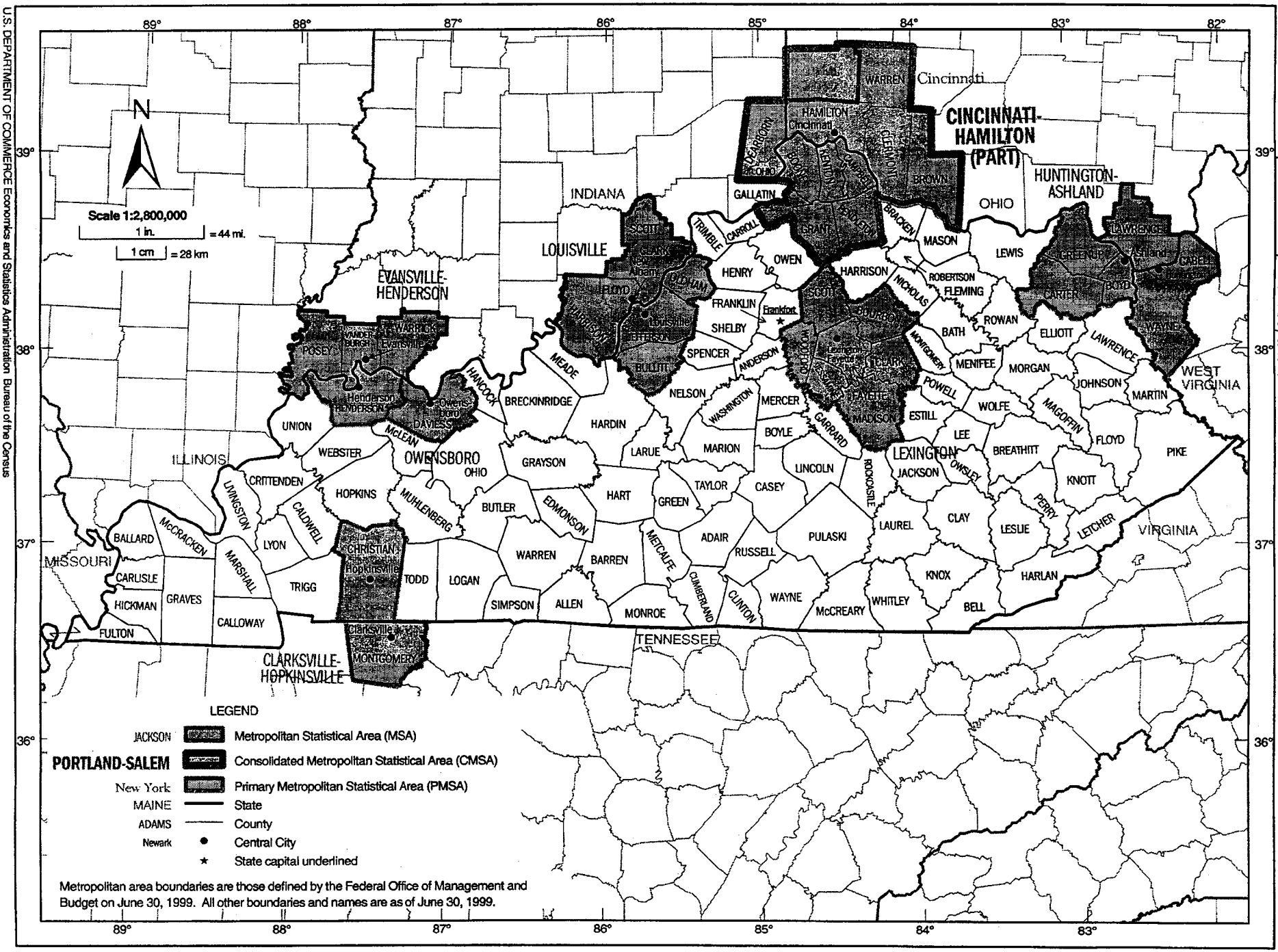
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census


FLORIDA – Metropolitan Areas, Counties, and Central Cities
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census
N
Scale 1:4,200,000
1 in. = 66 mi.
1 cm = 42 km
ALABAMA
GEORGIA
PENSACOLA
SANTA ROSA
ESCAMBIA
OKALOOSA
Fort Walton Beach
Pensacola
FORT WALTON BEACH
WALTON
HOLMES
WASHINGTON
JACKSON
BAY
Panama City
PANAMA CITY
CALHOUN
GULF
FRANKLIN
TALLAHASSEE
GADSDEN
LEON
Tallahassee
LIBERTY
WAKULLA
JEFFERSON
MADISON
TAYLOR
HAMILTON
SUWANNEE
LAFAYETTE
COLUMBIA
BAKER
NASSAU
Jacksonville
DUVAL
JACKSONVILLE
CLAY
UNION
BRADFORD
ST. JOHNS
PUTNAM
FLAGLER
DAYTONA BEACH
Daytona Beach
Gainesville
ALACHUA
DIXIE
GILCHRIST
GAINESVILLE
LEVY
MARION
Ocala
OCALA
VOLUSIA
CITRUS
LAKE
SUMTER
SEMINOLE
Titusville
HERNANDO
PASCO
PINELLAS
Orlando
ORANGE
OSCEOLA
BREVARD
POLK
Lakeland
ORLANDO
TAMPA-ST. PETERSBURG-CLEARWATER
MELBOURNE-TITUSVILLE-PALM BAY
Melbourne
Clearwater
Tampa
Winter Haven
HILLSBOROUGH
LAKELAND-WINTER HAVEN
INDIAN RIVER
St. Petersburg
Bradenton
MANATEE
HARDEE
OKEECHOBEE
Fort Pierce
ST. LUCIE
Port St. Lucie
SARASOTA-BRADENTON
Sarasota
DESOTO
HIGHLANDS
FORT PIERCE-PORT ST. LUCIE
MARTIN
Punta Gorda
CHARLOTTE
GLADES
West Palm Beach
PUNTA GORDA
Cape Coral
Fort Myers
LEE
HENDRY
PALM BEACH
WEST PALM BEACH-BOCA RATON
Boca Raton
FORT MYERS-CAPE CORAL
Naples
COLLIER
Fort Lauderdale
BROWARD
MIAMI-FORT LAUDERDALE
Miami Beach
Miami
MIAMI-DADE
MONROE
LEGEND
JACKSON Metropolitan Statistical Area (MSA)
PORTLAND-SALEM Consolidated Metropolitan Statistical Area (CMSA)
New York Primary Metropolitan Statistical Area (PMSA)
MAINE State
ADAMS County
Newark Central City
State capital underlined
Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.

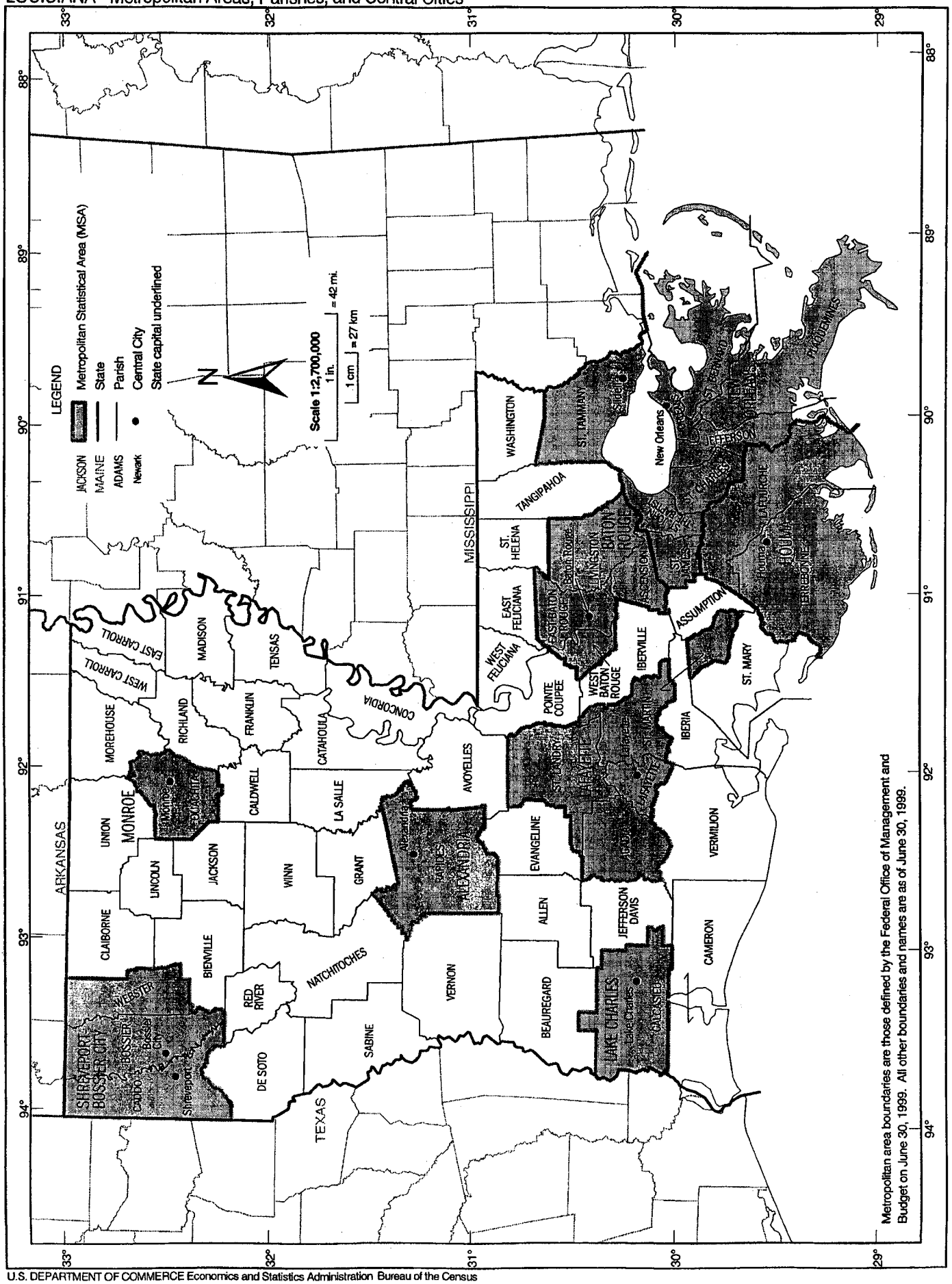
GEORGIA –Metropolitan Areas, Counties, and Central Cities



U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census


KENTUCKY –Metropolitan Areas, Counties, and Central Cities
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census
89°
88°
87°
86°
85°
84°
83°
82°
39°
38°
37°
36°
N
Scale 1:2,800,000
1 in. = 44 mi.
1 cm = 28 km
CINCINNATI-HAMILTON (PART)
Cincinnati
HUNTINGTON-ASHLAND
LOUISVILLE
EVANSVILLE-HENDERSON
OWENSBORO
LEXINGTON
CLARKSVILLE-HOPKINSVILLE
INDIANA
OHIO
ILLINOIS
MISSOURI
TENNESSEE
WEST VIRGINIA
VIRGINIA
WARREN
HAMILTON
CLERMONT
BROWN
CLINTON
GALLATIN
BOONE
KENTON
CAMPBELL
GRANT
PENDLETON
BRACKEN
MASON
LEWIS
ROBERTSON
FLEMING
LAWRENCE
GREENUP
CARTER
BOYD
CABELL
WAYNE
TRIMBLE
CARROLL
OWEN
HENRY
SHELBY
FRANKLIN
Frankfort
SCOTT
HARRISON
NICHOLAS
BOURBON
BATH
ROWAN
ELLIOTT
SCOTT
CLARK
MADISON
FAYETTE
Lexington-Fayette
JESSAMINE
WOODFORD
MONTGOMERY
MENIFEE
MORGAN
JOHNSON
MARTIN
POWELL
ESTILL
WOLFE
MAGOFFIN
FLOYD
PIKE
LEE
BREATHITT
OWSLEY
KNOTT
JACKSON
PERRY
LESLIE
LETCHER
CLAY
LAUREL
KNOX
HARLAN
BELL
WHITLEY
McCREARY
PULASKI
ROCKCASTLE
GARRARD
BOYLE
MERCER
WASHINGTON
NELSON
ANDERSON
SPENCER
BULLITT
JEFFERSON
OLDHAM
HENRY
FLOYD
HARRISON
CLARK
SCOTT
Louisville
Jeffersonville
Clarksville
Adam
MEADE
HANCOCK
BRECKINRIDGE
HARDIN
LARUE
MARION
TAYLOR
CASEY
LINCOLN
GREEN
ADAIR
RUSSELL
CUMBERLAND
CLINTON
WAYNE
MONROE
BARREN
METCALFE
ALLEN
SIMPSON
WARREN
LOGAN
TODD
TRIGG
CHRISTIAN
Hopkinsville
MONTGOMERY
Clarksville
HOPKINS
MUHLENBERG
BUTLER
GRAYSON
EDMONSON
HART
CALDWELL
LYON
CRITTENDEN
LIVINGSTON
MARSHALL
McCRACKEN
BALLARD
CARLISLE
HICKMAN
FULTON
GRAVES
CALLOWAY
UNION
WEBSTER
McLEAN
DAVIESS
Owensboro
HENDERSON
Henderson
POSEY
WARRICK
Evansville
VANDERBURGH
LEGEND
JACKSON Metropolitan Statistical Area (MSA)
PORTLAND-SALEM Consolidated Metropolitan Statistical Area (CMSA)
New York Primary Metropolitan Statistical Area (PMSA)
MAINE State
ADAMS County
Newark Central City
★ State capital underlined
Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.

