

BENNETT L. ROSS  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0793

ORIGINAL

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RECORDS AND  
REPORTING

June 1, 2000

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to AT&T's Second Request for Production of Documents, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Bennett L. Ross*  
(ml)

Bennett L. Ross

APP	_____	cc: All Parties of Record
CAF	_____	
CMP	_____ <i>Dilla</i>	Marshall M. Criser III
COM	_____	R. Douglas Lackey
CTR	_____	Nancy B. White
ECR	_____	
LEG	_____	
OPC	_____	
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06710 JUN-18

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**CERTIFICATE OF SERVICE**  
**Docket No. 990649-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Federal Express this 1st day of June, 2000 to the following:

Donna Clemons  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6216  
Fax. No. (850) 413-6217

Joseph A. McGlothlin (+)  
Vicki Gordon Kaufman \* (+)  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. For FCCA  
\*Atty. for BlueStar

Andrew O. Isar  
Telecommunications Resellers Assoc.  
4312 92<sup>nd</sup> Avenue, N.W.  
Gig Harbor, WA 98335  
Tel. No. (253) 265-3910  
Fax. No. (253) 265-3912

Tracy Hatch (+)  
AT&T Communications  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
Fax. No. (850) 425-6343

Jim Lamoureux (+)  
AT&T Communications  
1200 Peachtree Street, N.E.  
Room 8068  
Atlanta, Georgia 30309  
Tel. No. (404) 810-4196  
Fax. No. (404) 877-7648

Richard D. Melson (+)  
Gabriel E. Nieto \*  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For MCI  
Atty. for Rhythms Link  
Atty. for ACI \*

Dulaney L. O'Roark  
MCI Telecommunications Corporation  
6 Concourse Parkway  
Suite 600  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
Fax. No. (770) 284-5488

**Floyd Self**  
Norman H. Horton, Jr. •  
Messer, Caparello & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Attys. for WorldCom  
Atty. for NorthPoint •

**Terry Monroe**  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W.  
Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585

**Susan Huther**  
Rick Heapter  
MGC Communications, Inc.  
3301 Worth Buffalo Drive  
Las Vegas, Nevada 89129  
Tel. No. (702) 310-4272  
Fax. No. (702) 310-5689

**John Kerkorian (+)**  
MGC Communications  
d/b/a Mpower Communications Corp.  
Regional Vice President  
Legal & Regulatory Affairs  
Southeast Region  
5607 Glenridge Drive, Suite 310  
Atlanta, GA 30342  
Tel. No. (404) 554-1000  
Fax. No. (404) 554-0010

**Jeremy Marcus**  
Kristin Smith  
Blumenfeld & Cohen  
1625 Massachusetts Ave., Ste. 300  
Washington, D.C. 20036  
Tel. No. (202) 955-6300  
Fax. No. (202) 955-6460

**Kimberly Caswell (+)**  
GTE Florida Incorporated  
One Tampa City Center  
201 North Franklin Street  
Tampa, Florida 33602  
Tel. No. (813) 483-2617  
Fax. No. (813) 204-8870

**Peter M. Dunbar, Esq.**  
**Marc W. Dunbar, Esq.**  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
215 South Monroe Street, 2nd Flr.  
Tallahassee, Florida 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126

**Carolyn Marek (+)**  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405

**Mark E. Buechele, Esquire**  
General Counsel for Supra  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 531-5286  
Fax. No. (305) 531-5287

**Donna Canzano McNulty, Esq. (+)**  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium Bldg., Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586

**Michael A. Gross (+)**  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676

**ACI Corp.**  
7337 S. Revere Parkway  
Englewood, CO 80112  
Tel. No. (303) 476-4200  
Fax. No. (303) 476-4201

**Florida Public Telecomm. Assoc.**  
Angela Green, General Counsel  
125 South Gadsden Street  
#200  
Tallahassee, FL 32301-1525  
Tel. No. (850) 222-5050  
Fax. No. (850) 222-1355

**Intermedia Communications, Inc.**  
Scott Sapperstein (+)  
Sr. Policy Counsel  
3625 Queen Palm Drive  
Tampa, FL 33619-1309  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923

**TCG South Florida**  
c/o Rutledge Law Firm  
Kenneth Hoffman  
215 South Monroe Street, Ste. 420  
Tallahassee, FL 32301  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515

