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BellSouth Telecommunications, Inc. FL Dkt. No. 041269-TP Staff's 3rd Set of Interrogatories September 30, 2005 Item No. 84 Page 1 of 2 PUBLIC

- REQUEST: Please refer to the rebuttal testimony of CompSouth witness Joseph Gillan, page 25, lines 8 through 22, where he discusses the pending merger between SBC and AT&T.
 - a. Has BellSouth counted SBC and AT&T as individual fiber-based collocators in performing its impairment analyses?
 - b. If your response to (a) is yes, in which wire centers in Florida are both SBC and AT&T collocated?
 - c. For those wire centers listed in response to (b), list any wire centers in Florida that currently meet the criteria for non-impairment that would fail under the criteria for impairment if SBC and AT&T were not counted separately.
- RESPONSE: a. Yes. As of the effective date of the TRRO's competitive thresholds, March 11, 2005, AT&T and SBC were operating as two separate business entities and thus should be counted as two separate fiber-based collocators.



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BellSouth Telecommunications, Inc. FL Dkt. No. 041269-TP Staff's 3rd Set of Interrogatories September 30, 2005 Item No. 84 Page 2 of 2 PUBLIC

RESPONSE:(Cont.)

c. BellSouth interprets "fail" to mean that an office that is unimpaired in some fashion becomes impaired. With this qualification, no offices would "fail" or become impaired. However, BellSouth has designated the following offices as Tier 1 transport offices, and if AT&T and SBC were not counted separately, these offices would become Tier 2 transport offices *** BEGIN CONFIDENTIAL ***

*** END CONFIDENTIAL ***

Pam Tipton

RESPONSE PROVIDED BY:

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BellSouth Telecommunications, Inc. FL Dkt. No. 041269-TP Staff's 3rd Request for Production September 30, 2005 Item No. 7 ATTACHMENT

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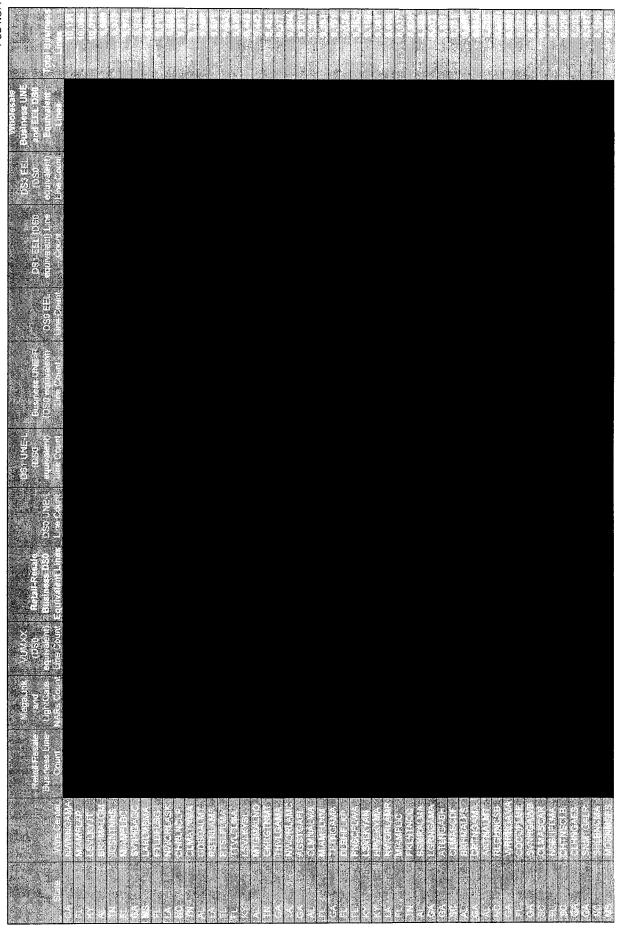
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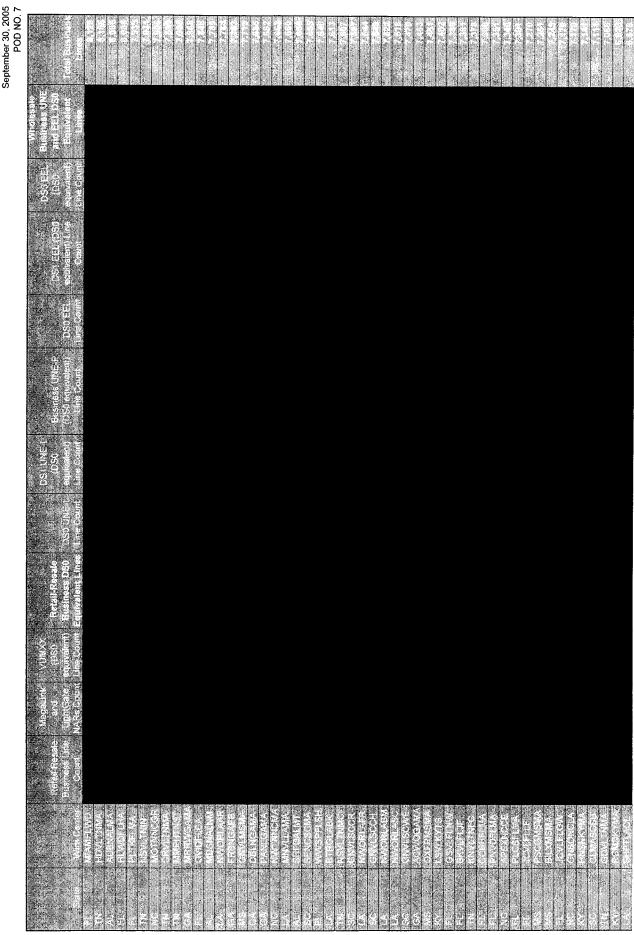
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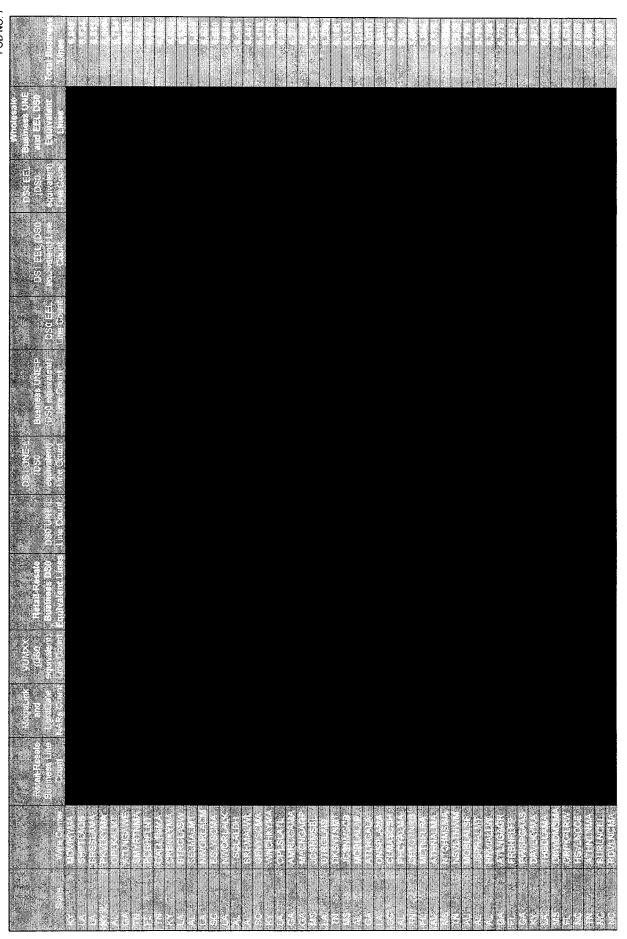
