

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS	)	
COMMISSION'S TRIENNIAL REVIEW ORDER	)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS	)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS	)	

**CINCINNATI BELL TELEPHONE COMPANY'S RESPONSE TO  
BELLSOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES**

**General Information**

Cincinnati Bell Telephone Company ("CBT") hereby responds to BellSouth's Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories. Because CBT does not currently provide qualifying service in Kentucky, CBT's responses are limited to its provision of non-qualifying service within its traditional operating area. For purposes of CBT's responses, CBT assumes that customers purchasing 3 DS0 or fewer lines are considered mass market customers; customers purchasing 4 DS0 or more lines, and all higher levels (DS1 and above), are considered enterprise customers and the corresponding lines are considered enterprise lines. Moreover, CBT wishes to note that it is not challenging the Federal Communications Commission's ("FCC") presumption of impairment with respect to mass market switching, loops or transport in its Kentucky operating territory. For this reason, CBT does not believe that some of the information sought from CBT is relevant to the Commission's impairment analysis with respect to BellSouth's operating area.

**Responses to Interrogatories**

- 1) Identify each switch owned by Company that Company uses to provide a qualifying service anywhere in Kentucky, 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 DMS 100);
  - (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:**

n/a

- 3) Identify any other switch not previously identified in Interrogatory No. 1 that Company uses to provide a qualifying service anywhere in Kentucky, 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 Company 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 Common Language Location Identifier ("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 DMS 100);
  - (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 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:**

n/a

- 5) Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky 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:**

n/a

- 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:**

n/a

- 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) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voicegrade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voicegrade 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:**

n/a

- 8) Identify by name, address, and CLLI code, each ILEC wire center area, e.g., (Louisville, 526 Armory Place, LSVLKYAP), in which you provide qualifying service to any end user customers in Kentucky 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:**

n/a

- 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:**

n/a

- 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) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voicegrade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voicegrade 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:**

n/a

- 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 service to any end user customers in Kentucky 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:**

None

- 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:**

n/a

- 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) voicegrade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voicegrade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voicegrade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voicegrade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voicegrade 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:**

n/a

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 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 DMS 100);
- (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 all documents referring or relating to the rates, terms, and conditions of Company'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:**

There are no business cases of this nature that apply in any way to the operations of CBT within the state of Kentucky.

- 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:**

No such documentation exists. In the late 1990s, CBT entered into an exploratory discussion with another entity to evaluate service entry in other areas, including Kentucky. This relationship was not pursued and all documents relative to these discussions were destroyed in accordance with the terms of a non-disclosure agreement entered into by the parties.

- 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:**

No such documents exist with respect to Kentucky.

- 18) Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Kentucky? If the answer to this Interrogatory is in the affirmative, 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 DMS 100);
- (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 Kentucky.

**Response:**

Only four of CBT's switches (CBT's 5ESS switches) would be capable of providing qualifying service in Kentucky. Although CBT has six (6) DMS10 switches in Kentucky, CBT believes



that they are too restrictive for use in providing qualifying services. The capacity and number of lines in service are for the host switch only.

1.
  - a) CVTNKYCNDS0 (Covington)
  - b) 111 East 11<sup>th</sup> St.  
Covington, KY 41011
  - c) Lucent Technologies 5ESS
  - d) [Redacted]
  - e) [Redacted]
  - f) No such documents exist.
  
2.
  - a) FLRNKYFLDS1 (Florence)
  - b) 15 Girard St.  
Florence, KY 41042
  - c) Lucent Technologies 5ESS
  - d) [Redacted]
  - e) [Redacted]
  - f) No such documents exist.
  
3.
  - a) FTTHKYFTDS0 (Ft. Thomas)
  - b) 947 S. Ft. Thomas Ave  
Ft. Thomas, KY 41075
  - c) Lucent Technologies 5ESS
  - d) [Redacted]
  - e) [Redacted]
  - f) No such documents exist.
  
4.
  - a) LKPKKYL PDS0 (Lakeside Park)
  - b) 2611 Dixie Highway (US25)  
Lakeside Park, KY 41017
  - c) Lucent Technologies 5ESS
  - d) [Redacted]
  - e) [Redacted]
  - f) No such documents exist.

19) Identify each MSA in Kentucky 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:**

None

- 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:**

n/a

- 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:**

n/a

- 22) Identify each MSA in Kentucky 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:**

Cincinnati MSA

- 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:**

n/a

- 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 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:**

See CBT's Exchange Rate Tariff and General Exchange Tariff on file at the Commission's offices or available at <http://www.cincinnati-bell.com/corporate/>.

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

**Response:**

None

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

**Response:**

n/a

- 27) For those end user customers to whom you only provide qualifying service in the State of Kentucky, please state the average number of lines that you provide each such end user customer.

**Response:**

n/a

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

**Response:**

CBT provided non-qualifying service to 162,918 end users in the State of Kentucky as of June 30, 2003. This figure is based upon the total number of billed telephone numbers ("BTNs") with a Kentucky area code.

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

**Response:**

[Redacted] is the average monthly regulated revenues received from end users for the period January 1, 2003 through June 30, 2003.

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

**Response:**

None

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

**Response:**

None

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

**Response:**

None

- 33) Please provide a breakdown of the total number of end user customers served by Company in Kentucky 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:**

Counts provided are as of June 30, 2003.

<u>Classification</u>	<u>Definition</u>	<u>Count</u>
Consumer	Residential	142,827
Business	Non-Residential	20,091

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:**

CBT does not calculate average acquisition costs for customers in its traditional operating territory. CBT does not currently provide service to customers outside of its traditional operating territory in Kentucky and, therefore, does not have such calculations with respect to out-of-territory customers.

