

ORIGINAL

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030867-TL, 030868-TL
030869-TL and 030961-TL
Request for Confidential Classification
Page 1 of 1
12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
SUPPLEMENTAL RESPONSE
TO OPC'S SECOND AND THIRD SET OF INTERROGATORIES (NOS. 25, 27, 39, 41,
42, 43, 46 and 47) AND THIRD REQUEST FOR PRODUCTION (NOS. 26, 27 and 28)
FILED DECEMBER 9, 2003 IN
FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL**

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PUBLIC

REQUEST: Assuming that the company's proposal is adopted without changes (and that the company, and/or its long distance affiliate would flow-through the rate reductions) provide the company's best estimate of the flow-through impact on reduced long distance rates for the company (and/or its long distance affiliate), and reduced long distance rates generally for all of the Florida long distance market for all other carriers. In addition, assuming that the proposals for the other two LECs are adopted without change, provide the company's best estimate of how the combined flow-through impact of the LECs affects the long distance rates generally for all of the Florida long distance market for all other carriers. This information can be expressed as the best estimate impact of the reduction in average long distance revenues per minute, or some other basis for long distance rates. Provide all supporting calculations and explanations.

RESPONSE: Based upon a test period of July 1, 2002 through June 30, 2003, and assuming that the proposals of BellSouth Telecommunications, Inc., Sprint and Verizon are approved as submitted, BellSouth Long Distance would experience an access charge reduction in the range of [REDACTED]. The exact amount will depend on which BellSouth Telecommunications, Inc. plan is adopted. As explained in response to Interrogatory No. 26 above, BellSouth Long Distance would flow-through this amount to its residential and business customers on an approximately pro rata basis, based upon the number of access minutes of use generated by each group of customers.

At this time, BellSouth Long Distance does not have specific plans as to how this aggregate amount would be applied to specific calling plans, whether new plans would be introduced, etc.

RESPONSE BY: James Lauter and Dirk S. Henson, BSLD

REQUEST: For the calendar years ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, Attachment J, provide the total state jurisdictional revenue, basic area service revenue (Account 5001), basic local service revenue (Account 5000), and other local revenue (Account 5060) billed to residential customers.

RESPONSE: Account 5000 is a summary account for accounts 5001, 5002, 5003 and 5004. Amounts provided below are historical BST-Florida single line flat rate residential (1FR) revenues. Accounts 5002, 5003 and 5004 have no 1FR revenue. Therefore, accounts 5000 and 5001 amounts are the same. Following are the jurisdictional 1FR revenues for accounts 5000, 5001 and 5060 billed to residential customers:

	12 Mos End Dec. 31, 2001	12 Mos End Dec. 31, 2002	Year to Date Aug. 31, 2003
5000	[REDACTED]	[REDACTED]	[REDACTED]
5001	[REDACTED]	[REDACTED]	[REDACTED]
5060	[REDACTED]	[REDACTED]	[REDACTED]

RESPONSE BY: Tom Lohman, BST

REQUEST: For BellSouth Complete Choice plans and other services offerings that combine local service with any deregulated service:

- (a) For the calendar year ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, provide the total marketing expenses prior to the allocation of any marketing expenses to the non-regulated services.
- (b) For the calendar year ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, provide the amount of marketing expenses allocated to non-regulated services and BellSouth affiliates.
- (c) For the calendar year ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, provide the amount of marketing expenses allocated to BellSouth's state jurisdictional service.

RESPONSE: Marketing expenses associated with specific products cannot be identified from BST's accounting records. In order to be responsive to this request, provided below are BST-Florida total marketing expenses, total non-regulated marketing expenses and total intrastate marketing expenses.


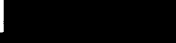
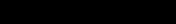
- (a) BST-Florida Part 32 marketing expenses for all services including non-regulated:

Year 2001
Year 2002
YTD 8/03


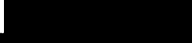
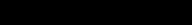


RESPONSE: (Continued)

(b) BST-Florida marketing expenses allocated to non-regulated services:

Year 2001	
Year 2002	
YTD 8/03	


(c) BST-Florida regulated intrastate marketing expenses:

Year 2001	
Year 2002	
YTD 8/03	

RESPONSE BY: Tom Lohman, BST

REQUEST: For the calendar year ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, provide total regulated and state jurisdictional expenses in Account 6613.1 Sales Advertising – Business; Account 6613.2 Sales –Advertising- Residential, revenue; Account 6613.3 Sale Advertising – Public; Account 6613.9 Sales Advertising – Other.