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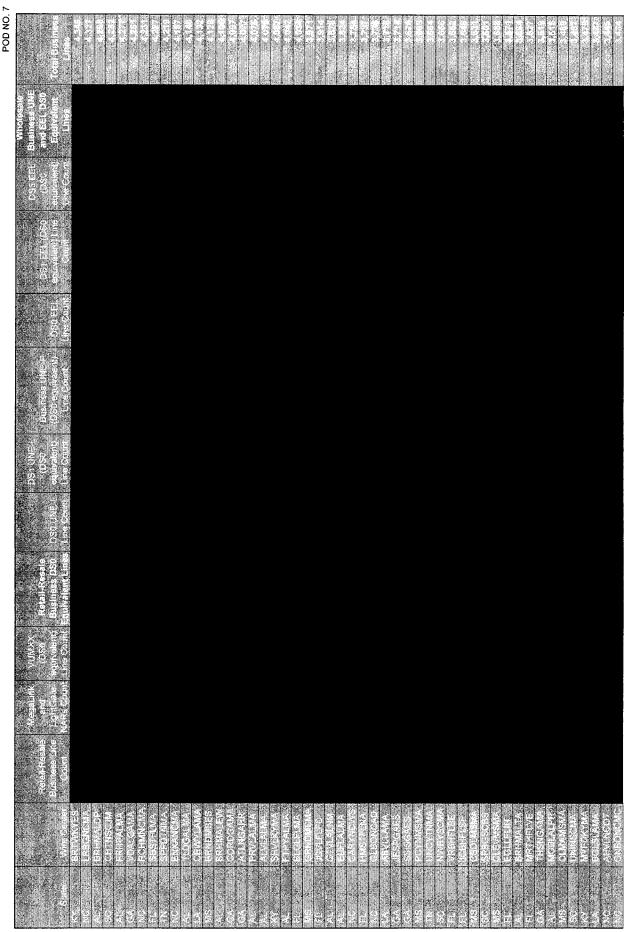
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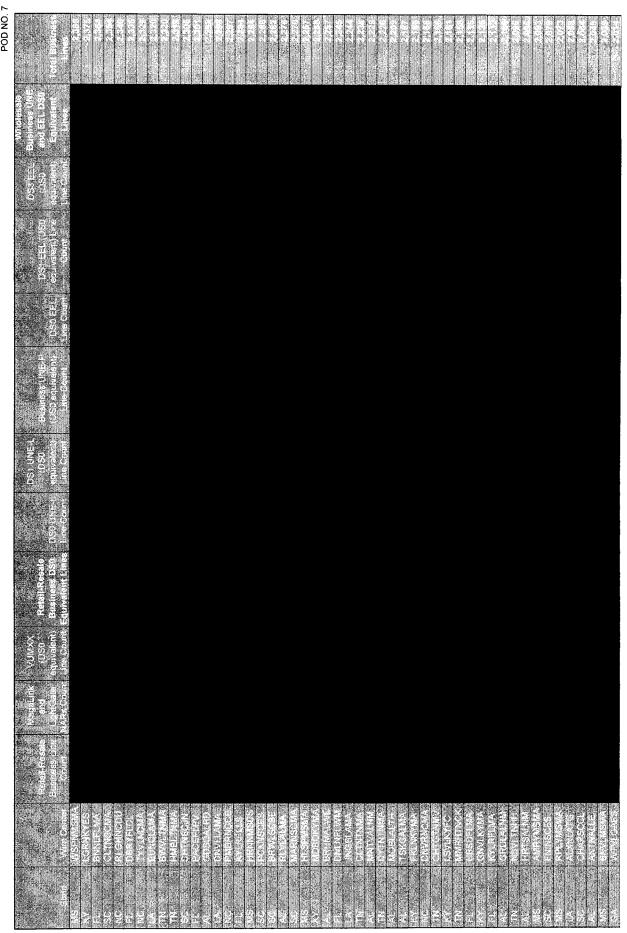
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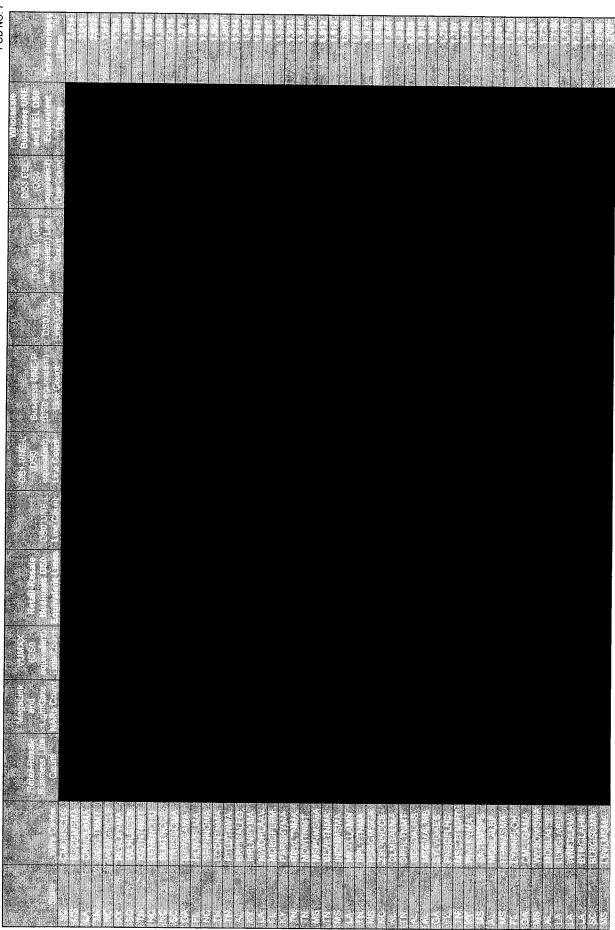
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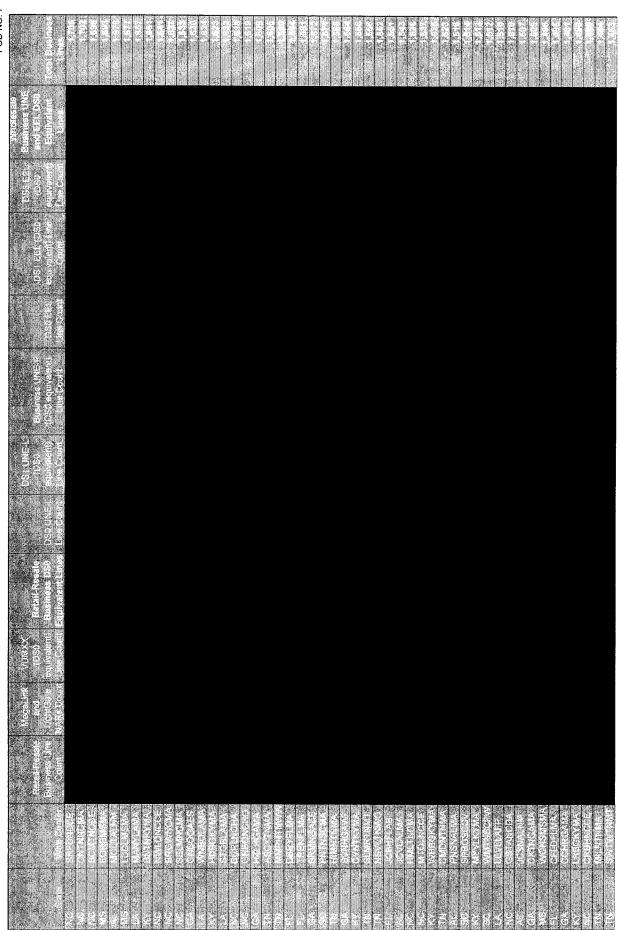