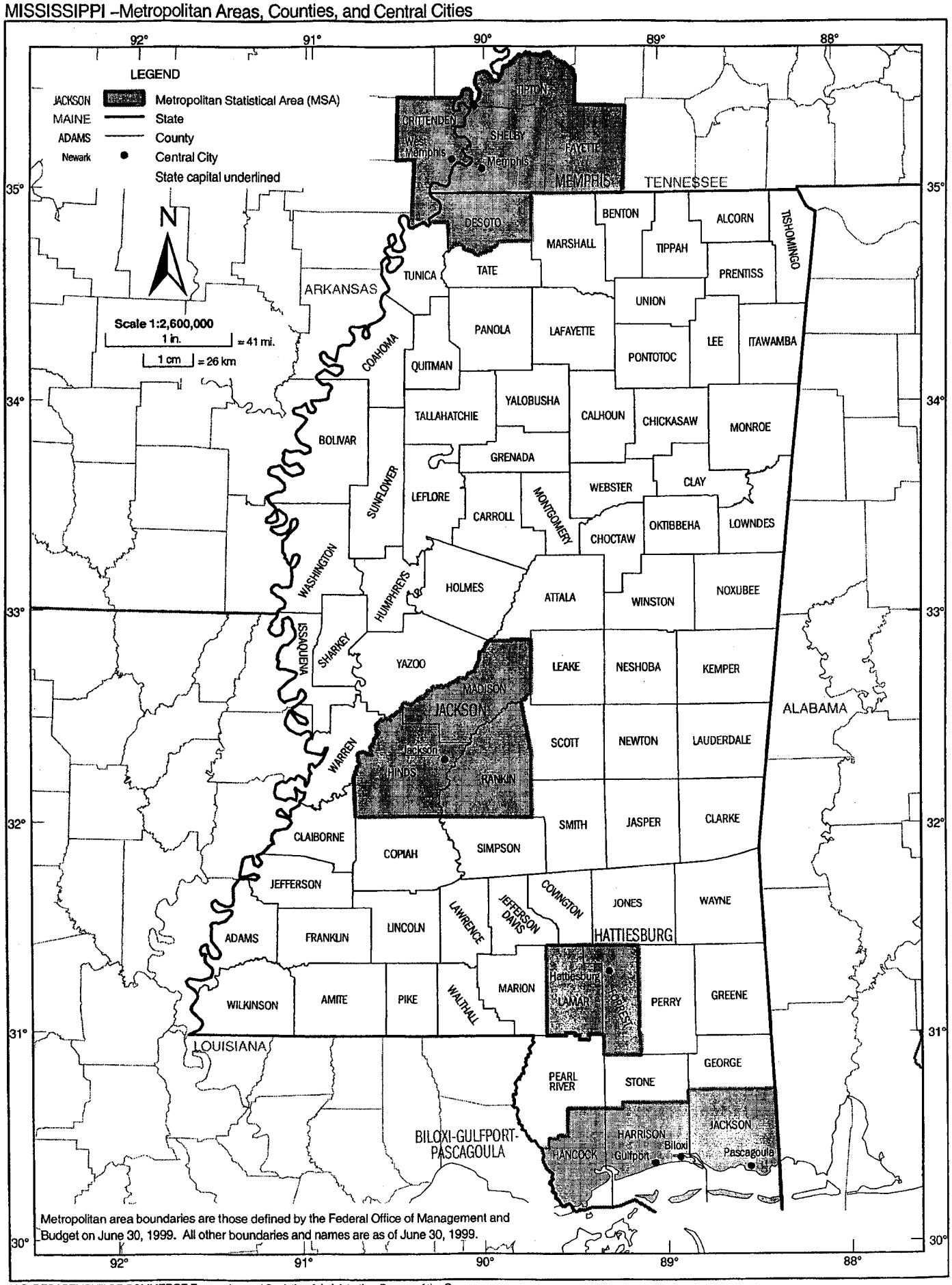
LOUISIANA –Metropolitan Areas, Parishes, and Central Cities



Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.

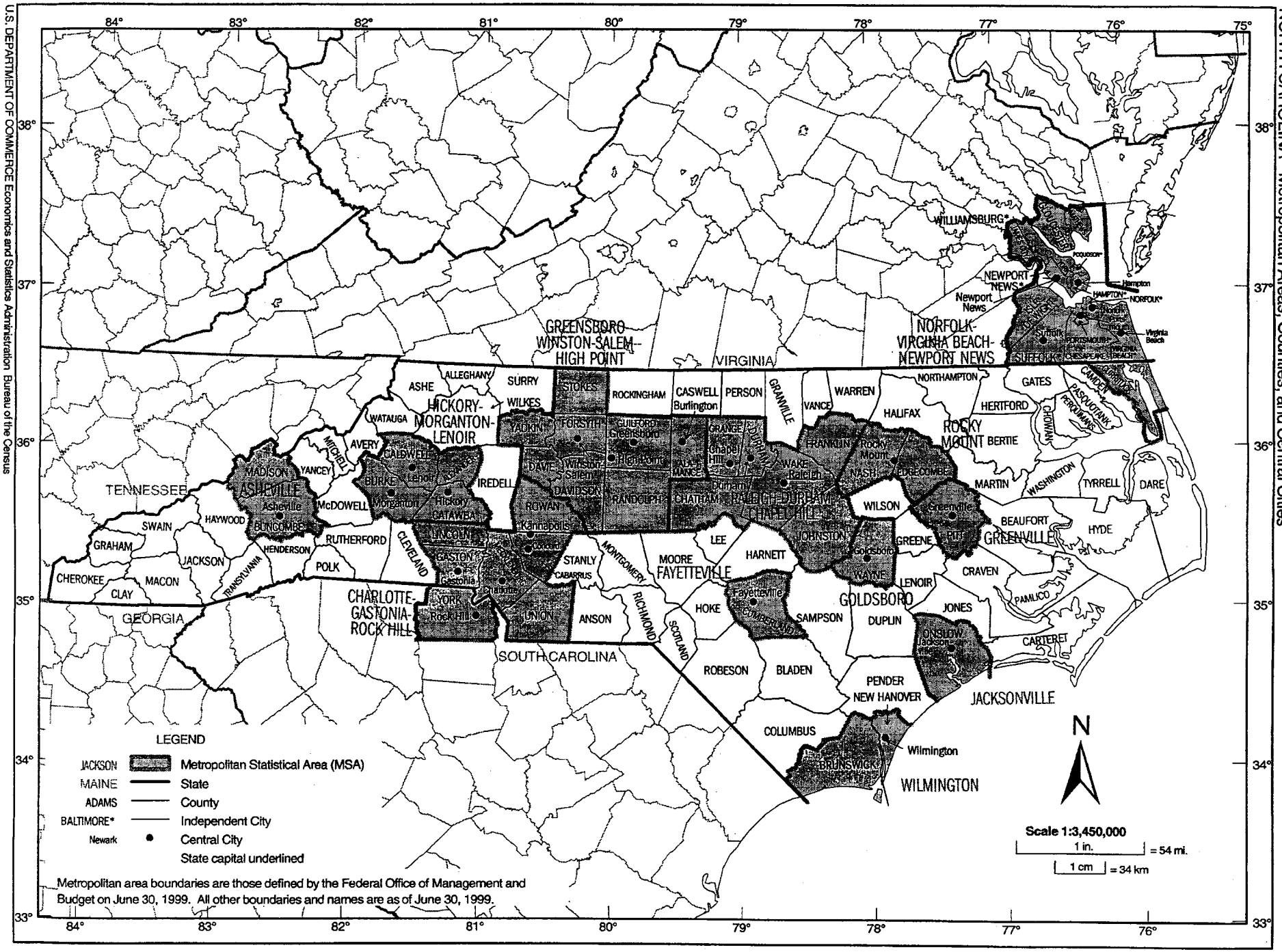
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

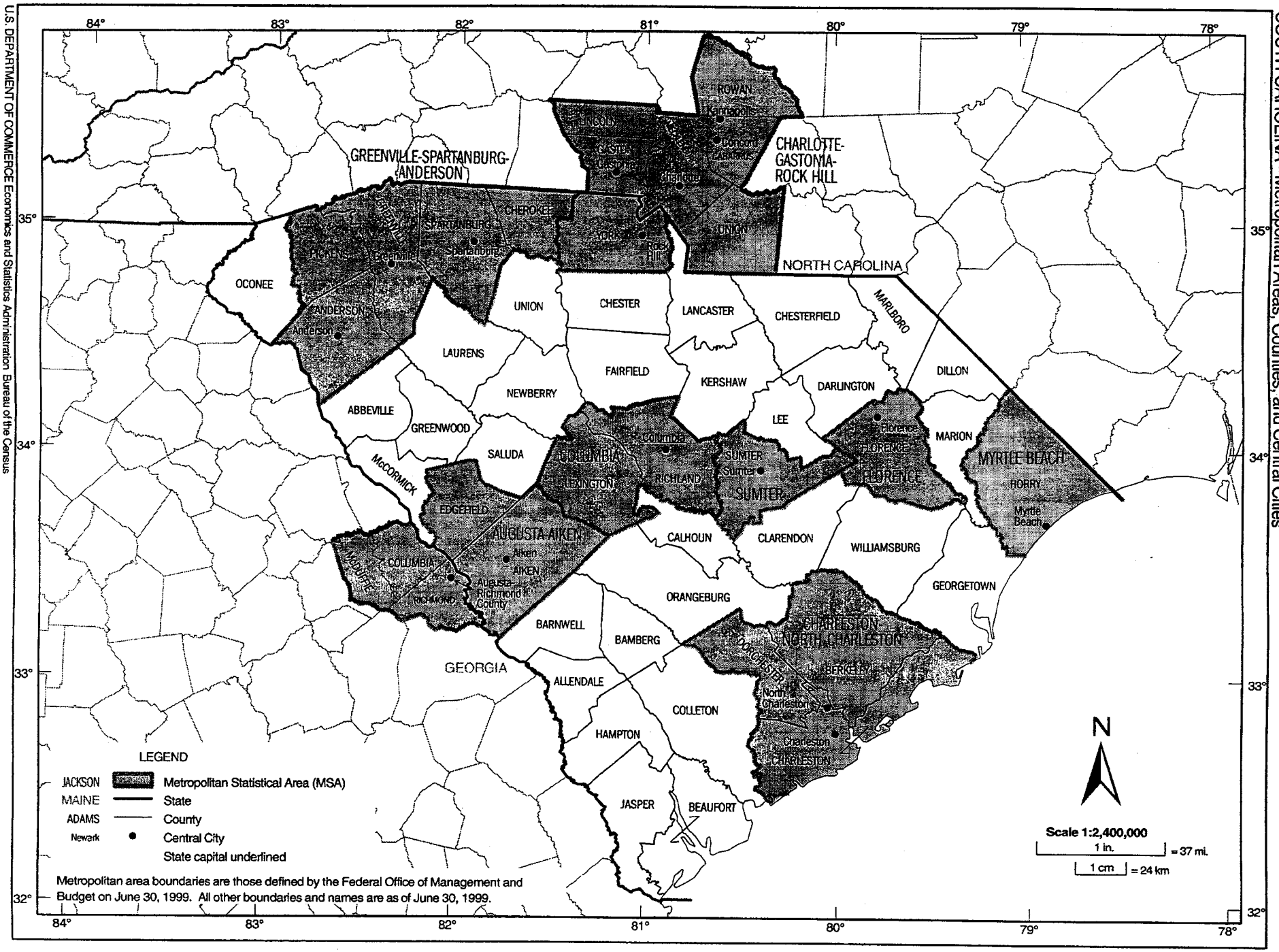
MISSISSIPPI –Metropolitan Areas, Counties, and Central Cities