**Time Warner AxS of FL, L.P.**  
2301 Lucien Way  
Suite 300  
Maitland, FL 32751  
Represented by Pennington Law Firm

**Glenn Harris, Esq.**  
NorthPoint Communications, Inc.  
222 Sutter Street  
7th Floor  
San Francisco, CA 94108  
Tel. No. (415) 365-6095  
Fax. No. (415) 403-4004  
Email Fax. (503) 961-1314

**Charles J. Rehwinkel (+)**  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
Counsel for Sprint

**John P. Fons (+)**  
Ausley & McMullen  
Washington Square Building  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 224-9115  
Fax. No. (850) 222-7560  
Counsel for Sprint

**Brian Sulmonetti**  
MCI WorldCom, Inc.  
6 Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5500

**Catherine F. Boone, Esq. (+)**  
Regional Counsel  
Covad Communications Company  
10 Glenlake Parkway  
Suite 650  
Atlanta, GA 30328-3495  
Tel. No. (678) 579-8388  
Fax. No. (678) 320-9433

**Charles J. Beck**  
Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Tel. No. (850) 488-9330  
Fax. No. (850) 488-4491

**Eric J. Branfman (+)**  
**Morton J. Posner (+)**  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7500  
Fax. No. (202) 424-7645  
Represents Florida Digital Network, Inc.  
Represents KMC, KMC II & KMC III

**John McLaughlin**  
KMC Telecom. Inc.  
Suite 170  
3025 Breckinridge Boulevard  
Duluth, GA 30096  
Tel. No. (770) 931-5260  
Fax. No. (770) 638-6796

**Bettye Willis (+)**  
ALLTEL Communications  
Services, Inc.  
One Allied Drive  
Little Rock, AR 72203-2177

**J. Jeffrey Wahlen (+)**  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
Atty. for ALLTEL

**Stephen P. Bowen**  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
Tel. No. (415) 394-7500  
Fax. No. (415) 394-7505

**Norton Cutler (+)**  
General Counsel  
BlueStar Networks, Inc.  
401 Church Street  
24th Floor  
Nashville, Tennessee 37201  
Tel. No. (615) 346-3848

**Michael Bressman (+)**  
Associate General Counsel  
401 Church Street  
24th Floor  
Nashville, Tennessee 37201  
Tel. No. (615) 346-6660

**Patrick K. Wiggins**  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard, Suite 200  
Tallahassee, FL 32303

**George S. Ford (+)**  
Chief Economist  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, FL 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
gford@z-tel.com

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19th Street, NW, Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
jacanis@kelleydrye.com  
mhazzard@kelleydrye.com  
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce  
Shook, Hardy & Bacon, LLP  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
rjoyce@shb.com  
Represents Network Access Solutions

Jon C. Moyle, Jr., Esq.  
Cathy M. Sellers, Esq.  
Moyle, Flanigan, Katz, Kolins,  
Raymond & Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
Attys. for Global NAPs  
jmoylejr@moylelaw.com  
csellers@moylelaw.com

Russell M. Blau  
Marc B. Rothschild  
Swidler Berlin Shereff Friedman  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007-5116  
Tel. No. (202) 424-7755  
Fax. No. (202) 424-7643  
Attys. for Broadslate Networks, Inc.  
Attys. for @link Network, Inc.

John Spilman  
Director Regulatory Affairs and  
Industry Relations  
Broadslate Networks, Inc.  
675 Peter Jefferson Parkway  
Suite 310  
Charlottesville, VA 22911  
Tel. No. (804) 220-7606  
Fax. No. (804) 220-7701

Constance L. Kirkendall  
Regulatory Manager  
@link Network, Inc.  
2220 Campbell Creek Blvd.  
Suite 110  
Richardson, TX 75082-4420  
Tel. No. (972) 367-1700  
Fax. No. (972) 367-1775

  
Bennett L. Ross 

**(+) Signed Protective Agreement**

ORIGINAL

In re: Investigation into )  
Pricing of Unbundled Network )  
Elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 1, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**RESPONSES TO AT&T'S SECOND REQUEST**  
**FOR PRODUCTION OF DOCUMENTS**

**GENERAL OBJECTIONS**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") asserts the following general objections to the Second Request for Production of Documents served by AT&T Communications of the Southern States, Inc. ("AT&T") on May 12, 2000.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted AT&T's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

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4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by BellSouth in response to AT&T's requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T, consistent with applicable law, subject to any other general or specific objections contained herein.