RESPONSE: BST maintains its books and records in accordance with the requirements of the FCC's Part 32 Chart of Accounts, which does not include the subaccount detail requested. Prior to 2003 Part 32 required total Product Advertising expenses to be maintained and recorded to Account 6613. The FCC's Biennial Review Phase 2 order eliminated Part 32 Account 6613 beginning in 2003 by requiring companies to record total marketing expenses, including Product Advertising, in Account 6610. Therefore, the 2003 Product Advertising expenses below are the Product Advertising subset of FCC Account 6610.

	<u>2001</u>	<u>2002</u>	<u>YTD</u> <u>8/03</u>
Total Florida Account 6613: Total Regulated Intrastate			

RESPONSE BY: Tom Lohman, BST

BellSouth Telecommunications, Inc.
Citizen's 2nd and 3rd Set of Interrogatories

Item No. 25

**Attachment to Interrogatory Item
No. 25**

Proprietary

Residence

MTS OCP
Dec-02 [REDACTED]
Aug-03 [REDACTED]

Business

	MTS	OCP
Dec-02	[REDACTED]	[REDACTED]
Aug-03	[REDACTED]	[REDACTED]

BellSouth Telecommunications, Inc.

Citizen's 2nd and 3rd Set of Interrogatories

Item Nos. 41

**Attachment to Interrogatory Item
No. 41**

Proprietary

Florida Consumer Access Lines Inservice

SMAS XLSutils										
Actuals Through AUG, 2003										
View	Trancode	Entity	Category	Series	Series Desc	Precision	2001 Jan	2001 Feb	2001 Mar	2001 Apr
HISTORY	R	CF	INSV	MTALR	CONSUMER FLORIDA TOTAL ACCESS LINES	1				
HISTORY	R	CF	INSV	ADLYR	ADDITIONAL RESIDENCE LINES FLORIDA	1				
HISTORY	R	CF	INSV		PRIMARY RESIDENCE LINES FLORIDA	1				
HISTORY	R	CF	INSV	LLR	RESIDENCE LIFELINE SERVICE	1				

Florida Consumer Access Lines Inservice

Series Desc	2002 Aug	2002 Sep	2002 Oct	2002 Nov	2002 Dec	2002 Ann	2003 Jan	2003 Feb
CONSUMER FLORIDA TOTAL ACCESS LINES	[REDACTED]							
ADDITIONAL RESIDENCE LINES FLORIDA	[REDACTED]							
PRIMARY RESIDENCE LINES FLORIDA	[REDACTED]							
RESIDENCE LIFELINE SERVICE	[REDACTED]							

Florida Consumer Access Lines Inservice

Series Desc	2003 Nov	2003 Dec	2003 Ann
CONSUMER FLORIDA TOTAL ACCESS LINES	[REDACTED]	[REDACTED]	[REDACTED]
ADDITIONAL RESIDENCE LINES FLORIDA	[REDACTED]	[REDACTED]	[REDACTED]
PRIMARY RESIDENCE LINES FLORIDA	[REDACTED]	[REDACTED]	[REDACTED]
RESIDENCE LIFELINE SERVICE	[REDACTED]	[REDACTED]	[REDACTED]

BellSouth Telecommunications, Inc.
Citizen's 2nd and 3rd Set of Interrogatories

Item Nos. 42

**Attachment to Interrogatory Item
No. 42**

Proprietary

PROPRIETARY AND CONFIDENTIAL

BellSouth's Total Business Retail Access Lines and Customer Locations in the BellSouth Franchise Territory in Florida

Responsive to The Citizens of Florida (Citizens) Interrogatory No. 42:

For each month in the calendar years ending December 31, 2001, and December 31, 2002, as well as the study period associated with Caldwell Exhibit DDC-1, Attachment J, provide the number of business accounts and billable access lines.

BellSouth's Total Business Retail Access Lines in-service at each respective period-end are as follows:

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2001												
2002												
2003												

BellSouth's Total Business Customer Locations in-service at each respective period-end are as follows:

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2001												
2002												
2003												

BellSouth Telecommunications, Inc.

Citizen's 2nd and 3rd Set of Interrogatories

Item Nos. 43,44

**Attachment to Interrogatory Item
No. 43 and 44**

**ENTIRE
DOC**

Proprietary

BellSouth Telecommunications, Inc.

Citizen's 2nd Request for Production

POD NO. 26

PROPRIETARY CD ROM

Entire

CD

BellSouth Long Distance, Inc.
Citizen's 2nd Request for Production
POD NO. 26, 27, 28

PROPRIETARY CD ROM

ENTIRE
CD