

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of
BellSouth Telecommunications,
Inc.'s entry into interLATA
services pursuant to Section 271
of the Federal
Telecommunications Act of 1996.

DOCKET NO. 960786-TL
ORDER NO. PSC-01-1830-PCO-TL
ISSUED: September 11, 2001

ORDER ON MOTIONS TO STRIKE
AND REMOVING CERTAIN TESTIMONY
FROM HEARING TRACK

I. Background

Part II of the Federal Telecommunications Act of 1996 (the Act), P.L. 104-104, 104th Congress, 1996, provides for the development of competitive markets in the telecommunications industry. Part III of the Act establishes special provisions applicable to the Bell Operating Companies (BOCs). In particular, BOCs must apply to the FCC for authority to provide interLATA service within their in-region service areas. The FCC must consult with the Attorney General and the appropriate state commission before making a determination regarding a BOC's entry into the interLATA market. See Subsections 271(d)(2)(A) and (B). With respect to state commissions, the FCC is to consult with them to verify that the BOC has complied with the requirements of Section 271(c) of the Act.

On June 28, 1996, we opened this docket to begin to fulfill our consultative role on the eventual application of BellSouth Telecommunications, Inc. for authority to provide in-region interLATA service.

On June 12, 1997, Order No. PSC-97-0703-PCO-TL, Second Order Establishing Procedure, was issued. That Order established the hearing schedule in the case and required BellSouth to submit specific documentation in support of its Petition, which was scheduled to be filed on July 7, 1997. On July 2, 1997, Order No. PSC-97-0792-PCO-TL, Order Modifying Procedural Schedule, was issued. That Order set out additional issues to be addressed.

DOCUMENT NUMBER-DATE

11343 SEP 11 01

FPSC-COMMISSION CLERK

After hearing, having considered the record, by Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, we rendered findings on whether BellSouth had met the requirements of Section 271(c). Specifically, we found that BellSouth was not eligible to proceed under Track B at that time, because it had received qualifying requests for interconnection that if implemented would meet the requirements of Section 271(c)(1)(A), also known as Track A.

Our evaluation of the record on whether BellSouth met the requirements of Section 271(c)(1)(A) indicated that while there was a competitive alternative in the business market, there was not sufficient evidence to determine whether there was a competitive alternative in the residential market. Thus, based on the evidence in the record, we found that BellSouth had not met all of the requirements of Section 271(c)(1)(A). This Commission found that BellSouth had met checklist items 3,4,8,9,10,11,12,13, and the majority of checklist item 7. BellSouth had not met the requirements of checklist items 1,2,5,6, and 14. BellSouth had met the requirements of several checklist items in this proceeding, and therefore, we indicated it may not be required to relitigate those issues before us in a future proceeding. We did find, however, that when BellSouth refiles its 271 case with us, it must provide us with all documentation that it intends to file with the FCC in support of its application. Finally, we found that we could not approve BellSouth's SGAT at that time.

On March 6, 2001, BellSouth filed a Motion to Request Scheduling Conference. On March 28, 2001, a status conference was conducted with all of the parties. Thereafter, by Order No. PSC-01-0832-PCO-TL, issued March 30, 2001, the schedule for this proceeding was established.

On April 24, 2001, I conducted an Issues Identification Conference to discuss which issues needed to be identified for resolution in this proceeding and to hear argument on any disputed issues. Thereafter, I issued Order No. PSC-01-1025-PCO-TL on April 25, 2001. In that Order, I defined the issues to be addressed in this proceeding and specifically excluded certain issues proposed by the parties.

On May 2, 2001, the Florida Competitive Carriers Association (FCCA) and AT&T Communications of the Southern States, Inc., (AT&T)

(herein jointly referred to as FCCA/AT&T) filed a Motion for Reconsideration of the Prehearing Officer's Order. That same day, MCI WorldCom, Inc., (WorldCom) also filed a Motion for Reconsideration. On May 9, 2001, BellSouth filed its Responses to the Motions for Reconsideration. By Order No. PSC-01-1252-FOF-TP, issued June 5, 2001, the Motions for Reconsideration were denied.

In accordance with the schedule set forth in the Order on Status Conference and Updating Procedure, Order No. PSC-01-0832-PCO-TL, issued March 30, 2001, testimony has now been filed in this Docket. However, on August 17, 2001, BellSouth filed a Motion to Strike Portions of Intervenors' Direct Testimony. Thereafter, on August 21, 2001, BellSouth filed a page/line summary of the testimony it believes should be stricken, which is attached and incorporated herein as Attachment A.