10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, BellSouth's responses will provide, subject to any applicable objections, all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with these requests. BellSouth shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense. To the extent that AT&T requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, BellSouth incorporates herein by reference its objections to that previous discovery.

### **REQUESTS FOR PRODUCTION**

Subject to the General Objections stated herein, BellSouth provides the following responses to AT&T's Second Request for Production:

**Request No. 22:** Please provide copy of the latest earnings or surveillance report filed with Florida Public Service Commission.

**Response:** Documents responsive to this request are being produced.

**Request No. 23:** Please provide all relevant documentation to support BellSouth's response to AT&T's Second Interrogatory No. 73.

**Response:** Since the Florida Public Service Commission no longer prescribes depreciation parameters for intrastate booking purposes, as explained in BellSouth's response to AT&T Interrogatory Item No. 73, there is no relevant documentation to provide.

**Request No. 24:** Please provide copies of 1990-1999 ARMIS 43-07 reports for Florida.

**Response:** Documents responsive to this request are being produced.

**Request No. 25:** Please provide a copy of latest "Average Life Indications Based on Full Mortality Study" for each account.

**Response:** Documents responsive to this request are being produced.

**Request No. 26:** Regarding SCIS/MO Inputs, please provide all supporting documentation, analyses for the CCS per ISDN BRI. Include all customer usage and engineering assumptions made to support this input.

**Response:** For Business customers: 4 CSV\* calls @ 1.50 CCS/call and 1 CSD\*\* call @ 12.00 CCS/call

For Residential customers: 2 CSV calls @ 1.50 CCS/call and 1 CSD call @ 12.00 CCS/call

\* CSV = Circuit Switched Voice

\*\* CSD = Circuit Switched Data

These recommendations are per Circuit Switched B channel. These items were then weighted using the 1996 ISDN channel forecast to determine the average B channel Circuit Switched load per BRI.

No further documentation is available.

**Request No. 27:** Please provide the different processor realtimes from SCIS/IN for the three features mentioned and provide the precise switch resources and algorithm used for each of the three features in SST as referenced on page 13, lines 9-17 of Mr. Page's May 1, 2000 Direct Testimony.

**Response:** The processor realtimes for these and all other SCIS/IN switch features are available from the SCIS/IN Realtime Tables. These Realtime Tables are part of the Telcordia™ Switching Cost Information System "SCIS/MO and SCIS/IN for BellSouth" Release 2.6.1 CD-ROM, which has already been served to AT&T in this proceeding. The referenced CD is proprietary and was provided subject to the nondisclosure agreement executed by AT&T.

The "precise switch resources and algorithms" used for features in SST© may be examined by looking at the SST-U© model, "UNE Main" worksheet, columns CA through DK. See following the Excel workbook, located on the proprietary CD-ROM provided in BellSouth's April 17, 2000 Cost Study Filing in this proceeding: Data\Florida Docket 990649-TP\State Average\Invstmts\F1St\_SST\_U.xls. The referenced CD is proprietary and was provided subject to the nondisclosure agreement executed by AT&T.

Further information on the switch resources used by features and the rationale for the SST© switch feature categories is provided in Section 8 of the SST© Model Study Methodology document. See the following section of the non-proprietary CD-ROM provided in BellSouth's April 17, 2000 Cost Study Filing in this proceeding: Documentation\Xappendix\ Appendix D\ SST\_METH.doc.

Simplified Switching Tool -  
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**Request No. 28:** Please provide all analyses and comparisons BellSouth made between results produced by SCIS/IN and SST as referenced on page 16, lines 3-8 of Mr. Page's May 1, 2000 Direct Testimony.

**Response:** BellSouth has not performed the analyses or comparisons requested. Mr. Page's conclusions regarding the potential results produced by SCIS/IN and the SST© are based upon his understanding of the models' algorithms.

**Request No. 29:** Please provide the documentation for the utilization factor for each hardware equipment component as referenced on page 28, lines 4-23 of Mr. Page's May 1, 2000 Direct Testimony.

**Response:** BellSouth does not have the documentation requested. The 85% utilization factor is a conservative assumption chosen to be consistent with the objective utilization represented by BellSouth's input to SCIS/MO for trunk CCS per circuit. That input, at 29 CCS per trunk, represents an approximately 80% utilization.