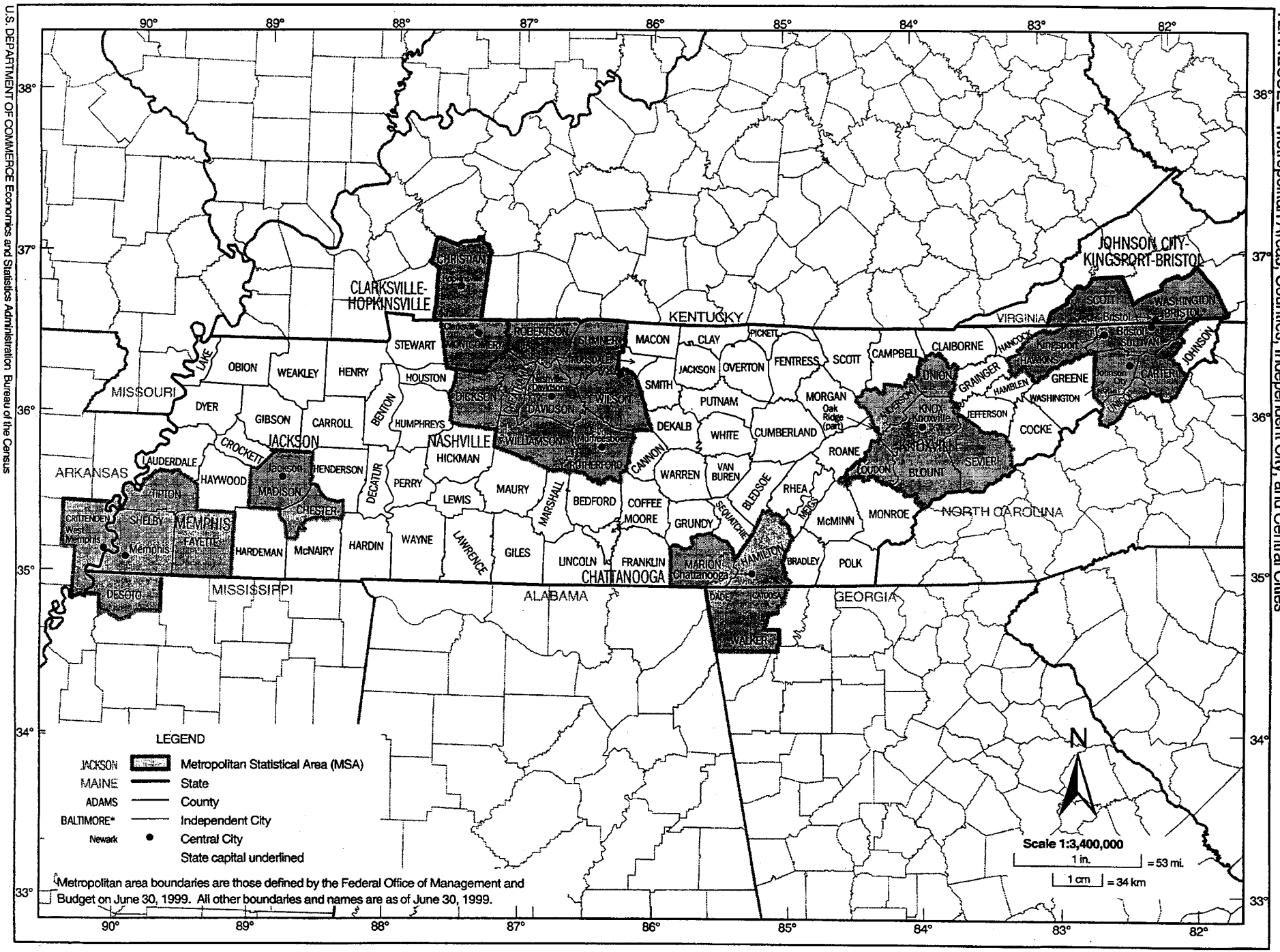


Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.

U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census


NORTH CAROLINA –Metropolitan Areas, Counties, and Central Cities
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census
GREENSBORO-WINSTON-SALEM-HIGH POINT
HICKORY-MORGANTON-LENOIR
ASHEVILLE
CHARLOTTE-GASTONIA-ROCK HILL
GREENVILLE
SPARTANBURG
FAYETTEVILLE
GOLDSBORO
RALEIGH-DURHAM-CHAPEL HILL
ROCKY MOUNT
NORFOLK-VIRGINIA BEACH-NEWPORT NEWS
JACKSONVILLE
WILMINGTON
VIRGINIA
TENNESSEE
GEORGIA
SOUTH CAROLINA
LEGEND
Metropolitan Statistical Area (MSA)
State
County
Independent City
Central City
State capital underlined
Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.
N
Scale 1:3,450,000
1 in. = 54 mi.
1 cm = 34 km


SOUTH CAROLINA –Metropolitan Areas, Counties, and Central Cities
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census
84°
83°
82°
81°
80°
79°
78°
35°
34°
33°
32°
GREENVILLE-SPARTANBURG-ANDERSON
CHARLOTTE-GASTONIA-ROCK HILL
NORTH CAROLINA
GEORGIA
AUGUSTA-AIKEN
COLUMBIA
SUMTER
FLORENCE
MYRTLE BEACH
CHARLESTON-NORTH CHARLESTON
ROWAN
LINCOLN
GASTON
CABARRUS
UNION
CHEROKEE
SPARTANBURG
YORK
PICKENS
GREENVILLE
OCONEE
ANDERSON
LAURENS
NEWBERRY
ABBEVILLE
GREENWOOD
SALUDA
EDGEFIELD
MCCORMICK
AIKEN
RICHMOND
CHESTER
LANCASTER
CHESTERFIELD
MARLBORO
FAIRFIELD
KERSHAW
LEE
DARLINGTON
DILLON
MARION
HORRY
RICHLAND
LEXINGTON
CALHOUN
CLARENDON
WILLIAMSBURG
GEORGETOWN
ORANGEBURG
BARNWELL
BAMBERG
ALLENDALE
COLLETON
HAMPTON
JASPER
BEAUFORT
BERKELEY
DORCHESTER
Kannapolis
Concord
Charlotte
Rock Hill
Greenville
Spartanburg
Anderson
Columbia
Florence
Sumter
Myrtle Beach
Aiken
Augusta-Richmond County
North Charleston
Charleston
LEGEND
JACKSON
Metropolitan Statistical Area (MSA)
MAINE
State
ADAMS
County
Newark
Central City
State capital underlined
Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.
N
Scale 1:2,400,000
1 in. = 37 mi.
1 cm = 24 km


TENNESSEE –Metropolitan Areas, Counties, Independent City, and Central Cities
U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration, Bureau of the Census
CLARKSVILLE-HOPKINSVILLE
JOHNSON CITY-KINGSPORT-BRISTOL
NASHVILLE
JACKSON
CHATTANOOGA
KNOXVILLE
MEMPHIS
KENTUCKY
VIRGINIA
MISSOURI
ARKANSAS
MISSISSIPPI
ALABAMA
GEORGIA
NORTH CAROLINA
LEGEND
Metropolitan Statistical Area (MSA)
State
County
Independent City
Central City
State capital underlined
Metropolitan area boundaries are those defined by the Federal Office of Management and Budget on June 30, 1999. All other boundaries and names are as of June 30, 1999.
Scale 1:3,400,000
1 in. = 53 mi.
1 cm = 34 km

ATTACHMENT
TO
INTERROGATORY NO. 25

AT&T PROPRIETARY

AIO Customers Counts by State

(As of September 30, 2003)

State	September AIO Bundled Customers	September AIO Local Only Customers
Alabama		
Floirida		
Georgia		
North Carolina		
Tennessee		
TOTAL		

ATTACHMENT
TO
INTERROGATORY NO. 26

AT&T PROPRIETARY

AIO Local Results for Journals September 2003 per Line

State	September # Lines per Lead Accounts	September # Lines per Customer Locations with Local		Total Local Revenue (w/o taxes)	Total LD Revenue (w/o taxes)	Total LD and Local Charges
Alabama						
Florida						
Georgia						
North Carolina						
Tennessee						
TOTAL- Average						

ATTACHMENT
TO
INTERROGATORY NO. 46

Marketing and Sales-Related Expenses

30. Marketing and sales related expenses include all costs associated with attracting customers and providing support to sales activities. These expenses typically include the costs of locating customers, persuading them to buy, studying and pricing contracts, participating in contract negotiations, storing goods and delivering goods to the customer and handling customer inquiries about orders. Marketing and sales related expenses do not include the costs of rendering and processing customer bills and collecting payments - these are considered to be primarily accounting and treasury functions and are therefore charged to general and administrative expense.

31. The following major functions should be included in marketing and sales-related expense:

Marketing and Product Management

32. Marketing and Product Management includes the following activities:

- Market research on demographics, future social trends and other factors that might affect future customer needs and buying preferences, forecasting, and identification of targets for products and services
- Planning for development and introduction of new services
- Development of pricing strategies and contract terms

Advertising Expense

33. Advertising expenses are all costs incurred to promote the sale of AT&T services/products, provide general information, so as to create or stimulate a favorable public image or create or stimulate a desire to buy AT&T products or services. Accounting for advertising expense is governed by the Accounting Standards Executive Committee Statement of Position (SOP) 93-7, *Reporting on Advertising Costs*, and AT&T policy PO 93-05-003, AL 10-5, *Cost Recognition and Reporting*. AT&T's policy states, "Because of the uncertainty and difficulty in reliably measuring future benefits, virtually all advertising costs should be expensed as incurred." Since SOP 93-7 requires separate financial statement disclosure of advertising costs, special care should be taken to ensure consistent and accurate use of the advertising expense account.

34. Advertising expenses include all costs of creating, producing and implementing advertising including agency fees. Advertising expense should include the following:

- Service specific advertising activities
- Non-service specific advertising such as support of sports events, sponsorship of other public events and campaigns
- Television and radio advertising

Marketing and Sales-Related Expenses (continued)

Advertising Expense (continued)

- Direct-mail, newspaper, and other print advertising
- Company and product catalogues
- Billboard advertisements

35. Advertising expenses DO NOT include free minutes and other discounts (contra revenue).

Promotions and Offer Costs

36. Promotions and offer costs include expenses for promotional activities such as exhibits/displays at trade fairs, gifts given to present and prospective customers, inducements to customers for unrelated products/services that are not part of the normal offerings of the selling business unit, incentives to acquire/retain customers (loyalty programs), and the offer costs of issuing checks

37. Promotional expenses and offer costs DO NOT include free minutes and other discounts (contra revenue).

Sales and Sales Support

38. Includes the expenses of employees who directly interface with customers and sell AT&T products and services or support customer sales. Includes items such as:

    - Expenses of locating customers and soliciting sales
    - Technical support expenses relating to specific contracts, e.g., analysis of specifications engineering for specific product applications, responding to potential customer inquiries, etc.
    - Pricing of specific orders
    - Commissions paid to non-AT&T sales agents for selling to AT&T customers
    - Preparation and signing of customer contracts
    - Clerical support to sales force
    - Sales support systems

39. Examples of types of costs to be included in marketing and sales-related (M&S) expenses are salaries, salesperson commissions, wages, employee expenses, including allocated portions of employee benefit expense, contracted services, occupancy charges such as rent, utilities and house service, material and supplies and allocated portions of support services such as clerical and secretarial work, printing and reproduction.