In its Motion, BellSouth contends that the testimony it has identified is testimony the Commission has determined is not appropriate to be addressed in the hearing phase of this proceeding; thus, BellSouth asks that it be stricken from the hearing track.

AT&T Communications, AT&T Broadband, TCG South Florida, Covad, KMC Telecom, Nuvox, and XO Florida (hereinafter "ALECs") timely filed their joint Response in Opposition on August 27, 2001. Sprint timely filed its Reply on August 28, 2001. The ALECs contend that it would be impossible to address several of the checklist items, particularly Items 2 and 4, without the testimony identified by BellSouth. Furthermore, they contend that other testimony identified by BellSouth has nothing to do with OSS, but instead addresses the functioning of certain loops, as well as marketplace data they believe the Commission must consider in rendering its decision on the issues in the proceeding. Sprint argues that BellSouth's Motion should be denied because the Sprint testimony BellSouth seeks to strike is directly responsive to BellSouth testimony.

Subsequent to BellSouth's Motion to Strike and the responses, our staff identified some concerns of their own regarding specific testimony that has been filed. They have brought to my attention that they believe this testimony does not conform to my prior order on the issues. Commission staff discussed these concerns with the

parties on August 30, 2001. Thereafter, AT&T, BellSouth, KMC, NuVox, Covad, and Access Integrated submitted responses to staff's concerns on September 7, 2001. I note that KMC's response was also styled as a response to BellSouth's Motion, which for purposes of responding to BellSouth's motion is untimely.

In its response, Access Integrated contends that the testimony of its witness Page should not be stricken because it addresses whether or not BellSouth has opened its network to competition. The company contends that in order "[t]o gauge whether BellSouth has satisfied the checklist, it is necessary to look beyond the mere mechanical aspects of provisioning elements." The company further asserts that if BellSouth is engaging in anticompetitive practices, that must be considered relevant to whether or not BellSouth should be allowed to enter the interLATA market. Access Integrated contends that in order to fully perform its consultative role, the Commission must consider this testimony.

KMC argues that the testimony of its witnesses Espin and Sfakianos should not be stricken because it pertains to the provisioning of loops, as opposed to OSS issues. KMC contends that their testimony conforms with the Commission's prior Orders regarding what is to be addressed in the hearing track. KMC contends that its witnesses' testimony does not address the functionality of the OSS, but whether BellSouth has complied with the checklist item by providing functioning T-1 loops to KMC. Thus, the company argues that this testimony should not be stricken.

NuVox argues that the testimony of its witness Willis should not be stricken because it believes this testimony demonstrates whether or not BellSouth has complied with all of the Section 271 "checklist" items. NuVox contends that this testimony addresses Item 1 of the checklist, pertaining to interconnection, and Item 2, which addresses access to network elements at TELRIC-based prices. NuVox further contends that while the Commission in its original 271 order did emphasize that a proceeding designed to address BellSouth's 271 compliance is not the appropriate forum to resolve company-specific complaints, the Commission did not preclude parties from submitting such evidence to demonstrate BellSouth's lack of compliance with the 271 requirements.

In its response, Covad contends that the testimony of its witness Davis should not be stricken because it pertains to the provisioning of loops and BellSouth's failure to comply with Item 4 of the 271 checklist. Covad argues that the testimony of witness Davis does not discuss the metrics themselves, but instead addresses how BellSouth's own reporting using the metrics indicates that BellSouth has not provided nondiscriminatory access to loops. Covad frames this testimony as "results-oriented."

AT&T also argues that the testimony of its witnesses should not be stricken because it provides "real world" examples of BellSouth's behavior in the marketplace. The company contends that exclusion of this testimony would relegate the hearing track to a hearing only on ". . . BellSouth's 'paper promises' -BellSouth's public statements about what it will offer and how it will offer it." AT&T maintains that if this testimony is stricken, the Commission will be left with a very limited record for this case.

