

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Requirements Arising)
from Federal Communications Commission) Docket No. 030851-TP
Triennial UNE Review: Local Circuit Switching)
for Mass Market Customers.) Filed: December 9, 2003
)

AT&T'S SECOND SUPPLEMENTAL RESPONSES TO BELL SOUTH'S FIRST SET OF INTERROGATORIES

Subject to the General Objections filed with the Florida Public Service Commission on or about October 16, 2003, AT&T Communications of the Southern States, LLC and TCG South Florida (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, and the *Second Order on Procedure*, Order No. PSC-03-1265-PCO-TP, issued September 22, 2003 and November 7, 2003, respectively (hereinafter "*Procedural Orders*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following supplemental responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communication of the Southern States, LLC, served on October 9, 2003, as follows:

DOCUMENT NUMBER 030851-TP
12730 DEC 16 2003
FPSC-001110310100157

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 25: Please state the total number of end user customers in the State of Florida to whom you only provide qualifying service.

Response AT&T incorporates its responses to Interrogatory No. 1. Subject to the foregoing, none.

Provided by: Jay Bradbury

Supplemental Response The total number of end user customers in Florida to whom AT&T provides qualifying service (local only) for AIO is:
XXX Begin Confidential – Subject to Protective Order - End
Confidential – Subject to Protective Order XXX

Please refer to Confidential Attachment 25

Second Supplemental Response: In order to correct error reported for # of Customers in Tennessee and North Carolina, please see Revised Confidential Attachment 25

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 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: AT&T incorporates its objection to Interrogatory #15, *supra*.

Subject to the foregoing, average acquisition cost for all end user customer class is \$125.00. See Attachment No. 34.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 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: AT&T incorporates its objection to Interrogatory No 15, *supra*.
Subject to the foregoing, churn rate is 4.6%. See Attachment No. 34.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 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 to evaluate the project?

Response: AT&T incorporates its objections to Interrogatory No. 15, *supra* and notes that the FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of AT&T or any other particular competitor.

Accordingly, AT&T's determination of whether to offer a "qualifying service in a particular geographic market" and the time periods involved in such evaluation are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing, the period of time used is 3 to 5 years.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 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: AT&T incorporates its objections to Interrogatory No. 15, *supra*.
Subject to the foregoing:
Sales Expenses are included with overall SG&A Expenses (Sales General and Administrative) and are expressed as a percentage of overall customer revenues.

REQUEST: BellSouth First Set of Interrogatories

DATED: October 9, 2003

Interrogatory 49: Based on the definitions 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: Estimated SG&A expenses are 25% of local revenues. See Attachment No. 34.

SUBMITTED this 9th day of December, 2003.

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AT&T's Responses to BellSouth's First Set of Interrogatories

Docket No. 030851-TP

12/9/2003

Revised Attachment No. 25 - Redacted

**REDACTED VERSION ATTACHMENT
TO
INTERROGATORY NO. 25**

DOCUMENT IDENTIFICATION

12730 DEC 10 8

FBI/DOJ INFORMATION SYSTEMS

AIO Customers Counts by State

(As of September 30, 2003)

State	September AIO Bundled Customers	September AIO Local Only Customers		
AL				
FL				
GA				
NC				
TN				
TOTAL				