**Request No. 30:** Please provide the actual orders and actual billing account records for the replacement offices used to derive the discount and provide all documents, spreadsheets, used to develop the melded discount referenced on page 23, lines 9-24 of Mr. Page's May 1, 2000 Direct Testimony.

**Response:** The requested information contains vendor proprietary information and is voluminous. It will be provided at a BellSouth location and available for viewing by AT&T subject to the provisions of the executed nondisclosure agreement.

The information consists of:

Paper copies of the actual orders along with the SCIS/MO input sheets.

- Extracts from BCAS that shows the vendor billing summary for material, engineering and installation (electronic files JIMLOW1.xls and JIMLOW2.xls).
- Melded discount calculations are contained in electronic file DISCMELD.xls.
- Electronic file JL10.xls contains line data used in the DISCMELD.xls file for weighting.
- Electronic files DISC5ESS.xls and DISCDMS.xls contain the summary sheets used to calculate the "target" discounts.

**Request No. 31:** In regards to page 26, lines 21-23 of Mr. Page's May 2, 2000 Direct Testimony, please provide the switch vendor's processor engineering tool used to support BellSouth's conclusion that each feature use generates approximately the same

processor realtime as a call setup and provide all documents supporting the examination and analysis used by BellSouth to support the claim that “each use of a feature generates approximately the same processor realtime as a call setup.”

**Response:** The question misrepresents Mr. Page's testimony. Lines 21-23, page 26, of Mr. Page's testimony clearly state that the conclusion that each use of a feature generates approximately the same realtime usage as a call setup is supported by examination of the call timings within SCIS/TN.

However, regarding the "switch vendor's processor engineering tool," BellSouth is not at liberty to provide this tool because it is owned by NORTEL Networks, Inc. and is Trade Secret information of NORTEL. BellSouth utilizes this tool by remote access to a NORTEL location. It is BellSouth's understanding that, as a NORTEL customer, AT&T can also access this tool.

However, BellSouth previously provided the inputs and results of the processor engineering tool runs examined by BellSouth. See BellSouth's response to Item No. 14m of AT&T's first Request for Production of Documents in this Docket, dated May 2, 2000.

**Request No. 32:** In regards to page 27, lines 14-24 of Mr. Page's Direct Testimony:

- a) Please provide all source documents that underlie the feature inputs into BellSouth's retail studies.
- b) Please provide the matrix used to develop the average call demand by type of switch resource.
- c) Please provide complete documentation of the statement that “the typical end user customer utilizes 4 vertical features from an extensive list.”

**Response:** a) The feature inputs in question were compiled from several BellSouth retail cost studies and reflect the results of numerous Network data requests spanning a number of years. Because of the volume of documents involved, BellSouth is willing to make available for AT&T's review source documents pertaining to specific feature data inputs which AT&T may be interested.

b) The matrix has been previously provided in response to AT&T's 1<sup>st</sup> Production of Documents in this Docket, item 14(l). That list clearly indicates, for each feature, the quantity of busy hour usage generated by that feature in each feature investment category, i.e., Processor, Line, Hardware, or SS7.

c) This data was obtained by a BellSouth Product Management study of BellSouth's Complete Choice™ retail product. This study is provided in Attachment No. 1. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.

**Request No. 33:** Regarding STT-Usage Study WP10 Inputs:

a) “% of all lines Using at least one CLASS Modem Feature” - Please provide all documentation, analysis for this input value

b) “% of all lines with Remote Call Forwarding” - Please provide all documentation, analysis for this input value.

**Response:** a) Attachment No. 1 provides the data requested. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.

b) This input value (0.4%) was computed as follows:

<b>Item</b>	<b>Description</b>	<b>Value</b>
A	Number of Lines with Remote Call Forwarding per Central Office	65
B	Average Number of Lines per Office	16,191
C	Percent of All Lines With Remote Call Forwarding (A / B)	0.4%

Item A was obtained from a BellSouth Number Portability cost study performed in 1996. Attachment No. 2 provides the relevant cost study documentation. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T. Item B is included in the response to POD Item No. 33a above.

**Request No. 34:** Please provide all tables and schedules ordinarily required by the FCC in a Depreciation Study.

**Response:** BellSouth has not filed a depreciation study with the FCC for Florida since 1995. All tables and schedules relevant to determining depreciation parameters used in BellSouth's Cost Study filed in this proceeding are included in the 2000 Florida Depreciation Study, which is attached to the direct testimony of David Cunningham. No other tables or schedules were produced.

