

ORIGINAL

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020129-TP
Request for Confidential Classification
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9/30/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ITC^DELTACOM
COMMUNICATION, INC.'S SUPPLEMENTAL RESPONSE TO STAFF'S FIRST
SET OF INTERROGATORIES AS FILED ON SEPTEMBER 9, 2002
IN FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 020129-TP**

2 Redacted Copies for Public Disclosure

DOCUMENT NUMBER DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of US LEC of Florida)
Inc., Time Warner Telecom of Florida, and)
ITC^DeltaCom Communications)
objecting to and requesting)
suspension of proposed CCS7)
Access Arrangement Tariff filed by)
BellSouth Telecommunications, Inc.)
)
)
)

Docket No. 020129-TP

Filed: September 9, 2002

ITC^DELTACOM COMMUNICATION, INC.'S SUPPLEMENTAL RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES

1 ITC^DeltaCom Communications, Inc. (ITC^DeltaCom) hereby submits its supplemental
2 response to Interrogatory No. 2(c) of Staff's First Set of Interrogatories.

3 2(c) Has ITC^DeltaCom estimated what charge it would need to levy for the analogous
4 functionality to that in BellSouth's tariff filing?

5 **Response:**

6 No. We do not have reliable estimate at this time. By "analogous" we assume that you
7 are referring to billing SS7 on a per message basis for ISUP and TCAP messages and we
8 would bill both terminating and originating messages just as BellSouth has proposed in
9 its tariff. First, we fundamentally disagree that we should be billing both originating and
10 terminating messages. We do not believe that is a sound or fair billing practice. Second,
11 we are not currently capable of counting ISUP and TCAP messages; storing the
12 recording/billing detail; and billing on a per message basis. Based on conversations with
13 outside vendors, a rough estimate would be approximately [REDACTED] to upgrade our
14 STP infrastructure (regionwide) and another [REDACTED] for hardware and software
15 associated with modifying our billing systems and obtaining additional storage. We
16 believe this is a conservative estimate of the cost.

17 *After reviewing BellSouth's cost study, it is our understanding that BellSouth paid*
18 *approximately [REDACTED] in capital cost for the Agilent LMS. This causes us to*
19 *question the rough estimate previously provided, and we now believe that purchasing and*
20 *implementing an analogous SS7 billing system could cost many times more than our*
21 *previous estimate. It is unreasonable to expect small carriers like ITC^DeltaCom and US*
22 *LEC to make the "defensive" purchase of such a system, particularly for a tariff that is*
23 *supposed to be revenue neutral.*

Response provided by: Steve Brownworth and Billy Adkinson

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