BellSouth believes that specific portions of its testimony should not be stricken, because it is testimony that does not involve OSS/third party testing issues specifically. BellSouth believes that p. 32, line 20 through p. 33, line 9 of witness Cox's surrebuttal testimony should not be stricken because it addresses the situations in which an electronic ordering charge may be imposed, in response to the testimony of Sprint witness Felton. BellSouth also believes that p. 41, line 19 through p. 43, line 4 of witness Milner's direct should not be stricken because it addresses the capabilities of DCS, not OSS. BellSouth also believes that p. 62, line 6 through p. 68, line 20 of witness Milner's direct should not be stricken, because it addresses BellSouth's role in the ALECs' acquisition of loops. In addition, BellSouth does not believe that p. 75, line 10 through p. 76, line 8 of witness Milner's direct should be stricken, because it addresses how BellSouth ensures proper interconnection when an ALEC turns up an NXX.

Furthermore, BellSouth has no objection to the removal of those portions of the testimony of its witnesses Ainsworth, Latham, Milner, Scollard, and Williams that are identified in Attachment B of this Order, which was Commission staff's recommended list.

In addition, BellSouth objects to p. 1, line 1 through p. 3, line 9; p. 14, line 22 through p. 18, line 1; and p. 26, line 18 through p. 28, line 11 of the surrebuttal testimony of its witness Pate being stricken, as identified in Attachment B, unless the corresponding testimony of AT&T's witnesses Turner and Wheeler is also stricken. BellSouth also does not believe that p. 1, lines 1 through 11, line 23, and p. 60, line 24 through p. 75, line 15 of witness Varner's surrebuttal should be stricken, because this testimony responds to testimony of witnesses Sfakianos, Campbell, and Patfield that has not been identified to be stricken.

Also on September 7, 2001, Florida Digital Network, Inc. (FDN) filed a Motion to Strike Portions of Prefiled Surrebuttal Testimony and Exhibits of BellSouth Telecommunications, Inc. Rule 28-106.303(1), Florida Administrative Code, provides that parties may file responses to motions within seven days, if time allows. In this instance, I do not find that time allows for responses from the parties. I note, however, that the issues raised in the motion are identical to those already addressed with regard to the other witnesses; thus, the pleadings and responses already filed provide a more than adequate basis for my decision on FDN's motion rendered herein.

Commission staff has identified a concern that the testimony identified in the matrix attached and incorporated into this Order as Attachment B should be removed from the hearing track of this docket. Specifically, there is concern that the testimony identified in Attachment B addresses aspects of OSS, such as pre-ordering, ordering, maintenance, provisioning, and billing that are currently being addressed in the Third Party OSS Testing (TPT) being conducted by KPMG. The last column of the attachment provides a brief description of what the testimony addresses.

In addition, the testimony identified in Part II of Attachment B identifies testimony that Commission staff also believes should be stricken, because it pertains to company-specific complaints that this Commission specifically stated in our Final Order on the prior hearing in this Docket was not appropriate for consideration and resolution in this proceeding. See Order No. PSC-97-1459-FOF-TL, issued November 19, 1997, at p. 14.

ORDER NO. PSC-01-1830-PCO-TL

DOCKET NO. 960786-TL

PAGE 7

In its Motion to Strike, FDN argues that it has been precluded from addressing BellSouth's winback programs in this Docket by Order No. PSC-01-1025-PCO-TL. Therefore, it did not submit testimony on the subject. FDN submits, however, that Access Integrated's witness Page has submitted testimony on the subject, which Commission staff is now recommending should be stricken. If that testimony is to be stricken, FDN contends that I should also strike the surrebuttal testimony of BellSouth's witness Cox, which responds to witness Page's testimony. The specific page and line numbers are identified in Attachment C to this Order, which is incorporated in this Order. FDN adds that it believes that the identified portions of both witness Page's testimony, as shown in Attachment B, and witness Cox's testimony, as shown in Attachment C, must be stricken, because consideration of the subject of winback issues has specifically been excluded from this proceeding.

Upon consideration, I find that the testimony identified by BellSouth in its Motion to Strike, as set forth in Attachment A, shall be stricken. The topics addressed in the identified testimony were contemplated to be addressed in the TPT, as set forth in Order No. PSC-99-1568-PAA-TP, issued August 9, 1999, (Order on Third Party Testing) and consummated as a final order on September 2, 1999; Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, (Order Approving Master Test Plan) and consummated as a final order on February 2, 2000; and Order No. PSC-00-0260-PAA-TL, issued February 8, 2000, (Order on Interim Metrics) and consummated as a final order on March 1, 2000. Furthermore, in reliance on those Orders, I defined the scope of the hearing track of this proceeding in the Order Regarding Issues to be Addressed at Hearing, Order No. PSC-01-1025-PCO-TL, issued April 25, 2001.

