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November 24, 2003

Mr. Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37238

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

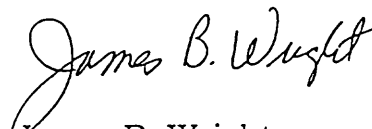
*Implementation of the Federal Communications Commission's
Triennial Review Order (9 Month Proceeding) - Hot Cuts*
Docket No. 03-00526

Dear Mr. Hicks:

Enclosed are the responses of Sprint Communications Company LP to BellSouth's First Set of Interrogatories and Requests for Production of Documents issued in the above proceedings.

Should you have any questions, please contact me.

Sincerely,


James B. Wright

cc: Chairman Debroah Taylor Tate, Chairman (14 copies)
Interested Parties Counsel of Record (one copy)

CERTIFICATE OF SERVICE
Docket No. 03-00491 Mass Market Switching

I hereby certify that on November 24, 2003, a copy of the Responses of Sprint Communications Company LP to BellSouth discovery was served on the following parties of record by air express, by electronic service or via United States mail, postage paid and properly addressed to the following:

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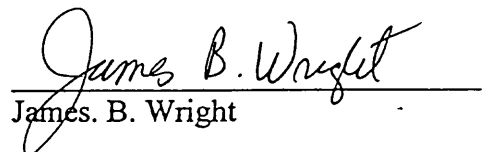
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James B. Wright

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re:

FCC's Triennial Review Order (Nine Month
Proceeding) (Switching)

Docket No. 03-00491

FCC's Triennial Review Order (Nine Month
Proceeding) (Hot Cuts)

Docket No. 03-00526

**SPRINT COMMUNICATIONS COMPANY L.P.'S
RESPONSE TO BELL SOUTH TELECOMMUNICATIONS INC.
FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

COMES NOW Sprint Communications Company L.P. ("Sprint") and hereby responds to the First Set of Interrogatories and Requests for Production of Documents issued by BellSouth Telecommunications, Inc. ("BellSouth") in the above-styled docket. This Response is made subject to the objections of Sprint contained in its November 5, 2003 letter, which objections are incorporated herein.

INTERROGATORIES

1. Identify each switch owned by Sprint that Sprint 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: None.
2. For each switch identified in response to Interrogatory No. 1, please:
 - (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
 - (b) provide the street address, including the city and state in which the switch is located;
 - (c) identify the type of switch by manufacturer and model (e.g., Nortel

- DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
 - (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
 - (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG") or state if the switch is not identified in the LERG.

Response: Not Applicable. See response to Interrogatory No. 1 above.

3. Identify any other switch not previously identified in Interrogatory No. 1 that Sprint 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 Sprint either on an unbundled or resale basis.

Response: None

4. For each switch identified in response to Interrogatory No.3, please:
- (a) identify the person that owns the switch;
 - (b) provide the CLLI code of the switch;
 - (c) provide the street address, including the city and state in which the switch is located;
 - (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
 - (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
 - (f) identify all documents referring or relating to the rates, terms and conditions of Company's use of the switch; and
 - (g) provide information relating to the switch as contained in Telcordia's LERG or explain why the switch is not identified in the LERG.

Response: Not applicable. See response to Interrogatory No. 3 above.

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

Response: Not applicable. See responses to Interrogatories No. 1 and 3 above.

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: Not applicable. See responses to Interrogatories No. 1 and 5 above.

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

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

Response: Not applicable. See responses to Interrogatory No. 6 above.

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: Not applicable. See responses to Interrogatory No. 3 above.

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

Response: Not applicable. See responses to Interrogatories No. 3 and 8 above.

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

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

Response: Not applicable. See responses to Interrogatory No. 9 above.

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 services to any end user customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

Response: See General Objection No. 5. The response contains confidential information and is provided as Attachment A, subject to entry of a protective order.

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

Response: See General Objection No. 5. The response contains confidential information and is provided as Attachment B, subject to entry of a protective order.

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: See General Objection No. 5. The response contains confidential information and is provided as Attachment C, subject to entry of a protective order.