Marketing and Sales-Related Expenses (continued)

Customer Care

40. Includes costs associated with managing and administering customer accounts. Customer Care includes the following functions and activities:

- Handling customer account inquiries via telephone or correspondence including handling of disputes, account changes (name/address), processing adjustments, and quoting rates and prices.
- Entering and processing service orders and handling order inquiries.
- New customer acquisition costs such as when a customer representative engages in "bridge to sales" activities
- Planning, training and project management functions performed by Customer Care organizations

General and Administrative Expenses

41. This item includes those costs of an overall corporate nature, such as billing, executive policy development, legal, regulatory, or financial expenses, that are incurred primarily to benefit and support the enterprise as a whole and which cannot be assigned to other major categories of business cost and expense. Major components of G&A expenses are:

- Customer account management - billing operations, - This category includes bill rendering, customer payment processing, credit and collections, and bill printing and mailing costs.
- Contracted billing services - The amounts paid to local exchange carriers as well as other external companies for billing and collecting from AT&T customers should be included in general and administrative expense
- Development of internal sales/administrative/billing systems infrastructure.
- Direct employee benefits - Initial recording of expenses associated with furnishing active and retired employee benefits such as disability, pension, accident, savings plan contributions and retired employee insurance. Active employee insurance is reported in the same category as the employee wages. (Used only by HR Finance)
- Other G&A Expense - Expenses incurred for executive, general, and administrative support functions should be reported in Other G&A expense.

General and Administrative Expenses (continued)

42. Other G&A expense includes the following functions:

    - *Executive* – officer level and above (generally sixth level and above and any directly reporting executive support staff)
    - *Accounting and Finance* – accounting and financial reporting, billing and collecting, functions associated with taxes, treasury and insurance operations, financial management, etc.
    - *Public Relations* – media communications, corporate publications, employee information
    - *Human Resources* – policy development on matters relating to personnel, salary, benefits, etc.
    - *Corporate Information Technology Services* – management information systems designed to support corporate functions and general data systems functions which cannot readily be allocated to users
    - *Legal* – general counsel and litigation support, SEC, FCC, and other regulatory, antitrust expenses, etc.

43. In the case where fees are paid to external parties for legal and other services performed in direct connection with an acquisition of an asset, the costs associated with the acquisition should be capitalized as part of the acquisition rather than classified as G&A expense. See AT&T policies PO 93-05-003, AL 10-5, *Cost Recognition and Reporting* and AI 93-04-002, AL 3-6, *Accounting Guidelines for Mergers and Acquisitions.*

44. Examples of costs to be included in Other G&A expense include salaries, wages and expenses of employees performing G&A functions, allocated portions of employee benefit expenses, occupancy charges such as rent, utilities and house service, material and supplies and allocated portions of support services such as clerical and secretarial work, printing and reproduction, and allocated management information systems costs.

45. Overhead expenses which *directly support* business functions, e.g., payroll time reporting and input performed within a functional (e.g., Marketing) organization for functional (e.g., Marketing) workers, should be classified to accounts associated with the functions being supported (e.g., M&S).

46. Interest accruals on all tax related items is considered an overall corporate expense and should be reported in the general and administrative category.

ATTACHMENT
TO
INTERROGATORY NO. 48

Marketing and Sales-Related Expenses

30. Marketing and sales related expenses include all costs associated with attracting customers and providing support to sales activities. These expenses typically include the costs of locating customers, persuading them to buy, studying and pricing contracts, participating in contract negotiations, storing goods and delivering goods to the customer and handling customer inquiries about orders. Marketing and sales related expenses do not include the costs of rendering and processing customer bills and collecting payments - these are considered to be primarily accounting and treasury functions and are therefore charged to general and administrative expense.

31. The following major functions should be included in marketing and sales-related expense:

Marketing and Product Management

32. Marketing and Product Management includes the following activities:

- Market research on demographics, future social trends and other factors that might affect future customer needs and buying preferences, forecasting, and identification of targets for products and services
- Planning for development and introduction of new services
- Development of pricing strategies and contract terms

Advertising Expense

33. Advertising expenses are all costs incurred to promote the sale of AT&T services/products, provide general information, so as to create or stimulate a favorable public image or create or stimulate a desire to buy AT&T products or services. Accounting for advertising expense is governed by the Accounting Standards Executive Committee Statement of Position (SOP) 93-7, *Reporting on Advertising Costs*, and AT&T policy PO 93-05-003, AL 10-5, *Cost Recognition and Reporting*. AT&T's policy states, "Because of the uncertainty and difficulty in reliably measuring future benefits, virtually all advertising costs should be expensed as incurred." Since SOP 93-7 requires separate financial statement disclosure of advertising costs, special care should be taken to ensure consistent and accurate use of the advertising expense account.

34. Advertising expenses include all costs of creating, producing and implementing advertising including agency fees. Advertising expense should include the following:

- Service specific advertising activities
- Non-service specific advertising such as support of sports events, sponsorship of other public events and campaigns
- Television and radio advertising

Marketing and Sales-Related Expenses (continued)

Advertising Expense (continued)

- Direct-mail, newspaper, and other print advertising
- Company and product catalogues
- Billboard advertisements

35. Advertising expenses DO NOT include free minutes and other discounts (contra revenue).

Promotions and Offer Costs

36. Promotions and offer costs include expenses for promotional activities such as exhibits/displays at trade fairs, gifts given to present and prospective customers, inducements to customers for unrelated products/services that are not part of the normal offerings of the selling business unit, incentives to acquire/retain customers (loyalty programs), and the offer costs of issuing checks

37. Promotional expenses and offer costs DO NOT include free minutes and other discounts (contra revenue).

Sales and Sales Support

38. Includes the expenses of employees who directly interface with customers and sell AT&T products and services or support customer sales. Includes items such as:

    - Expenses of locating customers and soliciting sales
    - Technical support expenses relating to specific contracts, e.g., analysis of specifications engineering for specific product applications, responding to potential customer inquiries, etc.
    - Pricing of specific orders
    - Commissions paid to non-AT&T sales agents for selling to AT&T customers
    - Preparation and signing of customer contracts
    - Clerical support to sales force
    - Sales support systems

39. Examples of types of costs to be included in marketing and sales-related (M&S) expenses are salaries, salesperson commissions, wages, employee expenses, including allocated portions of employee benefit expense, contracted services, occupancy charges such as rent, utilities and house service, material and supplies and allocated portions of support services such as clerical and secretarial work, printing and reproduction.

Marketing and Sales-Related Expenses (continued)

Customer Care

40. Includes costs associated with managing and administering customer accounts. Customer Care includes the following functions and activities:

- Handling customer account inquiries via telephone or correspondence including handling of disputes, account changes (name/address), processing adjustments, and quoting rates and prices.
- Entering and processing service orders and handling order inquiries.
- New customer acquisition costs such as when a customer representative engages in "bridge to sales" activities
- Planning, training and project management functions performed by Customer Care organizations

General and Administrative Expenses

41. This item includes those costs of an overall corporate nature, such as billing, executive policy development, legal, regulatory, or financial expenses, that are incurred primarily to benefit and support the enterprise as a whole and which cannot be assigned to other major categories of business cost and expense. Major components of G&A expenses are:

- Customer account management - billing operations, - This category includes bill rendering, customer payment processing, credit and collections, and bill printing and mailing costs.
- Contracted billing services - The amounts paid to local exchange carriers as well as other external companies for billing and collecting from AT&T customers should be included in general and administrative expense
- Development of internal sales/administrative/billing systems infrastructure.
- Direct employee benefits - Initial recording of expenses associated with furnishing active and retired employee benefits such as disability, pension, accident, savings plan contributions and retired employee insurance. Active employee insurance is reported in the same category as the employee wages. (Used only by HR Finance)
- Other G&A Expense - Expenses incurred for executive, general, and administrative support functions should be reported in Other G&A expense.

General and Administrative Expenses (continued)

42. Other G&A expense includes the following functions:

    - *Executive* – officer level and above (generally sixth level and above and any directly reporting executive support staff)
    - *Accounting and Finance* – accounting and financial reporting, billing and collecting, functions associated with taxes, treasury and insurance operations, financial management, etc.
    - *Public Relations* – media communications, corporate publications, employee information
    - *Human Resources* – policy development on matters relating to personnel, salary, benefits, etc.
    - *Corporate Information Technology Services* – management information systems designed to support corporate functions and general data systems functions which cannot readily be allocated to users
    - *Legal* – general counsel and litigation support, SEC, FCC, and other regulatory, antitrust expenses, etc.

43. In the case where fees are paid to external parties for legal and other services performed in direct connection with an acquisition of an asset, the costs associated with the acquisition should be capitalized as part of the acquisition rather than classified as G&A expense. See AT&T policies PO 93-05-003, AL 10-5, *Cost Recognition and Reporting* and AI 93-04-002, AL 3-6, *Accounting Guidelines for Mergers and Acquisitions*.

44. Examples of costs to be included in Other G&A expense include salaries, wages and expenses of employees performing G&A functions, allocated portions of employee benefit expenses, occupancy charges such as rent, utilities and house service, material and supplies and allocated portions of support services such as clerical and secretarial work, printing and reproduction, and allocated management information systems costs.

45. Overhead expenses which *directly support* business functions, e.g., payroll time reporting and input performed within a functional (e.g., Marketing) organization for functional (e.g., Marketing) workers, should be classified to accounts associated with the functions being supported (e.g., M&S).

46. Interest accruals on all tax related items is considered an overall corporate expense and should be reported in the general and administrative category.

ATTACHMENT
TO
INTERROGATORY NO. 53

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	**CC Docket No. 01-339,**
Review of the Section 251	)	**No. 96-98 &**
Unbundling	)	**No. 98-147**
Obligations of Incumbent Local	)	
Exchange Carriers	)	
	)	

DECLARATION OF IRWIN GERSZBERG
ON BEHALF OF AT&T CORP.

I. BACKGROUND

1. My name is Irwin Gerszberg. I am a Division Manager in the Advanced Local Network Access Technology Organization for AT&T Local Services in Florham Park, NJ. The organization that I lead is responsible for all "Last Mile" Access Technologies for the AT&T Local Services Network Accordingly, I have a detailed understanding of the architecture, facilities and equipment used in local networks.

2 I received a Bachelor's degree in Electrical Engineering from the New Jersey Institute of Technology and a Master's degree in Computer Science from Stevens Institute of Technology I joined the Bell System in 1978. While at Bell Laboratories, I managed large software projects for the Regional Bell Operating Companies ("RBOCs") in advanced operations and testing of the local exchange network. In 1985, I led one of AT&T's first Speech Response/Voice Recognition Trials with the RBOCs In 1989, I joined AT&T's Wireless unit, where I was responsible for the development of numerous advanced wireless technology services

3 Since that time, through a variety of positions, I have explored network architectures that encourage the development of high-speed broadband technology into homes and businesses – *i.e.*, services based upon DSL transmission technology. In particular, I created many of the applications and devices used to provide high-speed services that are DSL-based My inventions include, for example, a version of an Integrated Access Device that allows service providers to deliver multiple services (*e.g.*, high-speed data, packet voice lines, video) over a single twisted pair (Patent No US6359881). I hold patents for other inventions that permit customers to easily perform multiple-line voice and data installations and integrate their communications devices with wireless technology.

4. I hold 65 Patents on local access technologies covering DSL, Voice over DSL, IP Cable telephony, Broadband Wireless and a vast array of emerging broadband infrastructure and services. For instance, another of my inventions specifies a technique to dynamically allocate and actively manage available bandwidth to voice and high-speed data services over twisted pair (Patent No. US6307839). I am a member of the New Jersey Technology Counsel, the Association of Public-Safety Communication Officials, the Society of Cable Telecommunications Engineers, and the Institute of Electrical and Electronic Engineers. As a result of my work, I earned AT&T's Science and Technology Medal in 2001 In addition, in February 2002, I was named "New Jersey Inventor of the Year" by the State of New Jersey and inducted into the New Jersey Inventors' Hall of Congress for my contributions to science and technology in the telecommunications industry.

II. SUMMARY AND INTRODUCTION

5 The purpose of my declaration is to describe a means by which customers obtaining local telecommunications services via traditional voice-grade loops may switch carriers using an electronic process Copper loops generally are "hard-wired" to the incumbent

local exchange carrier's ("ILECs") facilities and switch, although the precise method of the hard-wired connection can vary depending on the network architecture employed by the ILEC. When a customer seeks to change to another local carrier that uses its own switch, ILEC technicians typically must remove the existing hard-wired connection and then install a new connection to equipment connected to the new local carrier's switch.

