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00 MAY 22 PM 4:41

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RECORDS AND
REPORTING

May 22, 2000

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

Re: Docket No. 990649-TP (UNE Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses to AT&T's First Requests for Production of Documents. Please file this in the captioned docket. BellSouth also this day has served its responses to AT&T's First Set of Interrogatories.

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,

Bennett L. Ross
Bennett L. Ross (BR)

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

APP _____
CAF _____
CMP Dehila
COM 5
CTR _____
ECR 3
LEG 2
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SEC 1
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OTH _____

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06299 MAY 22 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Pricing of Unbundled Network)
Elements)
_____)

Docket No. 990649-TP
Filed: May 22, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSES TO AT&T'S FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS

GENERAL OBJECTIONS

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") asserts the following general objections to the First Requests for Production of Documents served by AT&T Communications of the Southern States, Inc. ("AT&T") on May 2, 2000.

1. BellSouth objects to the requests to the extent that such requests seek 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 requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted AT&T's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by BellSouth in response to AT&T's requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to

Section 90.506, Florida Statutes. To the extent that AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

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 Florida Public Service 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. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, BellSouth's responses will provide, subject to any applicable objections, all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with these requests. BellSouth shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense. To the extent that AT&T requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, BellSouth incorporates herein by reference its objections to that previous discovery.

REQUESTS FOR PRODUCTION

Subject to the General Objections stated herein, BellSouth provides the following responses to AT&T's First Request for Production:

Request No. 1: In reference to footnote 4, on page 12 of the BellSouth Telecommunications Loop Model Methodology Manual, provide the referenced sections of Lucent's Outside Plant Engineering Handbook (1996) and the Telcordia's Notes on the Network (1997).

Response: Attached are the referenced sections of the Lucent's Outside Plant Engineering Handbook (1996) (Attachment No. 1) and the Telcordia's Notes on the Network (1997) (Attachment No. 2).

Request No. 2: Please provide any studies and/or analyses that justify your response to AT&T's First Interrogatory No. 18 regarding drop terminal assignments.

Response: See response to Interrogatory Item No. 18. BellSouth has not conducted any additional studies and/or analyses.

Request No. 3: Please provide any studies and analyses that support the use of extenders to create the least-cost network

Response: BellSouth has not conducted any studies or analyses. However the use of "extenders" allows the model to expand the CSA size beyond 12,000 feet to include customer locations rather than creating new CSAs with only a few customer sites; thus reducing the number of DLC RT locations and overall DLC investment. The model allows the user to select when extenders are placed and the anticipated economic crossover.

Request No. 4: Please provide all studies and analyses to support your response to AT&T's First Interrogatory No. 25 regarding distribution cable.

Response: See BellSouth's response to AT&T's First Interrogatory No. 25. BellSouth has not conducted any additional studies or analyses.

Request No. 5: Please provide a complete set of ARMIS data down to the sub-account level.

Response: See attached ARMIS Report 43-03 for BST and Florida for the year ending December 31, 1999.

Request No. 6: Please provide the supporting documentation, correspondence with vendors, analysis, and calculations for the Switch Feature Hardware study inputs, showing investments, discounts, capacities and average utilization.

Response: Calculations for the Switch Feature Hardware Study are included in the SST-Usage Study. For this study, see the following section of the proprietary CD-ROM provided in BellSouth's April 17, 2000 Cost Study Filing in this proceeding:

Data\FL Docket No 940649-TP\State Average\Invstmts\
FLSt_SST_U.xls.

Attachment No. 1 provides proprietary correspondence requesting supporting data. This document is proprietary and is being produced subject to the provisions of the nondisclosure agreement executed by AT&T.

Request No. 7: In RTU560c2.xls file, please provide all supporting budget, finance, forecast data or any other relevant documentation, analysis and

calculations used to generate the estimated 560C value. Please provide the Right to use special study referenced in the Input Data Dictionary.

Response: An initial step in the process involved "normalizing" 1998 base period expenses to remove the impact of Software Right-to-Use (RTU) expenses that would be capitalized in future periods (effective 01/99). Network and Account Classification Subject Matter Experts (SMEs) with expertise in the area of Software RTU expenditures projected the impact of the change in software RTU accounting on the 1999 operations of the company (see top section of Attachment No. 1). These amounts were restated to 1998 levels for use in "normalizing" base period expenses (see bottom section of Attachment No. 1) using the 1999 growth rates displayed in BellSouth's April 17, 2000 Cost Study Filing in this proceeding (See file EXPPRJ00.DOC, Growth Rates Exhibit L, Page 16 in directory Documentation\Xappendix\Appendix F). Attachment No. 1 is the RTU special study referenced in the Input Data Dictionary. The "normalized" 1998 base period expenses provided the foundation for projecting operating expenses related to the 2000-2002 test period.

Another step in the process involved obtaining projections of additions to the new intangible asset account 2690.5000 Software RTU-Network for the 1999-2002 period from the Network Budgets organization (see Attachment No. 2). Account.SRC 2690.5000 includes the original cost of network switch, network circuit, network other, and operator services software. The projected 2690.5000 amounts did not include any detail of the various types of software referenced above. Therefore, a relationship of Software RTU-Network Switching dollars to Software RTU-Network Total dollars from the "normalizing" study was utilized as a proxy to estimate the portion of projected 2690.5000 related to 560C Software RTU-Network Switching (96.2%).