As for the testimony identified by Commission staff, I agree that certain portions of that testimony must also be stricken because the identified portions address OSS issues that are covered by the OSS testing. Therefore, on my own motion, I hereby strike the additional testimony identified in Attachment D, which is attached and incorporated in this Order. While this testimony is stricken from the hearing track, parties will not be precluded from resubmitting this testimony as comments in the OSS testing phase of this proceeding.

The testimony of Nuvox witness Willis will not be stricken, because I agree that this testimony is relevant to a demonstration of BellSouth's compliance, or lack thereof, with a specific checklist item through "real world" experience. I also have not stricken the portions of BellSouth witness Cox's surrebuttal, as identified in BellSouth's September 7, 2001, response, nor those portions of witness Milner's direct testimony, except for p. 62, line 6 through p. 68, line 20. I agree that these portions, except for the latter identified portion, are not clearly addressed in the OSS Third Party test. In addition, I have not stricken the portions of witnesses Pate's and Varner's surrebuttal identified in BellSouth's response.

With regard to witness Page's testimony, this testimony relates to a complaint that Access Integrated has that BellSouth excluded Access Integrated's customers from the white pages, yellow pages, and directory assistance, and that BellSouth has generally misrepresented Access Integrated's service. This testimony does not appear to address BellSouth's compliance with a checklist item, but instead focuses on BellSouth's manner of dealing with Access Integrated that Access Integrated finds inappropriate. This appears to be beyond the scope of this proceeding, and shall therefore, be stricken. Likewise, the responsive testimony of BellSouth's witness Cox, p. 51, line 4 through p. 52, line 31 and Exhibit CKC-10, as identified by FDN, shall also be stricken.

Based on the foregoing, BellSouth's Motion to Strike is hereby granted. The testimony identified in Attachment A to this Order, and any corresponding exhibits, shall be stricken. Furthermore, on my own motion, I hereby strike the testimony identified in Attachment D to this Order, and any corresponding exhibits. I also grant FDN's Motion to Strike as outlined in the body of this Order, and included in Attachment D. Furthermore, the parties shall by October 3, 2001, refile the testimony of the witnesses identified herein as having testimony stricken, deleting the stricken testimony. This is not an opportunity to revise or supplement testimony.

It is therefore

ORDERED by Commissioner J. Terry Deason, as Prehearing Officer, that BellSouth Telecommunications, Inc.'s Motion to Strike

ORDER NO. PSC-01-1830-PCO-TL
DOCKET NO. 960786-TL
PAGE 9

is granted as set forth in the body of this Order and identified in Attachment A, which is incorporated by reference in this Order. It is further

ORDERED that Florida Digital Network, Inc.'s Motion to Strike is granted as set forth in the body of this Order and identified in Attachment D, which is incorporated by reference in this Order. It is further

ORDERED that on my own motion the additional testimony identified in Attachment D is stricken as set forth in the body of this Order. It is further

ORDERED that to the extent testimony identified in Attachment B is not also identified in either Attachment A or D, the testimony identified in Attachment B shall not be stricken. Attachment C is subsumed in Attachment D. It is further

ORDERED that the parties shall, by October 3, 2001, refile the testimony of the witnesses identified herein as having testimony stricken, deleting the stricken testimony.

By ORDER of Commissioner J. Terry Deason as Prehearing Officer, this 11th Day of September, 2001.



J. TERRY DEASON
Commissioner and Prehearing Officer

(S E A L)

BK

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.0376, Florida Administrative Code, if issued by a Prehearing Officer; (2) reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or (3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of the Commission Clerk and Administrative Services, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

ATTACHMENT A

**BELLSOUTH TELECOMMUNICATIONS INC.'S MOTION TO STRIKE PORTIONS
OF SELECT INTERVENOR'S DIRECT (Rebuttal) TESTIMONY**

Company	Witness	Testimony	Page/Line
AT&T	Berger	Rebuttal	Page 12, line 11 through Page 15, line 4. Page 17, line 1 through Page 18, line 2. Page 22, line 15 through Page 24, line 15. Page 28, line 21 through Page 32, line 2. Page 35, line 9 through Page 36, line 12. Page 42, lines 11 - 22. Exhibit DCB-5
AT&T	Bradbury	Rebuttal	Page 5, lines 3-8.
NuVox	Campbell	Rebuttal	Page 3, line 1 through page 9, line 21. Page 13, line 10 through page 19, line 6.

