

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of: )

Petition by ICG TELECOM GROUP, INC. )  
for Arbitration of an Interconnection )  
Agreement with BELLSOUTH )  
TELECOMMUNICATIONS, INC. Pursuant to )  
Section 252(b) of the Telecommunication )  
Act of 1996 )

Docket No. 990691-TP

Filed: September 20, 1999

ICG TELECOM GROUP, INC.'S  
ANSWERS  
BELLSOUTH TELECOMMUNICATIONS, INC.'S

**DECLASSIFIED** *ALL 6-14-01*  
CONFIDENTIAL  
**PROPRIETARY**

DOCUMENT NUMBER-DATE

11268 SEP 20 99

FPSC-RECORDS/REPORTING

**INTERROGATORY:** Identify all states in which ICG has requested an Incumbent Local Exchange Carrier (other than BellSouth) to provide ICG with volume and term discounts on unbundled network elements consistent with those available for the Incumbent's special access services. In answering this Interrogatory, please:

- (a) identify each Incumbent Local Exchange Carrier to whom such a request was made;
- (b) state the date of ICG's request and the date of the Incumbent Local Exchange Carrier's response; and
- (c) describe with particularity the Incumbent Local Exchange Carrier's response to ICG's request, including the discounts to which the incumbent agreed, if any.

**RESPONSE:**

- (a) ICG has requested volume and term discounts on unbundled network elements from BellSouth (Alabama, North Carolina, Florida, Georgia, Tennessee and Kentucky) Pacific Bell (California) and Ameritech (Ohio).
- (b) May 1999 for BellSouth, August 1999 for Pacific Bell and June 1999 for Ameritech.
- (c) The ILEC is negotiating with ICG.

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**INTERROGATORY:** Identify all states in which ICG is providing local exchange service and identify the number of access lines being served by ICG in each such state.

<b>RESPONSE:</b>	<u>STATE</u>	<u>ACCESS LINES</u>
	Alabama	14,475
	Georgia	10,841
	North Carolina	16,701
	Tennessee	9,607
	Kentucky	12,189
	Florida	0
	Texas	19,502
	Colorado	65,161
	California	154,651
	Ohio	127,970

As of June 1999.

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**INTERROGATORY:** Are there any types of frame relay elements necessary to provide packet-switched services that you have requested from BellSouth that you contend BellSouth has refused to provide on an unbundled basis? If the answer is in the affirmative:

- (a) identify with particularity the type of element you requested which BellSouth allegedly has refused to provide;
- (b) state the date when you first requested the element and the date BellSouth allegedly refused to provide it;
- (c) state the reasons purportedly given by BellSouth for its refusal to provide the element; and
- (d) identify all documents that refer or relate to ICG's request for or BellSouth's refusal to provide each such element.

**RESPONSE:** As the question applies to service orders, the answer is none. As the question applies to service negotiations between ICG and BellSouth the answer is as follows:

- (a) Network-to-network interface, network-to-end user interface, data control links and related transmission speeds.
- (b) May 1999.
- (c) and (d) The information and documents requested are in the possession of BellSouth.

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