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:**

CBT does not calculate typical churn rates for customers in its traditional operating territory. CBT does not currently provide service to customers outside of its traditional operating territory in Kentucky and, therefore, does not have such calculations with respect to out-of-territory customers.

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:**

CBT does not currently provide service to customers outside of its traditional operating territory in Kentucky. CBT believes that information relative to its in-territory service is irrelevant for purposes of the Commission analysis of BellSouth's markets.

- 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 Kentucky.

**Response:**

See the response to No. 36 above.

- 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 Kentucky.

**Response:**

See the response to No. 36 above.

- 39) Describe how the marketing organization that is responsible for marketing qualifying service in Kentucky 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 representatives in your marketing efforts in Kentucky, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

**Response:**

n/a

- 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:**

[Redacted]

- 41) Is there a typical or average number of DS0s at which you would chose 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:**

[Redacted]

- 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, a digital PBX, or a digital Key System, 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, the PBX, or the Key System, or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

**Response:**

In order to provide the customer that currently receives service via multiple DS0s with the same functionality using a DS1 circuit, CBT would install a 1/0 Multiplexer ("MUX") at a cost of approximately \$6900 for 1 DS1 with 24 DS0 output capacity. If the customer purchased multiple DS1s, the cost of the MUX could be as low as \$2550 per DS1.

- 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:**

n/a. CBT does not offer qualifying service in Kentucky.

- 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:**

See response to No. 43 above.

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

**Response:**

See response to No. 43 above.

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

**Response:**

See response to No. 43 above. CBT defines sales expense as that expense associated with the acquisition and/or retention of customers. It includes direct sales expense, promotion and advertising, and order processing.

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:**

See response to No. 43 above.

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

**Response:**

General and Administrative costs are usually considered those costs that are not a direct component of any cost-of-product-sold. An example of this indirect operating expense would be ongoing Information Technology maintenance.

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:**

See response to No. 43 above.



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

**Response:**

None

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

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Company, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether Company complained in writing to BellSouth or anyone else.

**Response:**

n/a

52) Does Company 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

CBT has insufficient knowledge or experience to respond to this interrogatory.

53) Does Company 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

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

**Response:**

CBT is unfamiliar with BellSouth's process for individual hot cuts.

- 55) If Company has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

**Response:**

CBT is unfamiliar with BellSouth's process for individual hot cuts.

- 56) Does Company 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

- 57) Does Company have any estimates of what a typical bulk 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) What is the largest number of individual hot cuts that Company 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:**

n/a

- 59) Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Company or that Company 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

- 60) Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

- 61) Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Company or that Company 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

- 62) Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

- 63) Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Company or that Company 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

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

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

65) Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Company or that Company 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

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

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

67) Does Company order coordinated or non-coordinated hot cuts?

**Response:**

n/a

68) Does Company use the CFA database?

**Response:**

n/a

69) Identify every issue related to BellSouth's hot cut process raised by Company since October 2001.

**Response:**

None

70) What is the appropriate volume of loops that you contend the Kentucky Public Service Commission 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

71) What is the appropriate process that you contend the Kentucky Public Service Commission 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

72) If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

73) If Company disagrees with BellSouth's bulk hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

74) Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

**Response:**

None

75) How many unbundled loops does Company contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

**Response:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

76) What is the appropriate information that you contend the Kentucky Public Service Commission 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

77) What is the average completion interval metric for provision of high volumes of loops that you contend the Kentucky Public Service Commission 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

78) What are the rates that you contend the Kentucky Public Service Commission 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:**

CBT has insufficient knowledge or experience to respond to this interrogatory.

79) What are the appropriate product market(s) that you contend the Kentucky Public Service Commission 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:**

Because CBT is not challenging the Federal Communications Commission's presumption of impairment with respect to mass market switching, loops or transport in its Kentucky operating territory, CBT has no opinion with respect to this interrogatory for its Kentucky operations. Should CBT challenge the presumption of impairment at any time in the future, however, CBT will offer its opinion with respect to the appropriate market definitions for its Kentucky operations at that time.

80) What are the appropriate geographic market(s) that you contend the Kentucky Public Service Commission 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:**

Because CBT is not challenging the FCC's presumption of impairment with respect to mass market switching, loops or transport in its Kentucky operating territory, CBT has no opinion with respect to this interrogatory for its Kentucky operations. Should CBT challenge the presumption of impairment at any time in the future, however, CBT will offer its opinion with respect to the appropriate market definitions for its Kentucky operations at that time.

81) 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:**

CBT does not currently provide qualifying service outside of its traditional operating territory in Kentucky. CBT, therefore, has no opinion with respect to this interrogatory.

82) Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) 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:**

CBT does not currently provide qualifying service outside of its traditional operating territory in Kentucky. CBT, therefore, has no opinion with respect to this interrogatory.

83) 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 multi-line end users at a single location that the Kentucky Public Service Commission 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:**

CBT is not challenging the national presumption of impairment with respect to mass market switching in Kentucky. At this time, however, CBT believes that the FCC's tentative conclusion of 3 lines or less as mass market is reasonable. CBT reserves the right to reconsider this response should challenge the national presumption in the future.

Respectfully submitted,

---

Ann Jouett Kinney  
201 East Fourth Street  
Room 102-890  
Cincinnati, Ohio 45202  
(513) 397-7260

Attorney for Cincinnati Bell  
Telephone Company

Submitted: November 10, 2003