6. From an engineering standpoint, it would be far preferable to avoid the often significant manual work associated with changing the hard-wired connections. Ideally, customers should be able to change local carriers using a fully mechanized and integrated process, specifically a software-controlled process that relies upon software-defined links – like the process used for customers changing their long distance provider At AT&T's request, I have investigated a way in which ILECs and competing carriers could deploy new equipment that would permit such an electronic process to be used for the copper loops that serve most customers Under this solution, which AT&T refers to as "electronic loop provisioning," or ELP, many network facilities, including the existing loop distribution facilities and customer premises equipment, are unchanged What is changed – or, more precisely, upgraded – is the transmission equipment that connects a customer's loop to its local carrier's switch. Critically, it is this upgrade to the transmission equipment that allows customers to switch local providers using a software-controlled process

7. ELP deploys equipment that converts all of the customer's telecommunications services – both data and voice – into packets of data "Packetizing" data communications is already commonly performed when a customer purchases DSL-based service There, the local service provider deploys equipment that packetizes only the portion of the communications that use the high frequency spectrum ("HFS") of the loop However, the decision to packetize only

this portion of the communications is not dictated by any technical concerns. In fact, under ELP, this same concept would be extended to all communications, including voice communications that generally occupy the low frequency spectrum ("LFS") portion of the loop. This modest change is nonetheless fundamental, because it allows the customer to change local carriers electronically.

8 ELP can be deployed today using equipment that vendors are currently offering. Indeed, customers with DSL-based services already use modems that include much of the technology that also would be used with ELP Thus, ELP relies on much of the existing local network facilities, but deploys upgraded and/or additional equipment that provides the ability to change carriers electronically. In fact, in order to improve the efficiencies and capabilities of their networks, incumbent carriers today are already deploying equipment and facilities similar to or the same as what would be deployed under ELP – *i.e.*, digital loop carriers, ATM modules, and fiber transport facilities. However, the incumbent carriers currently deploy this technology in a manner that benefits only their own service offerings, and that in fact significantly hinders the efforts of competing carriers to provide service The ELP architecture, by contrast, deploys this type of equipment in a manner that permits all carriers, including the incumbent, to have an equal opportunity to readily access a customer's loop using an electronic process.

9 ELP therefore has significant benefits for competition, but it is also superior from an engineering and operational perspective Most notably, it eliminates the need for manual "hot cuts" on the customer's facilities to break the existing hard-wired connection – a process that is inefficient, unreliable, and prone to error. The ELP architecture also promotes advanced services such as xDSL high-speed data, can provide additional voice lines using the same loop for all services, and can be engineered in a manner (if so desired) to increase network reliability

III. ELECTRONIC LOOP PROVISIONING BUILDS ON THE EXISTING NETWORK AND COULD BE IMPLEMENTED TODAY USING READILY AVAILABLE TECHNOLOGY

A. For A Customer To Change Local Service Providers, The ILECs' Current Network Architecture Requires Manual Changes To The Facilities Serving The Customer

10. Before explaining how ELP can be implemented, it is important to understand how local service is typically provided to customers served with voice-grade loops. In some cases, copper facilities are used all the way from the customer premises to the incumbent LEC's central office, the building where end-users' loops are joined to switching equipment. In this instance, the copper loops are hard-wired to a Main Distribution Frame, ("MDF"), and are then "cross-connected" using another copper wire (or "jumper") to a hard-wired connection on the other side of the MDF. The other hard-wired connection is then connected to the ILEC switch

11. When a customer that is served by a voice-grade loop changes its existing local service to a switch-based competitor of the ILEC, an ILEC technician must generally perform a "coordinated hot cut " This intensely manual process requires the technician to remove the existing cross-connect, and then install a new cross-connect so that the customer's loop is terminated on equipment located in the competitor's collocation cage, rather than the ILEC switch. I am aware that AT&T has had significant problems in using hot cuts to serve customers While the details of those problems are fully described in other portions of AT&T's filing, the critical fact for the purpose of my declaration is that when a customer seeks to change its local service from the incumbent LEC to another local carrier that uses its own switch, significant manual work is required on the loop facilities that serve that customer. As a general rule, when compared to software-controlled processes, manual work is costly, slow, and more prone to error

12. Increasingly, the incumbent carriers have deployed digital loop carriers ("DLCs"), which are pieces of equipment that are often located remotely from the central office and closer to the customer premises. The DLC and associated equipment takes the communications coming over the copper loops and converts the signal into a digital format, so that communications can be transported more efficiently to the central office

13 In a standard configuration for DLC existing today, a copper loop runs directly from the customer's premises to a serving area interface ("SAI"). This portion of the loop is known as the distribution plant The SAI is a point where the copper distribution "sub-loop" from a number of customers terminate Typically, the loops are cross-connected to additional copper facilities that connects the SAI to a remote terminal ("RT") RTs are enclosures often located in the ILEC's outside plant – i e , closer to the customers' premises. The remote terminal typically houses the DLC and other equipment that converts the analog voice communication into a digital format.[1] At that juncture, all the communications from the loops on the DLC are multiplexed together (to efficiently utilize costly transmission facilities) and transmitted through facilities (either fiber or copper wire) commonly known as the feeder plant of the local loop The traffic carried over the feeder plant is terminated directly onto the ILEC's local circuit switch, and is not demultiplexed. Accordingly, in a DLC architecture, an individual customer's traffic arrives at the central office commingled with other customers' traffic

14 Because of this fact, where DLC architecture is employed, it is even more difficult to switch a customer's voice-grade loop to a competing carrier's facilities. To serve a

[1] It is important to note that when the copper loops are sufficiently short, DLC equipment can just as easily be deployed in the central office, rather than a remote terminal. Indeed, this is precisely what a competing carrier must do in order to access a voice-grade loop via a hot cut The competing carrier places DLC equipment into collocation that digitizes and multiplexes the voice-grade loops for backhaul to its switch

customer whose loop is connected to a DLC, the incumbent carrier must be able to separate the traffic from a particular customer from the traffic of other customers that is commingled on the feeder facility. Unfortunately, the available processes for removing the customer's loop from the DLC can be even more cumbersome than when a main frame termination exists. Such methods can be time consuming, entail significant costs that the incumbent may seek to impose on the new carrier, and may also cause the customer to receive a degraded level of service.

15. A common method for a competing carrier to serve a customer who has a DLC loop is to remove the customer's loop from the DLC and place it back onto an older copper loop that extends from the customer's premises to the central office However, this method presents a number of difficulties. First, the process of transferring the DLC loop to a copper "spare" loop requires an additional set of manual processes – in addition to the hot cut that I described above. Second, any spare copper loop has necessarily been placed out of service by the ILEC, frequently because they offer customers inferior quality to the digital service provided over DLC. Third, where DLC has been employed from the outset, as frequently occurs in newly constructed areas, there may simply be no spare copper loop at all. Fourth, a spare copper loop necessarily has a longer length of copper than a DLC loop, and reverting to the spare loop lowers the available bandwidth on the loop compared to the DLC loop and necessarily results in a lower grade of service capability

16. Other methods for removing a loop from a DLC so that it can be made available to a competitor are equally flawed. For example, the ILEC could install demultiplexing equipment before the feeder facility terminates into the ILEC circuit switch That would demultiplex *all* of the traffic from a DLC-fed feeder and re-convert the traffic from a digital to an analog format The particular loop used to serve the customer won by the competing carrier

would then be separated through the hot cut procedure from the other loops and then connected to the carrier's facilities in collocated space At that juncture, the competitor would *again* convert the analog signal on that loop to digital format and transport it over a DLC to its switch. It is obviously inefficient to perform all of the conversions needed to enable a competitor to obtain access to individual loops, and the cost of the additional conversions may make it prohibitively expensive to provide service

17 Thus, regardless of whether a voice-grade loop is connected to a DLC or terminates directly to the ILEC central office, customers that wish to change to a local carrier that uses its own switch must endure a difficult process that necessarily requires extensive manual work to the customer's existing facilities and that often results in more expensive and/or lower quality service.

B. ELP Architecture Would Permit Customers To Change Local Service Providers Electronically

18 Unlike the current local network architecture, once the ELP architecture has been implemented and communications on both the HFS and LFS portion of the loop are packetized, customers could easily change local carriers electronically without any further changes to the underlying facilities serving the customer

19 The ELP architecture transforms the loop connection between an end user and the customer's chosen local carrier from a hard-wired physical connection to one that is controlled by software While the ELP architecture entails incremental investment to modernize the loop plant, it leverages existing investments already made by incumbent LECs and competitive local carriers Notably, ELP functions with existing copper distribution loop plant and with existing circuit switches In addition, customers generally will retain their existing customer premises equipment, inside wire, and network interface devices

20. The transformation of the hard-wired connection to a software-controlled process is accomplished by techniques currently used in Asynchronous Transfer Mode (ATM) networks, a well-established technology that allows packets of data to be routed according to specified instructions Specifically, communications on the HFS and LFS of the loop are broken into cells(which are the particular form of data packet employed in ATM technology), and each cell contains a "header" and other information that allows the transmission equipment to determine the physical facility over which the cells should be routed The end result is a "permanent virtual circuit," which is not defined by a physical connection, but rather controlled by software [2]

21. The changes in technology and equipment that would be necessary to implement the ELP architecture can be viewed in three segments The first segment pertains to the changes that are needed in the incumbent LECs' outside loop plant – the portion of the network that is located outside of the central office up to the end-user premises. The second area where changes are needed is the incumbent LEC central office. The third set of changes relates to the equipment that would be used by all local carriers that elect to employ a traditional Class 5 circuit switched network to carry voice traffic under the ELP architecture. To illustrate the ELP

[2] The circuit is permanent in that it is a static, provisioned connection between two points (e.g. the customer's copper facility and the network of the competitive local service provider) that is established via software configurations and commands PVCs are programmed and defined so that an end-user's traffic is always transmitted between the two particular points according to a pre-determined physical path. Unlike the existing local network architecture, which requires the use of cumbersome manual activities in order to re-wire an end-user to an alternative carrier, ATM technology inherent in ELP requires only that the virtual path be redefined by updates to ATM cell header information and ATM module routing tables Each ATM cell contains two main components—a header and a payload The header is comprised of several fields which, among other things, is used by ATM modules to route traffic ATM cell header information and ATM module routing tables work in conjunction to determine whether a particular PVC (and its associated end-user traffic) should be transported from the end-user to the ILEC's network or to that of an alternative carrier. Any change to a customer's local carrier merely requires updates to the cell header address and ATM module routing tables — each of which can be achieved easily via the use of software Simply put, ATM cells can be instructed by software to go from one point to another as desired—such electronic routing flexibility is the foundation of ELP

architecture, I have included a diagram that demonstrates how and where this equipment would be placed in carriers' networks *See* Figure 1.