Company	Witness	Testimony	Page/Line
KMC	Espin	Rebuttal	Page 4, lines 3-13. Page 8, line 21 through page 9, line 9.
Sprint	Felton	Rebuttal	Page 3, line 8 through page 4, line 19. Page 5, line 16 through page 6, line 5.
AT&T	Norris	Rebuttal	Page 6, line 8 through page 28, line 17. Exhibits SEN-4 through SEN-25.
XO	Padfield	Rebuttal	Page 3, line 1 through page 6, line 9.
AT&T	Seigler	Rebuttal	Pages 8-10. Page 11, 1 st paragraph. Pages 16-18. Page 19, 1 st paragraph. Page 26, 2 nd paragraph. Page 27.
KMC	Sfakianos	Rebuttal	Page 3, line 5 through page 4, line 18.

ORDER NO. PSC-01-1830-PCO-TL

DOCKET NO. 960786-TL

PAGE 13

Company	Witness	Testimony	Page/Line
AT&T	Turner	Rebuttal	Page 22, line 7 through page 24, line 3.
AT&T	Wheeler	Rebuttal	Page 8, line 20 through page 20, line 10.

ATTACHMENT B

**COMMISSION STAFF'S RECOMMENDED LIST
 OF TESTIMONY TO BE STRICKEN**

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
BellSouth	Ainsworth	Surrebuttal	p. 6 line 9 through p. 19 line 25	Various OSS issues - Order status information, UNE-P migration, and processing of service requests
			p. 25 line 1 through p. 28 line 25	Various OSS issues - trouble reports, provisioning of UNEs and missed commitments
			p. 29 line 1 through p. 35 line 17	LCSC - submittance and routing of Orders, LSRs, jeopardy notices, clarification, etc.
	Cox	Surrebuttal	p. 32 line 20 through p. 33 line 9	Manual v. electronic interfaces

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
	Fields	Surrebuttal	p. 2 line 17 through p. 6 line 7	LCSC personnel training
			p. 6 line 9 through p. 7 line 20	Issuance of service orders
			p. 7 line 22 through p. 8 line 20	EBD indicator/D and N orders
	Harris	Surrebuttal	p. 7 line 9 through p. 11 line 6	Disconnect and New orders
	Latham	Direct	p. 12 line 24 through p. 14 line 15	Pre-ordering of XDSL capable loops & Obtaining manual LMU information
			p. 15 line 14 through p. 17 line 20	Ordering XDSL capable loops
	Milner	Direct	p. 41 line 19 through p. 43 line 4	Management terminal interface
			p. 74 line 1	Ordering & provisioning
			p. 75 line 10 through p. 76 line 8	Provisioning of NXX codes

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
			p. 60 lines 15 - 18	LMU Data
			p. 62 line 6 through p. 68 line 20	Hot Cuts
	Milner	Surrebuttal	p. 12 line 11 through p. 24 line 9	Hot Cuts
			P. 15 line 23 through P. 16 line 21	Ordering and FOC delays, provision of facility information, LFACs records
	Pate	Surrebuttal	All	OSS; Business rules; LENS; numerous OSS issues
	Scollard	Surrebuttal	p. 5 line 13 through page 8 line 24	BANs
	Varner	Surrebuttal	All	Performance measures
	Williams	Direct	p. 6 lines 2-20	Ordering & Provisioning of Line Sharing Splitter

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
			p. 7 line 14 through p. 8 line 15	Test of Line Sharing Procedures
			p. 11 line 20 through p. 12 line 2	LMU Info. from LENS or TAG
			p. 12 line 22 through p. 15 line 17	Ordering of line sharing
AT&T	Berger	Rebuttal	p. 3 line 12 through p. 12 line 10	Hot Cuts
			p. 15 line 5 through p. 16 line 24	Pre-FOC CFA checks
			p. 18 line 3 through p. 22 line 14	Disagreement over hot cuts start & stop times
	Bradbury	Rebuttal	p. 8 line 10 through p. 9 line 2	Provisioning and business rules
			p. 12 line 18 through p. 13 line 8	OLNS testing
	Seigler	Rebuttal	p. 6 lines 9 through 17	OSS test items

