

# ORIGINAL

Legal Department

J. Phillip Carver  
Senior Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

October 23, 2003

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

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Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc.'s served its Responses and Objections to AT&T's Eighth Set of Interrogatories (Nos. 52-53), dated October 3, 2003.

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,

  
J. Phillip Carver (CB)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**  
**Docket No. 981834-TP and 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (\*), First Class U.S. Mail and Electronic Mail this 23rd day of October, 2003 to the following:

Beth Keating, Staff Counsel  
Adam Teitzman, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

FPSC Staff By E-Mail Only:  
[amaurey@psc.state.fl.us](mailto:amaurey@psc.state.fl.us)  
[bgardner@psc.state.fl.us](mailto:bgardner@psc.state.fl.us)  
[bcasey@psc.state.fl.us](mailto:bcasey@psc.state.fl.us)  
[cbulecza@psc.state.fl.us](mailto:cbulecza@psc.state.fl.us)  
[david.dowds@psc.state.fl.us](mailto:david.dowds@psc.state.fl.us)  
[vrojas@psc.state.fl.us](mailto:vrojas@psc.state.fl.us)  
[jschindl@psc.state.fl.us](mailto:jschindl@psc.state.fl.us)  
[jebrown@psc.state.fl.us](mailto:jebrown@psc.state.fl.us)  
[lking@psc.state.fl.us](mailto:lking@psc.state.fl.us)  
[mbrinkle@psc.state.fl.us](mailto:mbrinkle@psc.state.fl.us)  
[plee@psc.state.fl.us](mailto:plee@psc.state.fl.us)  
[pwickery@psc.state.fl.us](mailto:pwickery@psc.state.fl.us)  
[plester@psc.state.fl.us](mailto:plester@psc.state.fl.us)  
[sasimmon@psc.state.fl.us](mailto:sasimmon@psc.state.fl.us)  
[sbbrown@psc.state.fl.us](mailto:sbbrown@psc.state.fl.us)  
[scater@psc.state.fl.us](mailto:scater@psc.state.fl.us)  
[tbrown@psc.state.fl.us](mailto:tbrown@psc.state.fl.us)  
[vmckay@psc.state.fl.us](mailto:vmckay@psc.state.fl.us)  
[zring@psc.state.fl.us](mailto:zring@psc.state.fl.us)

Joseph A. McGlothlin  
Vicki Gordon Kaufman (+)  
Timothy Perry  
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  
Attys. for Network Telephone Corp.  
Attys. for BlueStar  
Attys. For Covad (+)  
[jmclothlin@mac-law.com](mailto:jmclothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
[tperry@mac-law.com](mailto:tperry@mac-law.com)

Richard A. Chapkis (+)  
Terry Scobie  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)  
[terry.scobie@verizon.com](mailto:terry.scobie@verizon.com)

Paul Turner  
Supra Telecommunications & Info.  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4247  
Fax. No. (305) 476-4282  
[pturner@stis.com](mailto:pturner@stis.com)

Susan S. Masterton (+)  
Sprint Comm. Co. LLP  
1313 Blair Stone Road (32301)  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
[Susan.masterton@mail.sprint.com](mailto:Susan.masterton@mail.sprint.com)

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1027  
Fax. No. (407) 814-5700  
[Ben.Poag@mail.sprint.com](mailto:Ben.Poag@mail.sprint.com)

William H. Weber, Senior Counsel  
Gene Watkins  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
[wweber@covad.com](mailto:wweber@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

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

Verizon Florida, Inc.  
Ms. Michelle A. Robinson  
%Mr. David Christian  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704  
Tel. No. (813) 483-2526  
Fax. No. (813) 223-4888  
[Michelle.Robinson@verizon.com](mailto:Michelle.Robinson@verizon.com)  
[David.Christian@verizon.com](mailto:David.Christian@verizon.com)

Ms. Lisa A. Riley  
Virginia C. Tate  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
[lriley@att.com](mailto:lriley@att.com)  
[vtate@att.com](mailto:vtate@att.com)