1. The Incumbent LEC Outside Loop Plant

22. Under ELP, the key difference from the standard outside plant configuration described above is that transmission electronics in the RT, or DLC equipment, would be deployed or upgraded to digitize and packetize *all* communications traffic, not just the communications traffic in the HFS portion of the customers' loops, as is currently the case with ILECs' current DSL-based offerings. This packetization is performed by "true" Next Generation DLC ("tNGDLC") equipment that includes a functionality commonly known as a voice cell processor. Where the ILEC has already deployed a DLC, then that equipment would be upgraded to the tNGDLC. Where the customer loops terminate at the ILEC central office, then the tNGDLC functionality will be deployed at the central office

23 The tNGDLC and its associated voice cell processor perform the critical function of digitizing and converting the voice signals into cells (or, for terminating calls, from cells into a bit stream and then an analog voice signal).[3] Specifically, the tNGDLC equipment and the voice cell processors take the customers' telecommunications traffic – both voice and data – and convert it into the ATM packet format For traffic originated by the customer, the tNGDLC electronics convert all communications into ATM cells and manage the transfer of these cells over transport facilities (generally fiber). Conversely, for traffic that is to be terminated to a

[3] Critically, however, this is not a "new" technology Rather, it is the natural evolution of digital transmission technology, that has existed for many years In the 1970s the traditional loop architecture of copper pairs was supplemented by the introduction of DLC with high-capacity fiber feeder NGDLC simply permits improved signal discrimination and more efficient pair gain (multiplexing) so as to permit more data to transit a conductor per unit of time Moreover, the introduction of NGDLC architecture does not create new services Rather, the technology permits the ILECs to better employ the transmission capacity of existing facilities while also increasing their own economies in their loop plant

customer, the traffic is routed in ATM cell form to the RT, where the tNGDLC will direct the cells to the appropriate line card on which the customer's line is terminated [4] If a voice service is involved, the line card electronics will decompose the ATM packet cells into a binary stream (i e , a continuous stream of digits where each grouping of eight digits represents a number) and then into analog format (where the preceding numbers represent a particular voltage level of the analog waveform to be generated). As a result, no changes need to be made to the traditional telephone sets that a customer is using and end-users can continue to use existing CPE for traditional voice service At the same time, customers that want advanced services, such as additional derived voice lines, DSL-based services, and/or other high speed data services, would need to install compatible CPE and the appropriate line card electronics would be required in the DLC [5] This is similar to the requirement that customers who today subscribe to DSL-based service must install a DSL modem on their computer.[6]

24 Once packetized by the tNGDLC equipment at the RT, all of a customer's telecommunications traffic is transported over a multiplexed facility, generally a high capacity fiber feeder facility, to the incumbent LEC central office. This is a significant improvement over the existing outside plant architecture that ILECs have traditionally deployed to support for DSL-

[4] Although not necessary to implement ELP, additional efficiencies could be achieved if a remotely operated cross-connection device were deployed somewhere between the SAI and the RT. The cross-connection device would allow the carrier to change the line card that serves a customer remotely As a consequence, a customer could switch to a service requiring a different type of line card – from plain voice service to DSL, for example -- without requiring a technician to visit the RT to manually switch the customer to a new line card

[5] Specifically, such advanced services would require the deployment of a compatible Integrated Access Device (IAD) at the customer premises An IAD is simply a device that supports voice, data, and video information streams over a single circuit

[6] Significantly, however, ELP should *not* require customers who already have DSL-based services to replace their modems (which are simply a type of IAD)

based services. Under the ILECs' current NGDLC architectures, separate feeder facilities are required· an ATM facility to transport the HFS transmissions and a time-division multiplexed ("TDM") facility for the LFS transmissions. This is an inefficient and costly design, because two parallel facilities (each of which is typically backed-up with an alternative facility) are used to transport traffic between the very same points – the RT and the central office. By contrast, where *all* the traffic is packetized, as would occur with the ELP architecture, one common feeder facility can be used between the RT and the central office for all types of traffic.

2. The Incumbent LEC Central Office

25. Under the ELP architecture, the fiber facility that carries traffic from the RT would not connect directly to the ILEC circuit switch, as occurs today with copper loops. Instead, as with the HFS transmissions in the ILECs' NGDLC architecture, the feeder terminates at an ATM module That module serves as a multiplexer that allows the RT electronics (and traffic from the customers' loops) to be shared among all local carriers' networks. ATM cells can carry any type of communications traffic, and ATM technology also permits strict enforcement of service quality levels that can vary by application [7]

26 The ATM module serves as the point of demarcation between the incumbent LEC loop plant and the network of all local carriers, including the incumbent. The ATM module would also serve as the interconnection gateway for carriers to access the loops of retail customers. This is necessary because, as with "ordinary" NGDLC technology, the ATM module is the point at which all of the packetized communications converge for all the loops served by the feeder facility Thus, the ATM module under the ELP architecture, as with any other multiplexer/demultiplexer, is necessary to sort out the commingled traffic carried by the feeder

[7] For example, an ATM can be configured to provide a higher priority to identified categories of cells (*e.g.*, for certain customers or for certain types of traffic)

facility and deliver it to the customer's chosen carrier, whether an ILEC or a competitor. Likewise, the ATM module must sort the cells received from various carriers so that they are "cross-connected" – by the software-controlled permanent virtual circuit – to the correct RT and customer facility. Indeed, without this sorting function, no carrier, including the incumbent, can identify its own customers' traffic for delivery to its network

27. Each local carrier seeking to serve customers whose loops terminate at that central office, including the ILEC, would use appropriate facilities connected to the ATM module (e.g. Type I or Type II DS-1, DS-3, OC-3, etc transport facilities) to transport its end-user traffic to its own network (e g. circuit switched and/or packet networks based on the carrier and service being provided).[8] By connecting to the ATM module, any competing local carrier could readily access the facilities used to serve all end-users connected to the central offices where the ATM is located All competing carriers, including the incumbent LEC, would be assigned one or more physical ports on the ATM module (e g. DS-1, DS-3, OC-3, etc. ports), and the telecommunications traffic from their end-users would be identified by the ATM and directed to that port(s) for transport to the identified carrier's network based upon the permanent virtual circuit established for the customer-carrier combination.

28 The ATM module and the associated tNGDLC located at the RT allow a customer to switch local carriers electronically, with no manual or physical changes to the underlying facilities, because, as described earlier, the ATM technology inherent to ELP creates the permanent virtual circuit for each customer As a consequence, if a customer wishes to change

[8] The incumbents' circuit switches would be located in the same central office, and their packet switches would likely be located there as well Competitors' packet switches may be collocated in the same central office as the ATM, at a hub collocation or elsewhere However, if a CLEC deploys a traditional circuit switch, the Commission's rules would not permit it to be placed in a collocation

service providers, the ELP architecture allows that migration to occur entirely using software, with no need for a manual hot cut. A software command to the ATM module, and the associated tNGDLC electronics at the RT, allows the existing path to one carrier's network to be re-defined to a new carrier's network

3. VoATM Gateways

29. In order for packetized voice communications traffic to be handled by traditional circuit switched voice networks, VoATM gateway equipment must be deployed by all local carriers that wish to serve customers under the ELP architecture using a traditional circuit switched network

30. For transmissions from the circuit switched PSTN that will be terminated to the customer, the VoATM gateway converts TDM-based voice traffic to ATM cells. For telecommunications traffic originated by the customer towards the circuit switch network, the VoATM gateway processes the voice packets to meet the GR-303 or GR-8 protocol, which are interface requirements for connecting the local loop to a Class 5 switch. DLCs equipped with these interfaces are commonly found in local carriers' networks Vendors of VoATM gateways utilize a GR-303 or GR-8 interface to preserve the carriers' investment in Class 5 switching equipment The GR-303/GR-8-equipped gateway will allow service providers to deliver service to end users that utilize the full feature set of the Class 5 switch

31 As a result, despite the modernization of the loop architecture, end-users will continue to have to all Class 5 switch features without any modification required of the Class 5 switch network, and the current investment in Class 5 switches can remain in place

C. <u>The ELP Architecture Can Be Deployed Today</u>

32 Most significantly, the ELP architecture relies entirely on equipment that is readily available from vendors The foundation for ELP architecture is the application of ATM

technology to the entirety of customers' traffic ATM is a tried and tested technology that is already widely deployed Moreover, all of the equipment that takes advantage of ATM technology and which represent the significant network elements of the ELP architecture – tNGDLC, ATM modules and VoATM gateways – are generally available today.

33 While it would take considerable effort to implement ELP technology simultaneously on a nationwide basis, the architecture permits a phased-in approach so that the necessary equipment could be deployed by ILECs in stages. This is also how long distance equal access technologies were deployed in the 1980s. See Attachment G to AT&T's Comments.

IV. ELP PROVIDES SIGNIFICANT ENGINEERING BENEFITS

34 The ELP architecture offers numerous benefits over the ILECs' current network. Most significantly, customers would be able to change local service providers electronically, and without any manual work on underlying facilities While that of course provides enormous benefits for competition, as an engineer, I focus on the technical and operational benefits, which are also highly substantial

35 First, from an engineering and operational standpoint, it is far preferable for competing carriers to be able to use software to access a customer's loop, rather than rely on manual work by technicians The hot cut process requires significant manual processing, and introduces a number of points-of-failure of the sort that engineers strive to avoid when designing a network Manual activity brings with it opportunity for human error, as well as increases in delay and cost, that generally can be avoided through automation [9] By contrast, an electronic,

[9] Notably, an automated process reduces the need for technicians of competing carriers to work in and around the ILEC central office As I understand it, several ILECs have recently flagged this issue as a security concern

software-defined process for changing carriers is more reliable, offers improved functionality, and is more efficient – all attributes that are critical functions in a properly designed network.

36. Second, the ELP architecture uses much existing technology, while permitting customers to have better access to high speed or advanced services networks. ELP does not require carriers to forego serving such markets because of the impracticality of replacing or partially replicating the ILECs' loop plant. At the same time, from the ILECs' perspective, ELP uses the existing network interface devices, copper distribution, and existing fiber feeder.

37 Moreover, ELP enables carriers and customers to obtain the benefits of an advanced network that offers electronic access to loops and to customers. Customers seeking advanced services can use existing DSL technology with ELP architecture [10] In addition, the approach has the potential to standardize a wireline broadband interface to customers, which, in turn, would almost certainly encourage new broadband applications and a proliferation of core advanced services networks Customers that require only voice services may continue to use their existing equipment, but get the benefits of competition The ELP architecture will allow delivery of voice services that are equivalent to the current ILEC voiceband services in terms of performance and reliability. From the perspective of the Class 5 switch, the ELP architecture presents an interface that is equivalent to GR-303/GR-8 technology in common usage today

38. In addition, the ELP architecture, if so desired, can be engineered to account for other considerations such as increased network survivability in the face of network disasters — natural or other For example a fiber feeder ring architecture could be implemented that would link sub-tending RTs (and their associated electronics, e g tNGDLCs) to one or more ILEC

[10] To do this, the customer would require the appropriate premises equipment and the incumbent would need to provide appropriate interfacing line card electronics in the DLC with those electronics being incremental costs not associated with POTS

central offices, therefore mitigating the impact of a disaster upon end-users. Naturally, the benefits of such considerations must be placed in the context of the incremental investment that will be necessary to achieve them Nonetheless, it is important to keep in mind that the ELP architecture is sufficiently flexible in design in order for such considerations to be accounted for in the architecture.

VERIFICATION PAGE

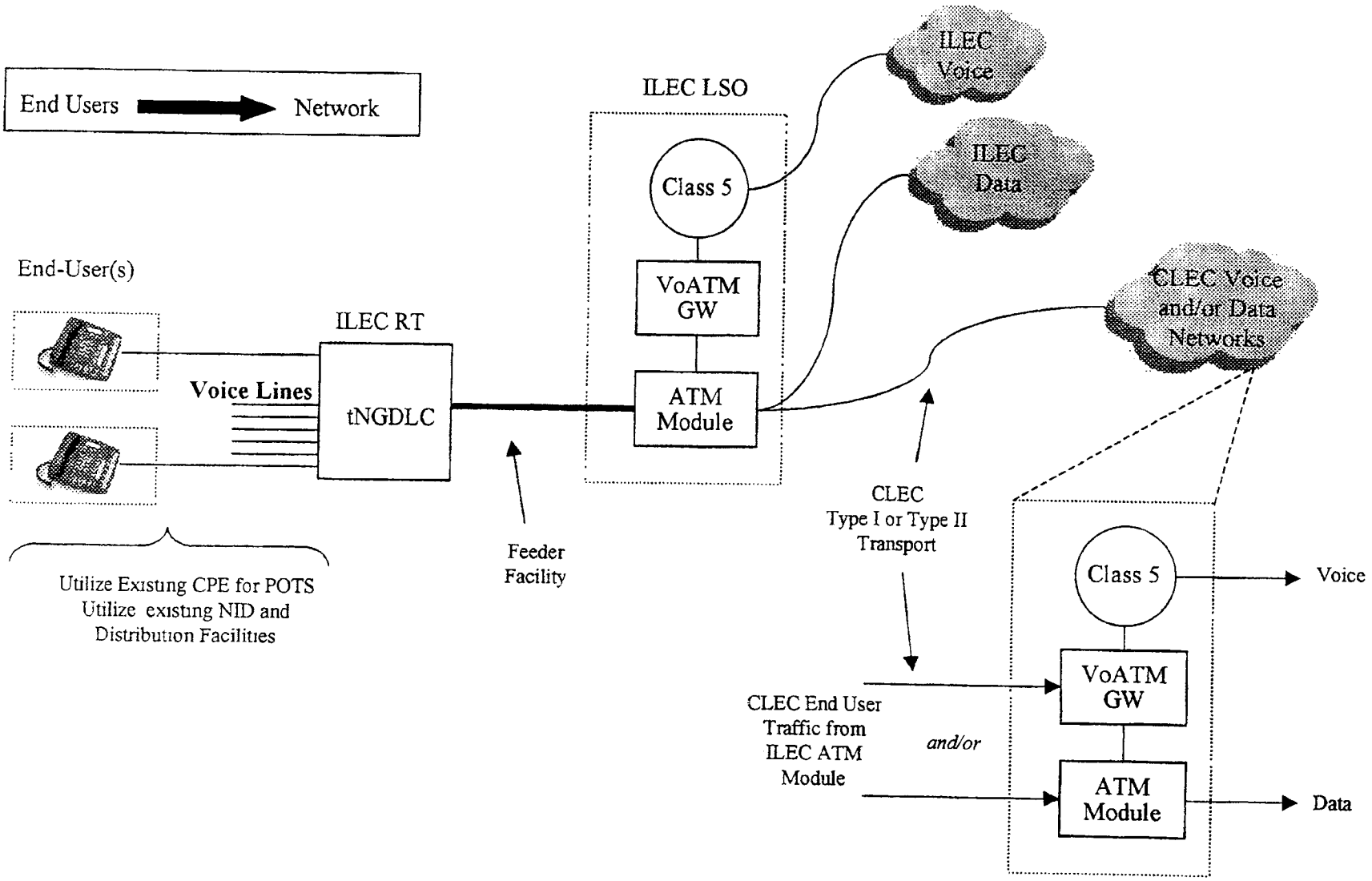
I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Irwin Gerszberg

April 4, 2002

Exhibit 1

General ELP Network Architecture Diagram



Note · The ELP architecture can be designed and engineered in several different ways. This is a general illustration of the ELP architecture / flow through.