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
			p. 15 line 9 through p. 16 line 10	Order rejections (LENS)
			p. 19 line 15 through p. 21 line 10	Change in order procedures without notification
			p. 21 line 11 through p. 26 line 9	Billing number assignment
	Norris	Rebuttal	ALL	Performance measures and accuracy of performance measures data
Covad	Davis	Rebuttal	p. 2 line 17 through p. 17 line 4	Ongoing problems with access to loops (LCSC) and loop provisioning
			p. 17 line 10 through p. 19 line 18	Performance measures
KMC	Espin	Rebuttal	p. 3 line 15 through p. 8 line 20	Provisioning

PARTY	WITNESS	TESTIMONY PROFFERED	PAGE(S) / LINE(S)	DESCRIPTION
			p. 9 line 10 through p. 10 line 9	Trouble within 30 days, trouble on circuits with prior troubles
Sprint	Felton	Rebuttal	p. 4 line 21 through p. 5 line 15	Additional electronic sources of LMU information
			p. 6 lines 7-22	Access to LMU information

Part II

Access Integrated	Page	Rebuttal	p. 4, line 9 through p. 7, line 14	Company-specific complaint
Nuvox	Willis	Rebuttal	p. 3, line 1 through p. 4, line 17	Company-specific complaint

ORDER NO. PSC-01-1830-PCO-TL
DOCKET NO. 960786-TL
PAGE 20

ATTACHMENT C

FDN'S RECOMMENDED LIST OF TESTIMONY TO BE STRICKEN

BellSouth	Cox	Surrebuttal	p. 51, line 4 through p. 52, line 31	Complaint- specific testimony responsive to that filed by Access Integrated witness Page
------------------	-----	-------------	---	---

ATTACHMENT D

TESTIMONY TO BE STRICKEN
(IN ADDITION TO THAT IDENTIFIED IN ATTACHMENT A)

Company	Witness	Testimony	Page/Line
BellSouth	Ainsworth	Surrebuttal	p. 6 line 9 through p. 19 line 25
			p. 25 line 1 through p. 28 line 25
			p. 29 line 1 through p. 35 line 17
	Cox	Surrebuttal	p. 51, line 4 through p. 52, line 31 Exhibit CKC-10
	Fields	Surrebuttal	p. 2 line 17 through p. 6 line 7
			p. 6 line 9 through p. 7 line 20
			p. 7 line 22 through p. 8 line 20
	Harris	Surrebuttal	p. 7 line 9 through p. 11 line 6
	Latham	Direct	p. 12 line 24 through p. 14 line 15

Company	Witness	Testimony	Page/Line
			p. 15 line 14 through p. 17 line 20
	Milner	Direct	p. 74 line 1
	Milner	Direct	p. 60 lines 15 - 18
			p. 62 line 6 through p. 68 line 20
	Milner	Surrebuttal	p. 12 line 11 through p. 24 line 9
			P. 15 line 23 through P. 16 line 21
	Pate	Surrebuttal	All, except p. 1, line 1 through p. 3, line 9; p. 14, line 22 through p. 18, line 1; and p. 26, line 18, through p. 28, line 11.
	Scollard	Surrebuttal	p. 5 line 13 through page 8 line 24

Company	Witness	Testimony	Page/Line
	Varner	Surrebuttal	All, except page 1, line 1 through p. 11, line 23; and p. 60, line 24 through p. 75, line 15.
	Williams	Direct	p. 6 lines 2-20
			p. 7 line 14 through p. 8 line 15
			p. 11 line 20 through p. 12 line 2
			p. 12 line 22 through p. 15 line 17
AT&T	Berger	Rebuttal	p. 3 line 12 through p. 12 line 10
			p. 15 line 5 through p. 16 line 24
			p. 18 line 3 through p. 22 line 14
	Bradbury	Rebuttal	p. 8 line 10 through p. 9 line 2
			p. 12 line 18 through p. 13 line 8

Company	Witness	Testimony	Page/Line
	Seigler	Rebuttal	p. 6 lines 9 through 17
			p. 15 line 9 through p. 16 line 10
			p. 19 line 15 through p. 21 line 10
			p. 21 line 11 through p. 26 line 9
	Norris	Rebuttal	ALL
Covad	Davis	Rebuttal	p. 2 line 17 through p. 17 line 4
			p. 17 line 10 through p. 19 line 18
KMC	Espin	Rebuttal	p. 3 line 15 through p. 8 line 20
			p. 9 line 10 through p. 10 line 9
Sprint	Felton	Rebuttal	p. 4 line 21 through p. 5 line 15
			p. 6 lines 7-22
Nuvox	Willis	Rebuttal	p. 3, line 1 through p. 4, line 17