Request No. 8: Please provide the accounting guidelines, account definitions and any other documents explaining what types of expenditures are charged to 560C at the most detailed account level available. Include both USOA and field reporting code information.

Response: See BellSouth's response to AT&T's First Interrogatory Item No. 38.

Request No. 9: Please provide the documents and analysis that the Network Budgets Group used to generate the 2690.5 projected value for 2000-2002 (see rtu560c2.xls).

Response: See BellSouth's response to AT&T's First Request for Production of Documents No. 7, Attachment No. 2.

Request No. 10: Please provide the Regulatory Accounting Group Study that developed the percent of account 2690.5 related to 560C (see rtu670c2.xls).

Response: See BellSouth's response to AT&T's First Request for Production of Documents No. 7.

Request No. 11: Please provide documents and calculations to quantify and describe the adjustments referenced in AT&T's First Interrogatory No.39.

Response: Excel files PLSP99EY.XLS and EXPPRJ00.XLS (See directory Documentation\Xappendix\Appendix F of BellSouth's April 17, 2000 Cost Study Filing in this proceeding) quantify the adjustments described in AT&T's First Interrogatory No.39. The referenced adjustments appear on worksheets "MR Reg Exp98" and "FL" in the respective workbooks.

Request No. 12 : Please provide the MDF special study, including all supporting documents, analysis and calculations referenced in AT&T's First Interrogatory No. 42.

Response: See the following sections of the proprietary CD-ROM provided in BellSouth's April 17, 2000 Cost Study Filing in this proceeding:

Description	CD-ROM Directory	File Name
Main Distributing Frame (MDF) Material Price Study	Documentation\Section 4	MDF_FUND.xls

MDF Material Price Study Description	Documentation\Section 1	Narative.doc (Section 4, Item 7)
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Request No. 13: Please provide all documents, analysis used to derive the inputs referenced in AT&T's First Interrogatory No. 43.

Response: Attached are three EXCEL files used to determine the quantity of analog lines to use in SCIS/MO. Those files are FLYE98lines.xls (Attachment No. 1) and FL_lines_d&a.xls (Attachment No. 2) and Attachment 3.

Request No. 14: The following production requests are in reference to the Data Dictionary:

- a) "Equivalent Business Days" Input: Please provide all supporting documents, analysis and calculations for the statement that "each non-business day has one half the usage of a business day."
- b) "Call Completion Ratio" Input: Please provide all documents and calculations referenced in AT&T's First Interrogatory No. 45b.
- c) "Average Non-Conversation Time" Input: Please provide original 1996 results, all documents and calculations to trend the results referenced in AT&T's First Interrogatory No. 45c.
- d) "Average Number of Minutes/Call" Input: Please provide all documents referenced in AT&T's First Interrogatory No. 45d.

- e) **“(5ESS) BH CMP Processor Call Handling Capacity” Input:**
Please provide the Lucent document dated 06/04/99 and any other documents supporting this input.
- f) **“(5ESS) % of CMP Processor Time Available for Call Processing” Input:** Please provide the Lucent document dated 11/99 and any other documents supporting this input.
- g) **“(5ESS) SM Processor EPHCs per Call Setup” Input:** Please provide the Lucent practices and any other documents supporting this input.
- h) **“(5ESS) SM and SM-2000 Processor EPHC Capacity” Input:**
Please provide memo dated 01/04/00 and any other documents supporting this input.
- i) **“(DMS) BH Processor Call Handling Capacity (SN70EM) and % of SN70 Processor Time Available for Call Processing”**
Input: Please provide all documents, analysis and calculations supporting this input.
- j) **“Average Busy Season Busy Hour CCS per Circuit” Input:**
Please provide the CCS data that is expected to be available in the April/May, 2000 timeframe.
- k) **“Central Office Feature Inputs” Input:** Please provide all documents, analysis and calculations from Network supporting the Holding Times per Feature.

- l) "Average Busy Hour Calls per Feature" Input: Please provide the UNE Feature Usage Study shown as the source of this data. Include all supporting documents, analysis and calculations.
- m) "Equivalent Busy Hour Call Attempts" Input: Please provide the documents, analysis and calculations used to derive the ratio for switch feature real-time to POTS call real-time. Include the source documents shows as the SCIS/IN real-time tables and the vendor capacity management tools.

Response:

- a) The statement that "each non business day has one half the usage of a business day" is a study assumption, accepted as an industry-standard, used in calculating the equivalent business days input. See the following section of the CD-ROM provided in BellSouth's April 17, 2000 Cost Study Filing in this proceeding:

Documentation\Xappendix\Appendix D\SST_IDC.doc, page 133.