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

Catherine K. Ronis, Esq.  
Daniel McCuaig, Esq. (+)  
Jonathan J. Frankel, Esq.  
Wilmer, Cutler & Pickering  
2445 M Street, N.W.  
Washington, DC 20037-1420  
Tel. No. (202) 663-6000  
Fax. No. (202) 663-6363  
[catherine.ronis@wilmer.com](mailto:catherine.ronis@wilmer.com)  
[daniel.mccuaig@wilmer.com](mailto:daniel.mccuaig@wilmer.com)

Jonathan Audu  
c/o Ann Shelfer  
Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)  
[jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

Mickey Henry  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309-3523  
Tel. No. (404) 810-2078  
[michaeljhenry@att.com](mailto:michaeljhenry@att.com)

Mellony Michaux (by e-mail only)  
AT&T  
[mmichaux@att.com](mailto:mmichaux@att.com)


Roger Fredrickson (by e-mail only)  
AT&T  
[rfrederickson@att.com](mailto:rfrederickson@att.com)

Tracy W. Hatch, Esq. (+) (\*)  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street, Ste. 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax No. (850) 425-6361  
[thatch@att.com](mailto:thatch@att.com)

Floyd Self  
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  
Co-counsel for AT&T  
[fself@lawfla.com](mailto:fself@lawfla.com)

Scott A. Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel No. (407) 447-6636  
Fax No. (407) 447-4839  
[www.fdn.com](http://www.fdn.com)

Donna Canzano McNulty, Esquire  
MCI WorldCom  
1203 Governor Square Blvd., Ste. 201  
Tallahassee, Florida 32301

  
J. Phillip Carver

**(+) Signed Protective Agreement**

# ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action To Support Local Competition In BellSouth's Service Territory	)	)	Docket No. 981834-TP
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation	)	)	Docket No. 990321-TP
_____	)	)	Filed: October 23, 2003

### BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO AT&T'S EIGHTH SET OF INTERROGATORIES (NOS. 52-53)

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Responses and Objections to AT&T's Eighth Set of Interrogatories (Nos. 52-53), dated October 3, 2003.

#### GENERAL OBJECTIONS

1. BellSouth objects to each Interrogatory to the extent that it seeks 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 Request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each Interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to each such Interrogatory as being irrelevant, overly broad, unduly burdensome, and oppressive.

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3. BellSouth objects to each Interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this discovery. Any answers provided by BellSouth in response to these Interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

7. BellSouth objects to each Interrogatory to the extent that it seeks to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. BellSouth objects to each Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. BellSouth objects to each Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

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 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. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Interrogatory purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

#### **SPECIFIC RESPONSES**

REQUEST: Please provide the detailed methodology for the collocation power cost study that develops the costs. Please include the following information and any other supporting information that was used to make decisions or assumptions that went into the study:

- a) What the study was designed to produce.
- b) The source of what was used to represent power plant costs and/or investments.
- c) If the study was based on actual projects, what was the criteria for it being included in the study?
- d) Was it a census or sample study?
- e) If it was a sample study, what criteria was used to select the sample?
- f) If it was a sample study, was a statistician involved in the sample selection?
- g) A detailed description of how the numbers were summarized in preparation for becoming the inputs to the BST Cost Model.
- h) A detailed step-by-step description of how the raw data was converted into the cost model inputs.
- i) The source of the construction and cost information along with an electronic copy of all of the data that was used in its raw form.
- j) explanations for each and every piece of information displayed in the electronic copy.



RESPONSE:

- a. The study was designed to produce the average investment and support the monthly cost for power per used amp.
- b. Power plant costs and/or investments were derived from actual power plant construction projects.
- c. There were no specific criteria for selection. Every project that was submitted was included. The Florida Capacity Managers submitted all of the projects that they had available. The sample size includes 711 collocation requests for approximately 38,000 amps of DC power and over \$16, 000,000 in power plant construction.
- d. A sample study.
- e. See BellSouth's response to "c" above.
- f. No.
- g. The total cost was divided by the total amps to get an average investment per amp for the power augments.

RESPONSE: (Cont.)