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:
- (a) Provide the 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;
 - (f) Identify all documents referring or relating to the rates, terms and conditions of Sprint's provision of switching capability.

Response: No.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15.

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.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15.

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.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5 and 7 and its Specific Objection to Interrogatory No. 15.

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 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.

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: Sprint adopts and incorporates its General Objection Nos. 1, 5, 7, and 9 and Specific Objections to Interrogatory 19. Subject to, and without waiving these objections, Sprint states as follows: Sprint does not maintain information on an MSA basis. However, data provided in response to Interrogatory 11, and the qualifications stated therein, is the best available information responsive to this request based upon the information available from the Sprint's business records.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5 and 7 and specific Objection to Interrogatory No. 19. Subject to, and without waiving these

objections, Sprint states as follows: Sprint does not maintain information on an MSA basis. However, data provided in response to Interrogatory 11, and the qualifications stated therein, is the best available information responsive to this request based upon the information available from Sprint's business records.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5 and 7 and specific Objection to Interrogatory No. 19. Subject to, and without waiving these objections, Sprint states as follows: Services provided by Sprint can be found in Sprint's Tariff. Please see www.sprint.com/tariffs. To see a list of documents available in each category click on the folder to the left of the word. To see the document itself in PDF format, click on the word itself.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5 and 7 and specific Objection to Interrogatory No. 19. Subject to, and without waiving these objections, Sprint states as follows: Sprint does not maintain information on a MSA basis. However, Sprint currently offers one or more non-qualifying services throughout the state of Tennessee. For example, Sprint currently offers intrastate long distance service throughout Tennessee.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5 and 7 and specific Objection to Interrogatory No. 19. Subject to, and without waiving these objections, Sprint states as follows: Services provided by Sprint can be found in Sprint's Tariff. Please see www.sprint.com/tariffs. To see a list of documents available in each

category click on the folder to the left of the word. To see the document itself in PDF format, click on the word itself.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, Sprint states as follows: Services provided by Sprint can be found in Sprint's Tariff. Please see www.sprint.com/tariffs. To see a list of documents available in each category click on the folder to the left of the word. To see the document itself in PDF format, click on the word itself.

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

Response: See General Objection No. 5 and Specific Objections No. 19 and 24. The response contains confidential information and is provided as Attachment D, subject to entry of a protective order.

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

Response: See General Objection No. 5 and Specific Objections No. 19 and 24. The response contains confidential information and is provided as Attachment D, subject to entry of a protective order.

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: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, Sprint states as follows: As a communications company offering a wide range of services to customers, there is no business purpose for Sprint to separately track and identify customers on the basis of regulatory distinctions between "qualifying" and "non-qualifying" services, and Sprint does not do so.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, see response to No. 25.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, see response to No. 26.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, see response to No. 25.

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: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and Specific Objection No. 24. Subject to, and without waiving these objections, see response to No. 26.

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

Response: See General Objection No. 5. The response contains confidential information and is provided as Attachment D, subject to entry of a protective order.

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

Response: See General Objection No. 5. The response contains confidential information and is provided as Attachment D, subject to entry of a protective order.

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: See General Objection No. 5. The response contains confidential information and is provided as Attachment E, subject to entry of a protective order.

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

Response: See General Objection No. 5. The response contains confidential information and is provided as Attachment F, subject to entry of a protective order.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 6 and 7 and Specific Objection No. 36. Subject to, and without waiving these objections, Sprint states as follows: Sprint cannot state with certainty its percentages of the local exchange market since Sprint does not know the number of end user customers served by every other company in the market. This is further complicated by the fact that some customers use more than one carrier to provide the same services as Sprint or different services than those provided by Sprint to such customers.

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: Sprint adopts and incorporates its General Objection Nos. 1, 5, 6 and 7 and Specific Objection No. 36. Subject to, and without waiving these objections, Sprint states as follows: Sprint has not identified any documents discussing or evaluating market share for local exchange service in Tennessee.