**Request No. 35:** Please provide all electronic transfer data to prepare a complete Florida Depreciation Study as of January 1, 2000.

**Response:** No electronic transfer data was generated for the 2000 Florida Depreciation Study.

**Request No. 36:** Provide "worm charts" for each account plotting the life indications consistent with FCC banding requirements.

**Response:** Any "worm charts" that were produced for the 2000 Florida Depreciation Study are included in the study, which is attached to the direct testimony of David Cunningham.

**Request No. 37:** Provide all substitution and life cycle analyses prepared in support of the Depreciation Study.

**Response:** This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.

**Request No. 38:** Provide all company plans underlying the Depreciation Study.

**Response:** All relevant company planning information underlying the 2000 Florida Depreciation Study included in the study, which is attached to the direct testimony of David Cunningham.

**Request No. 39:** Please provide the records relating to the company's tracking of cable pair displacement as discussed on pages 012 to 013 of the Depreciation Study.

**Response:** See response to AT&T's 2<sup>nd</sup> Request for Production of Documents #37.

**Request No. 40:** Please provide any studies available comparing BellSouth Florida's provision of advanced services to any other LECs' provision of advanced services.

**Response:** BellSouth is unaware of any responsive documents.

**Request No. 41:** Provide actual company plans supporting the AYFR for computers.

**Response:** See page 128 of the 2000 Florida Depreciation Study, which is attached to the direct testimony of David Cunningham.

**Request No. 42:** Please provide the underlying data, and the calculations of the figures shown on the following pages of the Depreciation Study: 150, 151, 152, 153, 196, 197, 198, 199, 200, 272, 273, 275, 276, 278, 279.

**Response:** See response to AT&T's 2<sup>nd</sup> Request for Production of Documents #37.

**Request No. 43:** Please provide a copy of the Company's most recent Business Plan and/or underlying workpapers identifying the projected investment additions and retirements in Florida by depreciable plant account or category for the years 2000 to 2004.



**Response:** The projected investment additions and retirements in Florida by depreciable plant account or category for the years 2000 to 2002 are provided in Attachment No. 1. Projected investment additions and retirements for the years 2003-2004 were not utilized in BellSouth's filing; and therefore, are not being furnished with these responses.

**Request No. 44:** Please provide all supporting workpapers, memoranda or other documents in relation to AT&T's Second Interrogatory No. 105.

**Response:** Documents responsive to this request are being provided.

**Request No. 45:** If the information requested in AT&T Second Interrogatory No. 110 has not been provided, please provide in the same file layout as the Curr~Book Cost worksheet.

**Response:** See response to Interrogatory Item No. 110.

**Request No. 46:** If the information requested in AT&T Second Interrogatory No. 111 has not been provided, please provide in the same file layout as the Curr~Book Cost worksheet.

**Response:** See response to Interrogatory Item No. 111.

**Request No. 47:** Worksheets 1999 Additions, 2000 Additions, 2001 Additions and 2002 Additions contained on file INVPRJ00.xls of appendix f provides BellSouth's projected Net additions for the investment accounts listed on this file. Please provide in electronic format and the same file layout as INVPRJ00.xls, worksheets 1999 Additions, 2000 Additions, 2001 Additions and 2002 Additions, the projected gross additions for the investment accounts listed on INVPRJ00.xls for the years 1999, 2000, 2001 and 2002.

**Response:** Projected gross additions are provided in Attachment No. 1 (file POD47-ATT1.XLS).

**Request No. 48:** Please provide a copy of the FCC quote shown on Page 8, Lines 9-11 of Ms. Caldwell's May 1, 2000 Direct Testimony, as well as a reference to its exact location.


**Response:** BellSouth does not understand AT&T's page and line reference. The lines referenced read as follows:


**Q. WHAT METHODOLOGY DID BELLSOUTH USE TO DEVELOP THE COSTS OF COMBINATIONS?**

Obviously, there is no quotation contained in these lines. Thus, no answer can be provided.

Respectfully submitted this 1st day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE  
MICHAEL P. GOGGIN (for)  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5555

  
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BENNETT L. ROSS  
E. EARL EDENFIELD, JR.  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0793

214776