ATTACHMENT
TO
INTERROGATORY NO. 70

Florida Competitive Issues Forum
Tracking Tool

1

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	1	Lack of Triggers During Porting Process		RD	
Originating Company (ies):[6]					
Description[7]					
BellSouth cannot or will not use 10 digit triggers in some of their switches, which means that ported numbers do not automatically disconnect during the porting process. This puts our large Direct Inward Dialing (DID) customers at risk of losing dial tone during number porting.					
Meeting Notes[8]					
Resolution[9]					

2

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	41	Pending Facilities			
Originating Company (ies):[6]					
Description[7]					
There are a high number of pending facilities in Florida when UNE loops or T1s are ordered. This delays the orders for an unpredictable amount of time, and BellSouth cannot generally give a firm date when facilities will be available. In February, from 6.66 to 13.79% of analog UNE loop orders were placed in jeopardy in Florida. The retail analog ranged from .69 % to 1.40%. Digital loops ranged from 10.17% to 51.41%.					
Meeting Notes[8]					
Resolution[9]					

Florida Competitive Issues Forum
Tracking Tool

3

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	157 (2nd part)	Manual Ordering for UNE-P			
Originating Company (ies):[6]					
Description[7]					
"Move" orders for UNE-P customers must be sent manually. AT&T requests an electronic process via LENS and EDI.					
Meeting Notes[8]					
Resolution[9]					

4

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	159	UNE-P classified as resale			
Originating Company (ies):[6]					
Description[7]					
The BST LCSC and CWINS centers refer to UNE-P as "resale" and require ALECs to do the same, which causes confusion both within BST and AT&T. If AT&T calls into a center and asks about UNE-P BST transfers AT&T to the incorrect group which leads to multiple transfers within BST's centers.					
Meeting Notes[8]					
Resolution[9]					

5

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	163	Lack of maintenance support			
Originating Company (ies):[6]					
Description[7]					
AT&T experiences problems when reporting troubles that happen immediately post provisioning. The CWINS maintenance center claims the problem is with provisioning, and the provisioning center won't help because they claim the problem is a maintenance issue.					
Meeting Notes[8]					
Resolution[9]					

6

Issue #	Original Iss # (s) (if applicable)[1]	Title[2]	Impact[3]	Effort[4]	Status[5]
	N/A	Anti-competitive win-back practices of BellSouth			
Originating Company (ies):[6]					
Description[7]					
BellSouth is distributing a flyer to customers which portray CLECs negatively, and which should be stopped as an anti-competitive practice. (See Attached)					
Meeting Notes[8]					
Resolution[9]					

ATTACHMENT
TO
INTERROGATORY NO. 70a

-----Original Message-----

From: Seigler, Bernadette M (Bern), CSLSM
Sent: Friday, May 02, 2003 10:08 AM
To: 'Change.Control@bridge.bellsouth.com'
Cc: Jureidini, Jordana M, CSLSM; 'Cottingham, Valerie'
Subject: UNE to UNE Bulk

BellSouth Change Control,

For the last few months, AT&T and the BellSouth Change Control team have engaged in a Q&A regarding the Manual Interim Process (and Trial) for CR0215, UNE to UNE Bulk Migrations.

In the course of these Q&A discussions, it has become evident that the way in which the CR was implemented leaves AT&T customers with a higher risk of losing service than the individual LSR process currently in place For example, BellSouth's bulk migration process eliminates time specific hot cuts. Not only does this put AT&T's customers at greater risk, it clearly was not sought nor contemplated in CR0215. Further, BellSouth has made clear that it will not perform bulk migrations after hours, although this too is beyond the scope for CR0215 and also is contrary to Section 3.7.2. of the AT&T/BellSouth interconnection agreement

In the 30 months since the CR was submitted, AT&T continues to believe that it is critical that the end user customer experience with the migrations include minimized risk and outage duration. Since the current manua or electronic UNE to UNE Bulk Migration Process still includes outage risks to end users, AT&T is not in a position to participate in either process at this time.

AT&T requests that BellSouth develop plans immediately to enhance the UNE to UNE Bulk Migration Proces. to reduce the risk potential for customer outages in a 2003 release.

Thank you,

Bernadette Seigler
AVP
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
Fax: 404-810-8605 or 281-664-3731
Pager: 888-858-7243 Pin: 125159
Email: bseigler@att.com

-----Original Message-----

From: Seigler,Bernadette M (Bern) - NKLAM
Sent: Sunday, August 31, 2003 6:34 AM
To: Change Control [Change.Control@bellsouth.com]
Cc: Jureidini,Jordana M - NKLAM; Janet.Fields@bellsouth.com; Cottingham, Valerie
Subject: RE: AT&T's Response to BellSouth's Response to AT&T's concerns re: UNE to UNE Bulk Migrations

email sent August 31, 2003 at 6:30 AM ET

Change Management Team:

I'm distressed by your response and lack of appreciation for AT&T's goal of proactively working with BellSouth in the development and implementing a UNE-L bulk ordering process. AT&T has continued to wo with BellSouth in the development of this process only to be disappointed in BellSouth's lack of regard for en user experience. BellSouth's latest response back in May to AT&T is not acceptable as it only continues to impair the CLECs ability to have a bulk ordering process with safeguards for the end customer experience.

BellSouth's proposed UNE Bulk process is substantially inferior to the current Coordinated Hot Cut Process f single conversions, which is utilized by AT&T under the terms and conditions of the current ICA. In fact, in spite of the development of a detailed individual hot cut process, designed to meet customer expectations and minimize customer disruptions, BellSouth's proposed UNE-Bulk process does not even address those minimu concerns. For example, the bulk process eliminates time specific cuts and involuntarily increases the risk of th customer being placed out of service because the CLEC cannot plan or anticipate when the conversion will tak place. BellSouth has additionally stated that conversions will not take place Out of Hours. CLECs are again placed at an additional disadvantage because most customers are unwilling to be taken out of service without some way of predicting when it will take place.

AT&T believes, and continues to stress, that the conversion process should be designed to remove as much risk to the end-user as possible. Out of Hours conversions would make the transition of service most transparent to the end user and are also critical to those businesses are not willing to have service disrupted during BellSouth' defined normal business hours.

AT&T has discussed this with BellSouth previously, as it has always been AT&T's desire that the bulk conversion process eliminate many of today's problems with customer outages and impairments. AT&T's position has not changed since our initial letter in August 2002. In fact, AT&T issued follow up correspondenc in October, 2002, requesting a New Business Request (NBR) to address ALL issues, which BellSouth has continually refused to address in its own proposed UNE-L Bulk Ordering Process.

AT&T believes that it would be most productive to defer additional discussion until the ramifications of the FCC order are clear, which will hopefully give more specific direction around the contents of such a UNE Bulk conversion process.

Sincerely,

Assistant Vice President

AT&T Local Services & Access Management
Southeast Region Local Supplier Management & OSS Interconnection
V: 404-810-8956
Fax: 281-664-3731 or 404-810-8605
Pager: 888-858-7243 Pin: 125159
Email: bseigler@att.com

-----Original Message-----
From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com]
Sent: Friday, May 09, 2003 4:44 PM
To: Seigler, Bernadette M (Bern), CSLSM
Subject: BellSouth Response to AT&T's concerns re: UNE to UNE Bulk Migrations

<< File: BellSouth >> << File: U2U.DOC >>

August 30, 2002

VIA FACSIMILE AND MAIL

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: Coordinated Bulk Hot Cut Process

Dear Jim:

The purpose of this letter is to request BellSouth's adoption of a new process in our companies' efforts to address the insufficiency in today's loop-by-loop hot cut process. As we have discussed on several occasions, in spite of its commitment to serving customers on our own local network, AT&T has found it increasingly difficult to use unbundled loops to provide service to our small business local customers. While there are many factors, the inability to complete individual hot cuts in a commercially reasonable manner has proven to be a significant initial hurdle. In fact, in spite of the development of detailed individual hot cut processes to avoid outages, our experience has shown that current methods are unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment.

However, AT&T has achieved a small measure of success in New York where, using an outside contractor, AT&T has been able to convert thousands of customers to AT&T's network using a bulk hot cut process. We wish to implement a similar process in the BellSouth territory. This process allows for the project-based conversion of a number of AT&T customers within a single local serving office ("LSO") and takes advantage of the efficiency of converting a number of lines, after regular business hours, with real time coordination between AT&T and BellSouth. Contrary to the current individual hot cut processes, the bulk conversion process can eliminate many of today's problems with customer outages and the lack of commercial volumes, while at the same time significantly lowering the cost to both BellSouth and AT&T.

Based on the New York experience, it is clear that it would be worthwhile to develop a process which would allow AT&T to migrate those customers currently served on the

UNE platform to AT&T's own network using unbundled loops. More importantly, because a bulk conversion process will be less costly for BellSouth to implement, we would anticipate substantial reductions on UNE-L hot cut charges associated with this process. Therefore, I am now asking for your commitment to work collaboratively with AT&T to fully document and implement the necessary procedures for such bulk conversions. AT&T has identified a number of factors that must be addressed in order to ensure a successful process. Although probably not a comprehensive list, these factors include:

- The ability to convert between 100 – 250 lines within a single LSO at one time;
- The development of a streamlined ordering process to avoid unnecessary individual orders and both the work and costs associated with them;
- A project managed focus at both AT&T and the BellSouth;
- BellSouth's conversion readiness, including dial-tone/ANI testing, loop qualification testing and pre-wiring in advance of the conversion;
- Dedicated personnel at BellSouth for the duration of the conversion process, including personnel able to resolve CFA discrepancies identified during the bulk conversion;
- Commitment of immediate service restoration in the event of a service outage during the conversion process;
- The development of appropriate measurements and tracking to ensure the quality of the process, and if necessary, to further improve the process;
- Substantially reduced prices for UNE-L hot cuts to take into account reduced costs for BellSouth.

Additional requirements, which, we believe, BellSouth already delivers via COSMOS and LENS, are the electronic access to BellSouth's CFA inventory and the ability to identify spare and utilized facilities.

In order to most efficiently develop and test a bulk hot cut process, I suggest that each company designate a representative to lead our implementation teams with this effort. I will lead the AT&T team and ask that you designate the appropriate BellSouth team leader as soon as possible. Given the importance of this process to any attempt by AT&T to use unbundled loops to serve our customers, I ask that negotiations on the process begin no later than September 16, 2002.

Sincerely,

cc: Greg Terry

BELLSOUTH

BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7550
Fax 770-492-9412

September 20, 2002

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your letter of August 30, 2002, regarding AT&T's request that BellSouth adopt a new process for coordinated conversions (hot cuts) of unbundled loop service.