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

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 6 and 7 and Specific Objection No. 36. Subject to, and without waiving these objections, Sprint states as follows: Sprint has not identified any documents discussing or evaluating market share for local exchange service in Tennessee.

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 representative in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 7 and 9 and Specific Objection No. 39.

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 that you would consider in making this type of a decision.

Response: The customer largely decides what transmission system will be used.

41. Is there a typical or average number of DS0s 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 provide that typical or average number and explain how this number was derived.

Response: No.

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

Response: The customer largely decides what transmission system and equipment will be used.

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: Sprint adopts and incorporates its General Objection Nos. 1, 5, 7 and 9 and Specific Objection to Interrogatory No. 43.

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?

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 7 and 9 and Specific Objection to Interrogatory No. 43.

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 year, ten years or some other time horizon over which you evaluate the project?

Response: See Sprint's Specific Objection to No. 15 incorporated herein by reference.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 6 and 7 and its Specific Objection to Interrogatory No. 46. Subject to, and without waiving, the foregoing objections, Sprint states that one possible definition of sales expense are those direct expenditures related to the sales and marketing of services.

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: Sprint adopts and incorporates General Objection Nos. 1, 5, 7, and 9 and its Specific Objections to Interrogatories Nos. 46 and 47.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 6, and 7 and its Specific Objections to Interrogatory No. 48. Subject to, and without waiving, the foregoing objections, Sprint states that one possible definition of general and administrative expense are those type of costs that are not considered to be directly related to the cost of services and products.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 7 and 9 and its Specific Objections to Interrogatories Nos. 48 and 49.

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

Response: None

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

(a) Whether the hot cut was coordinated or not;

- (b) If coordinated, whether the hot cut occurred as scheduled;
- (c) If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Sprint, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- (d) If there was a problem with the hot cut, state whether Sprint complained in writing to BellSouth or anyone else.

Response: Not applicable. See response to Interrogatory No. 50.

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

Response: Sprint takes no position on this issue at this time.

53. Does Sprint 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: Sprint takes no position on this issue at this time.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 6, and 7 and its Specific Objection to Interrogatory No. 54.

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

Response: Sprint takes no position on this issue at this time.

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

Response: Sprint takes no position on this issue at this time.

57. Does Sprint 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: No.

58. Does Sprint have any estimates of what a typical batch 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: No.
59. What is the largest number of individual hot cuts that Sprint 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: Not applicable. See response to Interrogatory No. 58.
60. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Sprint or that Sprint 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: Sprint takes no position on this issue at this time.
61. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Sprint? If so, name the ILEC and provide the rate and the source of the rate.
Response: Sprint takes no position on this issue at this time.
62. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Sprint or that Sprint 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: Sprint takes no position on this issue at this time.
63. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Sprint? If so, name the ILEC and provide the rate and the source of the rate.
Response: Sprint takes no position on this issue at this time.
64. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Sprint or that Sprint 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: Sprint takes no position on this issue at this time.

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

Response: Sprint takes no position on this issue at this time.

66. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Sprint or that Sprint 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: Sprint takes no position on this issue at this time.

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

Response: Sprint takes no position on this issue at this time.

68. Does Sprint order coordinated or non-coordinated hot cuts?

Response: Sprint does not order coordinated or non-coordinated hot cuts from BellSouth.

69. Does Sprint use the CFA database?

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 6, and 7 and its Specific Objections to Interrogatory No. 69.

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

Response: Sprint adopts and incorporates General Objection Nos. 1, 5, 6, and 7 and its Specific Objection to Interrogatory No. 70.

71. What is the appropriate volume of loops that you contend the Tennessee Regulatory Authority 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: Sprint takes no position on this issue at this time.

72. What is the appropriate process that you contend the TRA 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: Sprint takes no position on this issue at this time.