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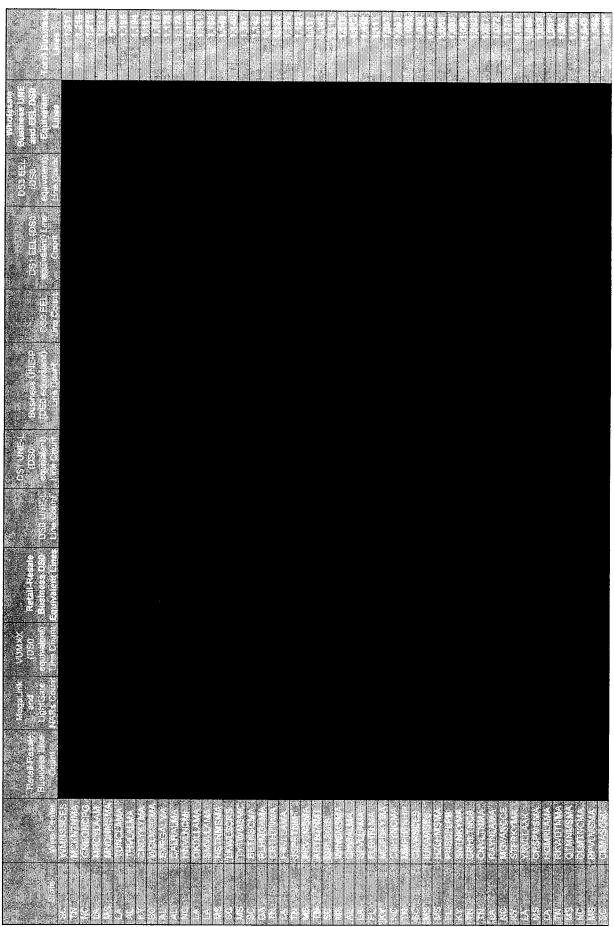
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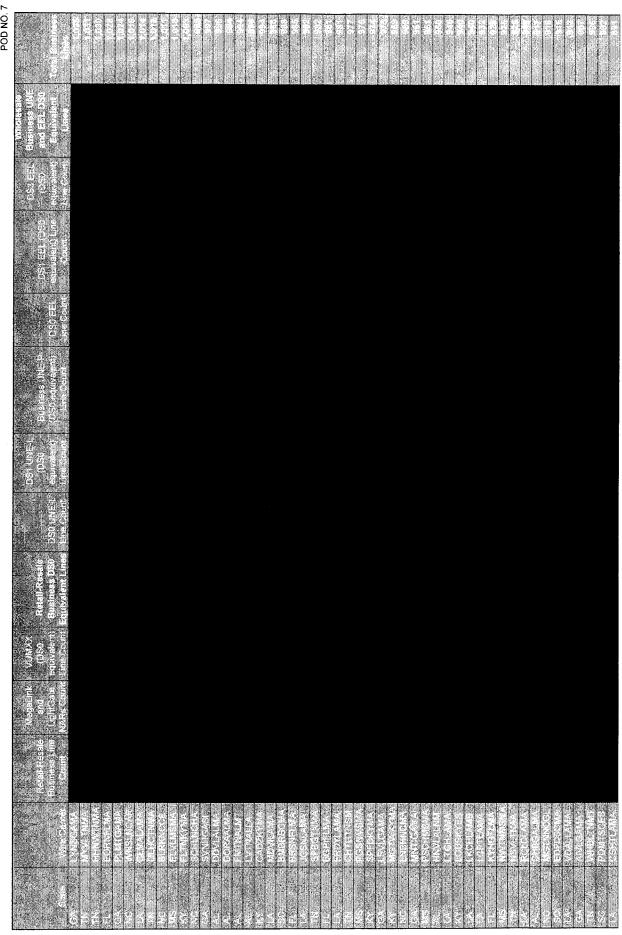




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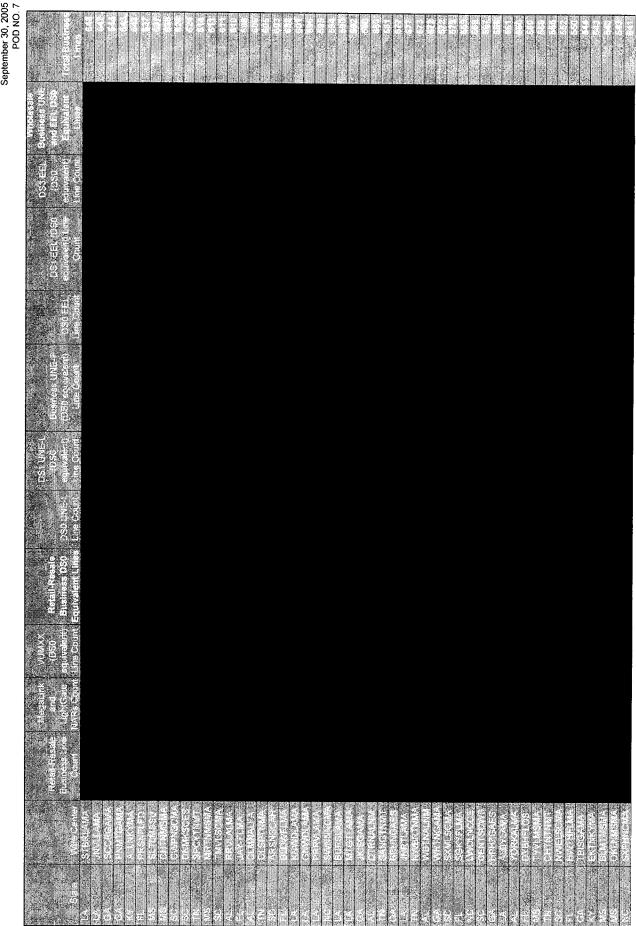
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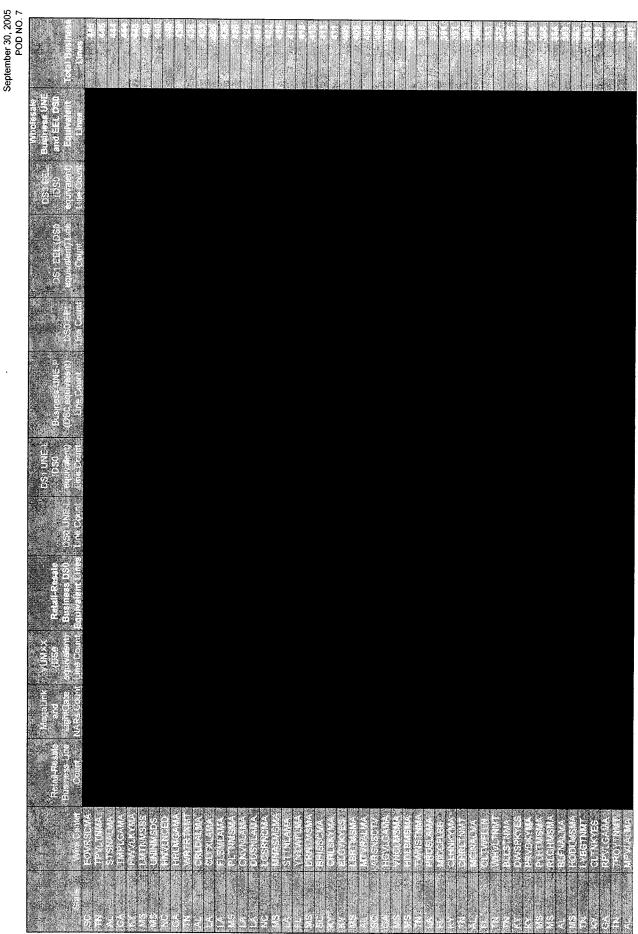
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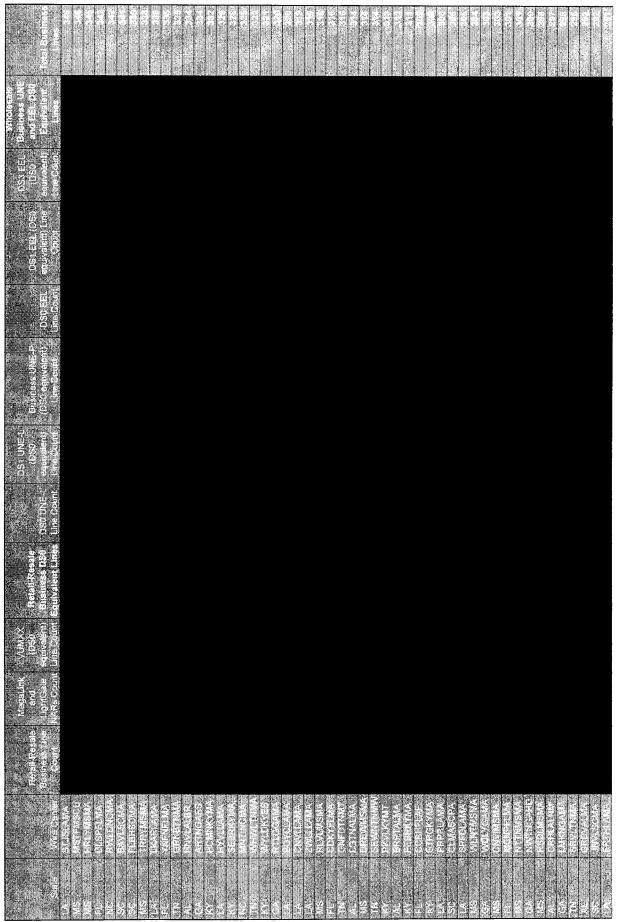