- b) Attachment No. 1 provides the data used to trend the call completion ratio input.
- c) The data in Attachment No. 1 was used to trend the average non conversation time input.
- d) The average number of minutes per call input used for the Florida study was developed from a mechanized reporting system based on a sample of individual customer call detail records. There are no paper records readily available.
- e) The requested Lucent document dated 06/04/99 is attached as Attachment No. 2. This document is proprietary and is being produced subject to the provisions of the nondisclosure agreement executed by AT&T.
- f) The requested Lucent document dated 11/99 is attached as Attachment No. 3. This document is proprietary and is being produced subject to the provisions of the nondisclosure agreement executed by AT&T.

- g) Section 2.1 of the Lucent document dated 11/99, as provided in response to item 14(f), contains support for this input.
- h) See Attachment No. 4. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.
- i) See Attachment No. 5. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.
- j) The requested data is not available.
- k) The holding time input is only used for hardware-related features. Inputs formerly used in retail cost studies were averaged to determine the holding times for these features.

The computation follows:

Equipment	Holding Time (Sec)
30-Second Announcement	24
60-Second Announcement	48
DSU2/RAF/BRCS	24
6-port Conference Circuit	180
3-port Conference Circuit	180

The average of the inputs displayed in the chart rounds to 90 seconds.

- l) In order to obtain average usage data, 56 features (over 20% of the unique switch features) were reviewed. These features were analyzed as to which switch resources were required to process the feature call, processor, line, hardware, and/or SS7. BellSouth's retail study inputs (busy hour calls) were then input into a matrix. This allowed the development of an average call demand by type of switch resource required. The next step was to consider the number of features an average user would utilize, which BellSouth determined to be 4 features used by a typical customer. The calculations are displayed in the chart provided in Attachment No. 6.
- m) This input is provided as a potential modification to the assumption that each vertical feature uses realtime equivalent to that of a call setup. This input is set to 100%. The processor realtimes for the SCIS/IN switch features are available from the SCIS/IN Realtime Tables. These Realtime Tables are part of the Telcordia™ Switching Cost Information System "SCIS/MO and SCIS/IN for BellSouth" Release 2.6.1

CD ROM, which has already been served to AT&T in this proceeding. The referenced CD is proprietary and was provided subject to the nondisclosure agreement executed by AT&T.

See Attachment No. 7. This information is proprietary and is being provided subject to the provisions of the nondisclosure agreement executed by AT&T.

Request No. 15: Please provide all contracts, bid letter and responses, general letters, correspondence or any other documents that control or impact end office and tandem switch prices BellSouth currently pays or expects to pay in the future. Switch price data should include both hardware and software.

Response: BellSouth has no responsive documents.

Request No. 16: Provide all necessary files and data to run the BSTLM using only BellSouth customer service records (a version of the BSTLM without allocating surrogate locations based on US Census data and PNR and Associates data.)

Response: There is no option to run BSTLM© without surrogate placement of BellSouth customer service records. The options in BSTLM© to build a network include building to 1) BellSouth customer only, 2) BellSouth customers plus non-BellSouth customer households, and 3) BellSouth customers plus non-BellSouth customer households and housing units. BellSouth's filing only included building to BellSouth customer locations. Page 22 of the manual states that the surrogation technique was used to place BellSouth customer locations that could not be successfully geocoded as AS0 or ZIP4.

Request No. 17: For each labor rate referred to in BellSouth's Cost Studies, produce copies of the union contract (e.g., CWA) that is associated with the work activities identified in the non-recurring cost studies.

Response: The contract between the Communications Workers of America and BellSouth Telecommunications lists weekly wage rates for various wage scales by location and length of service. This wage information is by different job categories, location and time frame and was not used in the development of the regional labor rates by job function for BellSouth's Cost Study Filing in this proceeding dated April 17, 2000. Refer to Section 5, Pages 10 to 13 of BellSouth's Cost Study for an explanation of labor rate rationale. For the development of labor rates, see the enclosed diskette.

Request No. 18: Please produce all correspondence between (1) BellSouth and (2) any and all of its suppliers of digital switching equipment, which quotes, discusses, or in any other way references the retail price of a digital switching machine and/or all discounts to the retail price offered to BellSouth of digital switching machines.

Response: BellSouth will make this information available for AT&T's review at BellSouth's offices, 675 West Peachtree Street, Atlanta, GA. This information contains vendor proprietary information and will be made available at a mutually convenient time subject to the terms of the nondisclosure agreement executed in this docket.

Request No. 20: Please produce copies of all contracts between BellSouth and each of its suppliers which document the purchase of 1 or more digital switching machines.

Response: BellSouth will make this information available for AT&T's review at BellSouth's offices, 675 West Peachtree Street, Atlanta, GA. This information contains vendor proprietary information and will be made available at a mutually convenient time subject to the terms of the nondisclosure agreement executed in this docket.

Request No. 21: Please produce copies of all contracts between BellSouth and each of its suppliers which document the purchase of software associated with digital switching machines.

Response: BellSouth will make this information available for AT&T's review at BellSouth's offices, 675 West Peachtree Street, Atlanta, GA. This information contains vendor proprietary information and will be made available at a mutually convenient time subject to the terms of the nondisclosure agreement executed in this docket.

Respectfully submitted this 22th day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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213619

CERTIFICATE OF SERVICE
Docket No. 990649-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

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