73. If Sprint disagrees with BellSouth's individual hot cut process, identify every step that Sprint contends is unnecessary and state with specificity why the step is unnecessary.
Response: Sprint takes no position on this issue at this time.
74. If Sprint disagrees with BellSouth's batch hot cut process, identify every step that Sprint contends is unnecessary and state with specificity why the step is unnecessary.
Response: Sprint takes no position on this issue at this time.
75. Identify by date, author, and recipient every written compliant Sprint has made to BellSouth regarding BellSouth's hot cut process since October 2001.
Response: Sprint is not aware of any.
76. How many unbundled loops does Sprint contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?
Response: Sprint takes no position on this issue at this time.
77. What is the appropriate information that you contend the TRA should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.
Response: Sprint takes no position on this issue at this time.
78. What is the average completion interval metric for provision of high volumes of loops that you contend the TRA 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: Sprint takes no position on this issue at this time.
79. What are the rates that you contend the TRA should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)?
In answering this Interrogatory, please state all facts and identify all documents supporting this contention.
Response: Sprint takes no position on this issue at this time.
80. What are the appropriate product market(s) that you contend the TRA 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: Sprint takes no position on this issue at this time.

81. What are the appropriate geographic market(s) that you contend the TRA 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: Sprint takes no position on this issue at this time.
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: Sprint takes no position on this issue at this time.
83. Do you contend that there are economic 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 economic barrier, and state all facts and identify all documents supporting your contention.
Response: Sprint takes no position on this issue at this time.
84. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the TRA 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: Sprint takes no position on this issue at this time.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in response to BellSouth’s First Set of Interrogatories.
Response: See General Objection No. 5. See the responses in Attachments A-F provided as attachments to Sprint’s responses to BellSouth’s First Set of Interrogatories which contain confidential information.
2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15, above.
3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide qualifying service.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objections to Interrogatories No. 15, 19 and 26, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you only provide qualifying service.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 24 and 27, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15, 24 and 29, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15, 19, 24 and 31, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory 15, 19, 24 and 32, above. Without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.

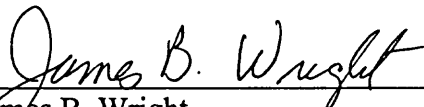
8. Provide all documents referring or relating to the classifications used by Sprint to offer service to end user customers in Tennessee (e.g. residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 6 and 7 above.

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Sprint, as requested. Provide all documents referring or relating to the classifications used by Sprint to offer service to end user customers Tennessee (e.g., residential customers in BellSouth's First Set of Interrogatories, No. 34)
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15, 19, 24 and 34, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.
10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by Sprint, as requested in BellSouth's First Set of Interrogatories, No. 35.
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 15, 19, 24 and 35, above. Subject to, and without waiving the foregoing objections, see Sprint's Response to Request for Production of Documents No. 1.
11. Produce all documents referring or relating to how Sprint determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.
Response: See Sprint's response to Interrogatory No. 40, above.
12. Produce all documents referring or relating to the typical or average number of DS0s at which Sprint would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.
Response: See Sprint's response to Interrogatory No. 41, above
13. Produce all documents referring or relating to the cost of capital used by Sprint in evaluating whether to offer a qualifying service in a particular geographic market.
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 43, above.
14. Produce all documents referring or relating to the time period used by Sprint in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objection to Interrogatory No. 45.
15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, 6, and 7 and its Specific Objections to Interrogatories No. 46 and 47, above.

16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.
Response: Sprint adopts and incorporates its General Objection Nos. 1, 5, and 7 and its Specific Objections to Interrogatories No. 48 and 49, above.
17. Produce all documents referring or relating to any complaints by Sprint or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.
Response: Not applicable.
18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Sprint or that Sprint believes is superior to BellSouth's batch hot cut process.
Response: See Sprint's response to Interrogatory No. 60, above.
19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to Sprint or that Sprint believes is superior to BellSouth's individual hot cut process.
Response: See Sprint's response to Interrogatory No. 61, above.
20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Sprint or that Sprint believes is superior to BellSouth's batch hot cut process.
Response: See Sprint's response to Interrogatory No. 63, above.
21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Sprint or that Sprint believes is superior to BellSouth's individual hot cut process.
Response: See Sprint's response to Interrogatory No. 65, above.

Respectfully submitted this 24th day of November, 2003.


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