At the outset, your letter makes statements about the quality of BellSouth's current hot cut process performance that do not accurately reflect the level of service BellSouth provides to AT&T. BellSouth has consistently performed AT&T's hot cuts well within the established benchmark, usually 100% within 15 minutes of AT&T's requested start time. BellSouth strongly disagrees with the characterization of its current hot cut methods as "unreliable." I have attached a copy of AT&T's Local Services' Performance trend chart for On Time Installation for Hot Cuts, January through June 2002, which AT&T presented in the last monthly Executive meeting. This chart indicates that AT&T is receiving excellent service from BellSouth on its Unbundled Network Element (UNE) Loop Hot Cut conversions. Furthermore, let me remind you that the hot cut process in your Interconnection Agreement was negotiated by you personally for numerous months. BellSouth is implementing that process not only correctly, but also at extremely high service levels.

Regarding AT&T's request that BellSouth implement a bulk conversion process to migrate AT&T's end users served by Unbundled Network Element-Platform (UNE-P) to UNE Loop, as we have discussed, BellSouth is implementing a bulk conversion process as a result of AT&T's Change Request CR0215. The final user requirements were reviewed with the CLEC community on July 9, 2002. During our conversation, however, you indicated that the new process resulting from CR0215 would not meet the needs of the internal AT&T organization. Those needs apparently have prompted the request for a different new process as outlined in your August 30 letter.

BellSouth believes that the conversion process currently in place, as a result of CR0215, will be a reliable, economical method to migrate "commercial volumes" of UNE-P customers to UNE-Loops and will be mechanized for further convenience by year-end. Nevertheless, AT&T has the option of submitting another CR for the development of a second bulk hot cut process.

Possibly, a more fitting avenue for AT&T's request is BellSouth's New Business Request (NBR). If AT&T needs bulk conversions without individual Local Service Requests (LSR), after normal business hours, with project management and real-time coordination, as well as personnel available after hours to assist AT&T in resolving Connecting Facility Assignment (CFA) discrepancies and immediate service restoration when necessary, the NBR process will allow BellSouth to develop the necessary procedures and establish the market-based rates for the additional resources this proposal would require. Contrary to

AT&T's assertions that the process described will be less costly to BellSouth and, therefore, should result in lower rates for UNE Loops, it will instead add significantly to BellSouth's cost to serve. Those costs, appropriately, will be passed on to AT&T as the recipient of these services.

If we need to further discuss BellSouth's position on AT&T's request, I can be reached at 205 321-4700.

Sincerely,

James M. Schenk

Attachment

Copy to: Greg Terry

Denise C. Berger
Operations AVP
Local Supplier Management

Room 12256
1200 Peachtree Stree
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404 810-8644
FAX 281 664-3648
PAGER 888 858-7243
WIRELESS 404 915-0
deberger@att.com

October 16, 2002

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: UNE-P to UNE-L Coordinated Bulk Conversion Process

Dear Jim:

The purpose of this letter is to follow up on my August 30, 2002, letter to you requesting BellSouth's adoption of a new process to convert AT&T's UNE-P customers to UNE-L via a coordinated bulk conversion process. The purpose of this new process is to allow AT&T to move its customers to AT&T's facilities-based local network. This process should be a seamless transition for AT&T customers moving from UNE-P to the UNE loop with ported numbers.

Please accept this letter as a New Business Request (NBR) from AT&T in accordance with Attachment 10 of our Interconnection Agreement. I have attached a proposed project plan, which outlines the support that AT&T needs from BellSouth to make this project a success. AT&T's goals for this project are as follows: maximize the use of AT&T's local facilities by converting UNE-P customers to UNE loops and minimize any disruption during the transition of AT&T's customers from UNE-P to the UNE loop.

As noted in our previous correspondence, it is AT&T's experience that the bulk process significantly lowers the per line migration cost, including the number port. The economies of scale gained through performing bulk should generally cost less than $5 per loop for this project as outlined in the attached project plan proposal.

Please let me know if additional information is needed to proceed with this project.

Sincerely,

cc: Greg Terry

Denise C. Berger
Operations AVP
Local Supp ler Management

Room 12256
1200 Peachtree Street NE
Atlanta, Georgia 30309
404 810-8644
FAX 281 664-3648
PAGER 888 858-7243 PIN 123
WIRELESS 404 915-0796
deberger@att.com

June 9, 2003

Phillip Cook
BellSouth Interconnection Services
675 West Peachtree Street
Room 34H71
Atlanta, Georgia 30375

RE: NBR GA02-M931-00 Unbundled Network Element – Platform (UNE-P) to UNE-Loop (UNE-L) Coordinated Bulk Conversion Process

Dear Phillip:

The purpose of this letter is to respond to your letter of May 30, 2003, regarding New Business Request (NBR) GA02-M931-00. Your letter stated that BellSouth, pursuant to Section 1.10 of Attachment 10 of the Interconnection Agreement, would consider the NBR cancelled if an acceptance or rejection response was not provided within five (5) days.

In its initial request on August 30, 2002, AT&T indicated that BellSouth's current hot cut methods were "unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment" and proposed a new process, designed to address each concern. Unfortunately, BellSouth has failed to adequately address these concerns.

First, AT&T is disappointed that BellSouth did not provide adequate information regarding the impact to customers served by BellSouth's IDLC facilities. Further, AT&T requested a process, which would allow the conversion of up to 500 customers in two (2) central offices per evening. In its letter of November 20, 2002, BellSouth states,

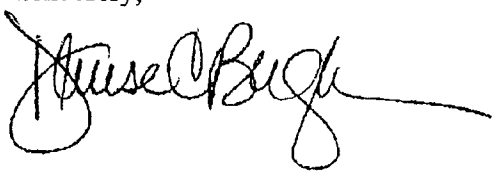
> "BellSouth has determined that AT&T's request is technically feasible with the following caveat:
>
> - The quantity of physical facilities and telephone numbers cut per evening will vary based on the load at the time the request is submitted, and will be driven by the actual number of lines per customer."

AT&T is distressed and concerned with this stated inability of BellSouth to sustain reasonable commercial volumes. AT&T finds BellSouth's unwillingness to commit to AT&T's modest request completely unacceptable.

Finally, BellSouth's ridiculous and excessive cost of $134.32 per working telephone number, plus regular ordering charges, as well as other unspecified overtime and technician charges, prohibits commercial use. BellSouth has once again presented AT&T with a Hobson's choice: risk a devastating disruption of a customer's service or pay BellSouth a ransom to mitigate the risk.

Please consider this letter a rejection of BellSouth's preliminary analysis and firm quote.

Sincerely,



cc: Steve Huels
Jim Schenk

ATTACHMENT
TO
INTERROGATORY NO. 75

August 30, 2002

VIA FACSIMILE AND MAIL

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: Coordinated Bulk Hot Cut Process

Dear Jim:

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Sincerely,

cc: Greg Terry

BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7550
Fax 770-492-9412

September 20, 2002

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

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Sincerely,

James M. Schenk

Attachment

Copy to: Greg Terry

Denise C. Berger
Operations AVP
Local Supplier Management

Room 12256
1200 Peachtree Street NE
Atlanta, Georgia 30309
404 810-8644
FAX 281 664-3648
PAGER 888 858-7243 PIN
WIRELESS 404 915-0796
deberger@att.com

October 16, 2002

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: UNE-P to UNE-L Coordinated Bulk Conversion Process

Dear Jim:

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cc: Greg Terry

Denise C. Berger
Operations AVP
Local Supp ler Management

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Atlanta, Georgia 30309
404 810-8644
FAX 281 664-3648
PAGER 888 858-7243 PIN 123468
WIRELESS 404 915-0796
deberger@att.com

June 9, 2003

Phillip Cook
BellSouth Interconnection Services
675 West Peachtree Street
Room 34H71
Atlanta, Georgia 30375

RE: NBR GA02-M931-00 Unbundled Network Element – Platform (UNE-P) to UNE-Loop (UNE-L) Coordinated Bulk Conversion Process

Dear Phillip:

The purpose of this letter is to respond to your letter of May 30, 2003, regarding New Business Request (NBR) GA02-M931-00. Your letter stated that BellSouth, pursuant to Section 1.10 of Attachment 10 of the Interconnection Agreement, would consider the NBR cancelled if an acceptance or rejection response was not provided within five (5) days.

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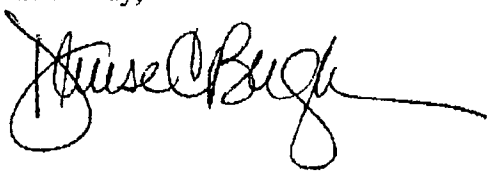

cc: Steve Huels
Jim Schenk

-----Original Message-----

From: Seigler, Bernadette M (Bern), CSLSM
Sent: Friday, May 02, 2003 10:08 AM
To: 'Change.Control@bridge.bellsouth.com'
Cc: Jureidini, Jordana M, CSLSM; 'Cottingham, Valerie'
Subject: UNE to UNE Bulk

BellSouth Change Control,

For the last few months, AT&T and the BellSouth Change Control team have engaged in a Q&A regarding the Manual Interim Process (and Trial) for CR0215, UNE to UNE Bulk Migrations.

In the course of these Q&A discussions, it has become evident that the way in which the CR was implemented leaves AT&T customers with a higher risk of losing service than the individual LSR process currently in place. For example, BellSouth's bulk migration process eliminates time specific hot cuts. Not only does this put AT&T's customers at greater risk, it clearly was not sought nor contemplated in CR0215. Further, BellSouth has made clear that it will not perform bulk migrations after hours, although this too is beyond the scope for CR0215 and also is contrary to Section 3.7.2. of the AT&T/BellSouth interconnection agreement

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Thank you,

Bernadette Seigler
AVP
AT&T Local Services & Access Management
So. Region OSS Interconnection
V: 404-810-8956
Fax: 404-810-8605 or 281-664-3731
Pager: 888-858-7243 Pin: 125159
Email: bseigler@att.com

-----Original Message-----

From: Seigler,Bernadette M (Bern) - NKLAM
Sent: Sunday, August 31, 2003 6:34 AM
To: Change Control [Change.Control@bellsouth.com]
Cc: Jureidini,Jordana M - NKLAM; Janet.Fields@bellsouth.com; Cottingham, Valerie
Subject: RE: AT&T's Response to BellSouth's Response to AT&T's concerns re: UNE to UNE Bulk Migrations

email sent August 31, 2003 at 6:30 AM ET

Change Management Team:

I'm distressed by your response and lack of appreciation for AT&T's goal of proactively working with BellSouth in the development and implementing a UNE-L bulk ordering process. AT&T has continued to work with BellSouth in the development of this process only to be disappointed in BellSouth's lack of regard for end user experience. BellSouth's latest response back in May to AT&T is not acceptable as it only continues to impair the CLECs ability to have a bulk ordering process with safeguards for the end customer experience.

BellSouth's proposed UNE Bulk process is substantially inferior to the current Coordinated Hot Cut Process for single conversions, which is utilized by AT&T under the terms and conditions of the current ICA. In fact, in spite of the development of a detailed individual hot cut process, designed to meet customer expectations and minimize customer disruptions, BellSouth's proposed UNE-Bulk process does not even address those minimum concerns. For example, the bulk process eliminates time specific cuts and involuntarily increases the risk of the customer being placed out of service because the CLEC cannot plan or anticipate when the conversion will take place. BellSouth has additionally stated that conversions will not take place Out of Hours. CLECs are again placed at an additional disadvantage because most customers are unwilling to be taken out of service without some way of predicting when it will take place.

AT&T believes, and continues to stress, that the conversion process should be designed to remove as much risk to the end-user as possible. Out of Hours conversions would make the transition of service most transparent to the end user and are also critical to those businesses are not willing to have service disrupted during BellSouth's defined normal business hours.

AT&T has discussed this with BellSouth previously, as it has always been AT&T's desire that the bulk conversion process eliminate many of today's problems with customer outages and impairments. AT&T's position has not changed since our initial letter in August 2002. In fact, AT&T issued follow up correspondence in October, 2002, requesting a New Business Request (NBR) to address ALL issues, which BellSouth has continually refused to address in its own proposed UNE-L Bulk Ordering Process.

AT&T believes that it would be most productive to defer additional discussion until the ramifications of the FCC order are clear, which will hopefully give more specific direction around the contents of such a UNE Bulk conversion process.

Sincerely,

Assistant Vice President

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-----Original Message-----
From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com]
Sent: Friday, May 09, 2003 4:44 PM
To: Seigler, Bernadette M (Bern), CSLSM
Subject: BellSouth Response to AT&T's concerns re: UNE to UNE Bulk Migrations

<< File: BellSouth >> << File: U2U.DOC >>