- h. See Excel file H.1.8, H.1.71 & H.2.4.xls provided in Appendix F of BellSouth's cost study filed on February 4, 2003 in this proceeding. This file contains the Florida raw data used for the cost study input. Raw data for additional states in the BellSouth region was furnished as Exhibit 4 to the Surrebuttal Testimony of W. Bernard Shell filed on September 26, 2003.

The value of \$429.00 (Power Construction \$/Amp-Plant Only) from the table "Region" on the summary worksheet of the Excel file is divided by 1.5 to obtain \$286.00. This value is an input (Average Investment per Fused Amp) for cost Elements 1.8 and 2.4 in the Excel files FLphycol.xls and FLvircol.xls. See the INPUTS\_Recurring worksheet in both of these files.

The factor of 1.5 is the reciprocal of 0.667 and is the BellSouth and industry standard for protection device adjustment (reference BellSouth Technical Reference TR73503, "Engineering and Installation Standards", Section 10 paragraph 4.2).

- i. As summarized in Exhibit No. WBS-4 of the Surrebuttal Testimony of Bernard Shell, data on collocation power plant construction costs and CLEC requested DC amps were collected from a sample of 711 projects across the BellSouth Region, with most of the data from Florida central office projects.

Power Capacity Managers across the BellSouth Region collected and input into linked spreadsheets, raw data for construction costs (where incurred) and CLEC DC power requests (in amps). The data were collected by CLLI code and input into Power Plant Data spreadsheets for each state that participated in the study. Included in the Power Plant Data spreadsheets are the CLLI code, the BellSouth Construction Project Number, the Completion Date, the Total Plant

RESPONSE: (Cont.)

Construction Costs (if any are incurred), and the Requested DC Capacity in Amps for each requesting CLEC.

The Requested DC Capacity in Amps were input directly from Section 6 of the requesting CLEC's Collocation Application. The Plant Construction Costs for each project were pulled from ad hoc reports by the Power Capacity Managers from the BellSouth Construction Management (BCM) system. The BCM is a system that tracks all costs in BellSouth's construction program. Because of the size and complexity of BellSouth's annual construction program, BCM data is periodically purged, and data assembled for this collocation power study (conducted in late 1999) has been purged.

The raw data input for BellSouth's Collocation Power Study, however, is contained in the Power Plant Data spreadsheets, such as the ones provided in BellSouth's Proprietary Response to Item Nos. 32 and 34 of BellSouth's 3<sup>rd</sup> Request for Production of Documents in this proceeding. Data from these spreadsheets were summarized by state as depicted in pages 2 through 28 of Exhibit No. WBS-4 of Bernard Shell's Surrebuttal Testimony. The Total Plant and Cable Power Construction costs and Total CLEC Requested DC Amps for each state were further summarized into a Region total for the entire 711 project study. From this information, BellSouth's Power Construction Cost per Amp was developed.

- j. Please see BellSouth's response to item no. i, above.

RESPONSE PROVIDED BY:

Bernard Shell  
Manager  
675 W Peachtree Street  
Atlanta, GA 30375

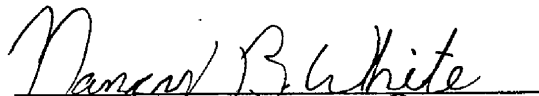
**REQUEST:** Has BellSouth received or conducted any communications with Verizon or Sprint regarding BellSouth's Collocation Cost Model?

- a) If the answer is "yes," please describe all communications between BellSouth and Verizon and BellSouth and Sprint regarding BellSouth's Collocation Cost Model.
- b) Identify all persons having communications with Verizon and Sprint regarding BellSouth's Collocation Cost Model.
- c) Identify the times, nature, and substance of any and all communications between BellSouth and Verizon and BellSouth and Sprint regarding BellSouth's Collocation Cost Model.

**RESPONSE:** BellSouth objects to this interrogatory which calls for the disclosure of information/documents that are protected by the work product privilege, the attorney client privilege, and the joint defense doctrine.

Respectfully submitted this 23rd day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (CB)

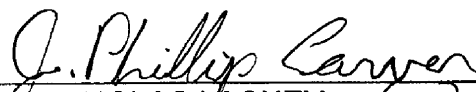
JAMES MEZA III

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY (CB)

J PHILLIP CARVER

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0710

509534