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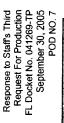


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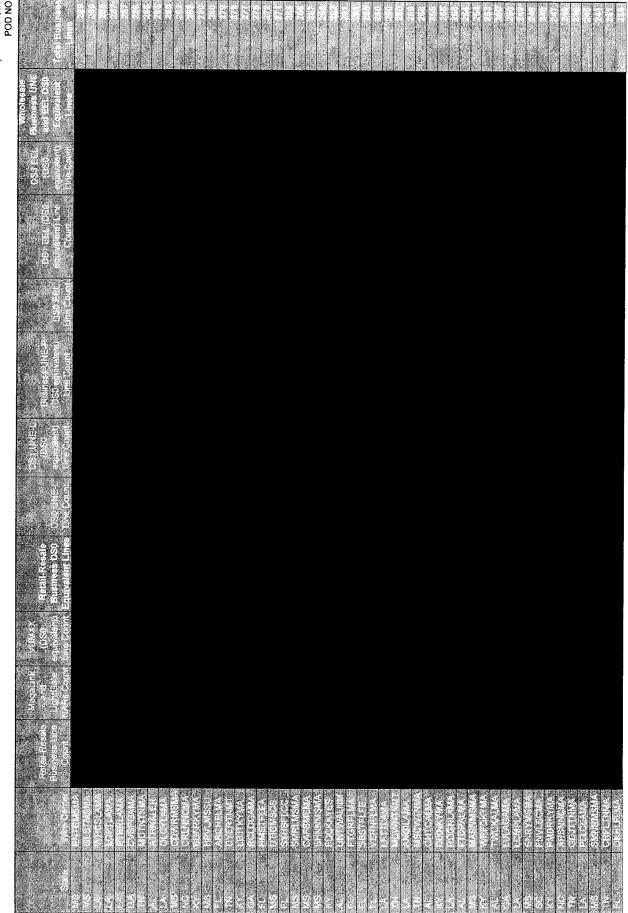






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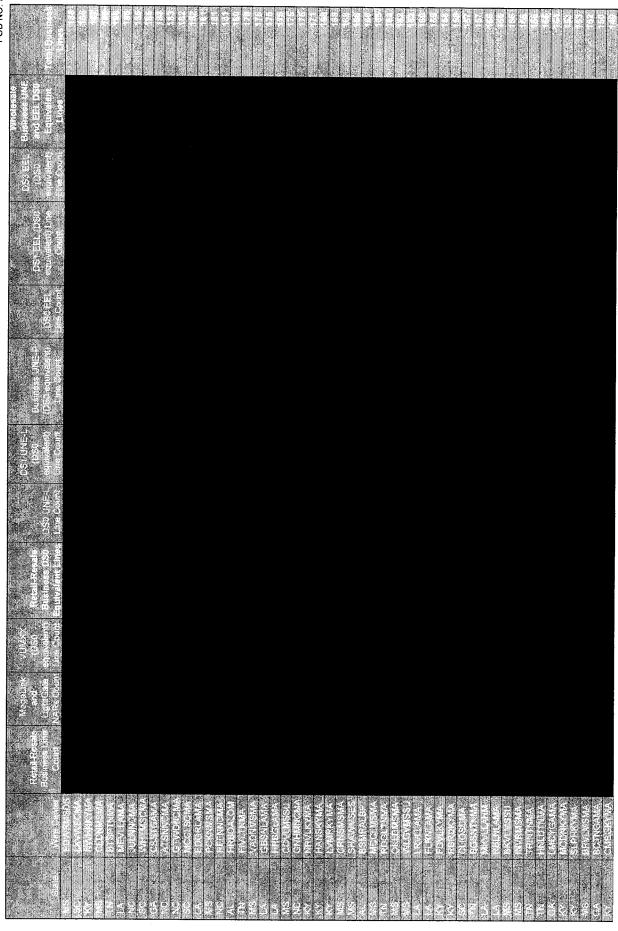
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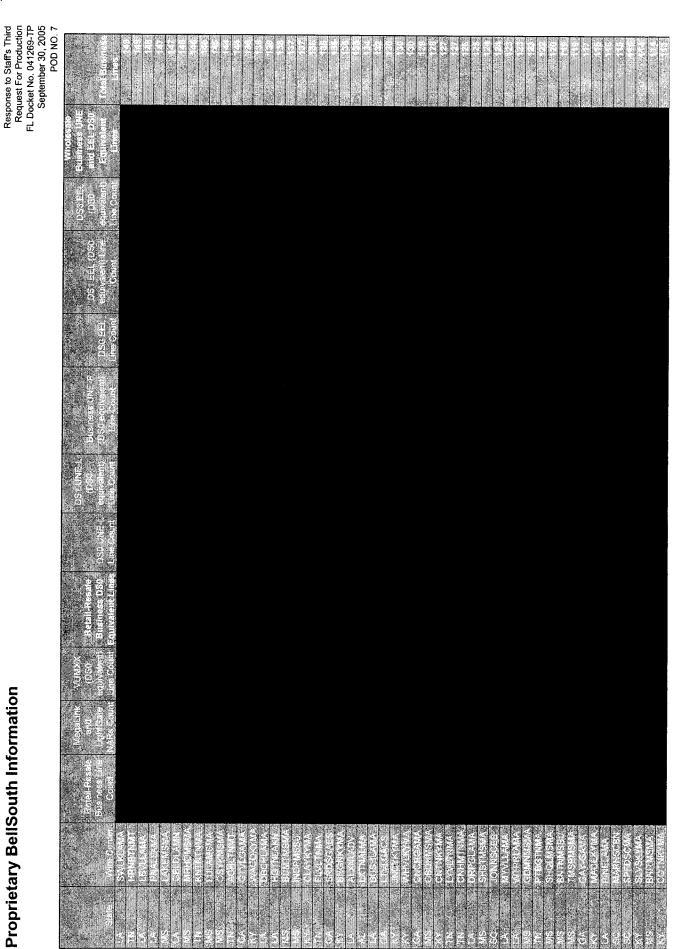
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