

**FARRIS
MATHEWS
BRANAN
& HELLEN**

PLC

Attorneys at Law

Suite 2400
511 Union Street
Nashville, TN 37219
Phone 615 726-1200
Fax 615 726-1776

Attorneys

William W. Farris
Harlan Mathews
Homer Boyd Branan, III
Tim Wade Hellen
Edwin Dean White, III
Charles B. Welch, Jr.
G. Ray Bratton
John Michael Farris
O. Douglas Shipman
D. Edward Harvey
Rebecca Pearson Tuttle
Eugene Stone Forrester, Jr.
Dedrick Brittenum, Jr.
Barry F. White
Robert F. Miller
Robert A. McLean
Anita I. Lotz
Gregory W. O'Neal
Steven C. Brammer
Harold W. Fonville, II
Fred D. (Tony) Thompson, Jr.
Richard D. Click
Jeffrey M. Clark
Pamela Haddock Klavon

Of Counsel

Henry H. Hancock

MEMPHIS DOWNTOWN
Suite 2000
One Commerce Square
Memphis, TN 38103
Phone 901 259-7100
Fax 901 259-7150

MEMPHIS EAST
Suite 400
5384 Poplar Avenue
Memphis, TN 38119
Phone 901 763-4000
Fax 901 763-4095

July 9, 1999

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

REC'D TN
REGULATORY AUTH.

'99 JUL 9 PM 3 36

OFFICE OF THE
EXECUTIVE SECRETARY

RE: *BellSouth Telecommunications, Inc.'s Tariff to Offer Contract Service Arrangement TN 98-6766-00 for Maximum 13% Discount on Eligible Tariffed Services*
TRA Docket No. ~~98~~ 00210

BellSouth Telecommunications, Inc.'s Tariff to Offer Contract Service Arrangement KY 98-4958-00 for an 11% Discount on Various Services
TRA Docket No. ~~98~~ 00244

Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. In Tennessee
TRA Docket No. 98-00559

Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Data Requests of Time Warner Communications of the Mid-South, L.P. and NewSouth Communications to BellSouth Telecommunications, Inc. Copies are being served on parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS, BRANAN
& HELLEN, P.L.C.**

Charles B. Welch, Jr.
Charles B. Welch, Jr. /kms

CBWjr:kms

cc: Carolyn M. Marek
Lori Reese
Parties of record

C:\DATA\CBW\210\WADDELL.708

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE:

BELLSOUTH TELECOMMUNICATIONS, INC.'S
TARIFF TO OFFER CONTRACT SERVICE
ARRANGEMENT TN98-6766-00 FOR MAXIMUM
13% DISCOUNT ON ELIGIBLE TARIFFED SERVICES

DOCKET NO.
98-00210

BELLSOUTH TELECOMMUNICATIONS, INC.'S
TARIFF TO OFFER CONTRACT SERVICE
ARRANGEMENT KY98-4958-00 FOR AN 11%
DISCOUNT ON VARIOUS SERVICES

DOCKET NO.
98-00244

PROCEEDING FOR THE PURPOSE OF ADDRESSING
COMPETITIVE EFFECTS OF CONTRACT SERVICE
ARRANGEMENTS FILED BY BELLSOUTH
TELECOMMUNICATIONS, INC. IN TENNESSEE

DOCKET NO.
98-00559

*DATA REQUESTS OF TIME WARNER COMMUNICATIONS
OF THE MID-SOUTH, L.P. AND NEWSOUTH
COMMUNICATIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.*

Comes now, Time Warner Communications of the Mid-South, L.P. ("Time Warner") and NewSouth Communications pursuant to Tennessee Code Annotated Section 4-5-311 and Rules 33 and 34 of the Tennessee Rules of Civil Procedure and submits these data requests and requests for production of documents to BellSouth Telecommunications, Inc.

In the event the information is not available in the specific format requested, either in part or in total, please provide the information requested in the format maintained in the ordinary course of business. If the following requested information, data or documents are

not available for your Tennessee operations specifically, provide the information, data or documents that includes your Tennessee operations.

All data requests are continuing in nature, and, should any circumstances relating to the subject covered thereby change during the pendency of this proceeding, please notify Time Warner and NewSouth immediately of such changed circumstances.

REQUEST NO. 1: Please provide a detailed explanation of how BellSouth, through its account teams or otherwise, qualified the products and/or services described in Contract Service Arrangement TN98-6766-00, TRA Docket No. 98-00210, and Contract Service Arrangement KY98-49588-00, TRA Docket No. 98-00244 ("CSAs") to be rendered under a Contract Service Arrangement. The explanation should include whether the customers notified BellSouth of a pending offer from a competitor, the identify of the competitor, the terms of the competitor's offer, and the date on which the competitor made a formal offer. If the CSAs were not provided in response to a competitive offer, please describe the circumstances under which the customers entered into the CSAs.

RESPONSE:

REQUEST NO. 2: For each of the services included in the CSAs identified in Request No. 1, please provide the customers' usage patterns and billed revenue for the two years prior to entering into the CSAs with BellSouth.

RESPONSE:

REQUEST NO. 3: For each of the services included in the CSAs identified in Request No. 1, please provide the customers' usage patterns and billed revenue subsequent to entering into the CSAs with BellSouth.

RESPONSE:

REQUEST NO. 4: Please provide the individual cost components (e.g. marketing, accounting, engineering, sales team costs) as well as the total Contract Preparation Charges BellSouth incurred in developing the CSAs identified in Request No. 1.

RESPONSE:

REQUEST NO. 5: Please indicate whether BellSouth has waived the Contract Preparation Charges incurred in developing the CSAs identified in Request No. 1.

RESPONSE:

REQUEST NO. 6: Please describe the process that BellSouth undertakes to calculate the termination charges assessed a customer receiving services under a CSA in the event the customer elects to terminate the contract prior to the stated contract period.

RESPONSE:

REQUEST NO. 7: Please indicate the percentage of CSAs in effect in Tennessee that Bellsouth has assessed early termination charges during the past five years.

RESPONSE:

Respectfully submitted,

FARRIS, MATHEWS,
BRANAN & HELLEN, P.L.C.

By: Charles B. Welch, Jr.
Charles B. Welch, Jr., #5593
Attorney for Time Warner Communications
of the Mid-South, L.P. and
NewSouth Communications
511 Union Street, Suite 2400
Nashville, Tennessee 37219
(615) 726-1200

CERTIFICATE OF SERVICE

I, Charles B. Welch, Jr., hereby certify that I have served a copy of the foregoing Data Requests of Time Warner Communications of the Mid-South, L.P. and NewSouth Communications to BellSouth Telecommunications, Inc. on the parties listed below, by depositing copy of same in the U.S. Mail, postage prepaid, this the 9th day of July, 1999.

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Avenue, #1600
P.O. Box 198602
Nashville, TN 37219-8062

James Lamoureux, Esquire
AT&T
1200 Peachtree Street, NE
Atlanta, GA 30309

Carolyn Tatum Roddy, Esquire
Sprint Communications Co., L.P.
3100 Cumberland Circle, N0802
Atlanta, GA 30339

Guy M. Hicks, Esquire
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, TN 37201-3300

Jon Hastings, Esquire
Boult, Cummings, et al.
414 Union Avenue, #1600
P.O. Box 198062
Nashville, TN 37219-8062

Vance Broemel, Esquire
Consumer Advocate Division
426 5th Avenue N., 2nd Floor
Nashville, TN 37243


Charles B. Welch, Jr.