

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
Request for Confidential Classification  
Page 1 of 1  
7/1/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO STAFF'S 2<sup>ND</sup> INTERROGATORIES, ITEM NOS. 24, 41 AND 65  
AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST NO. 4 AS FILED  
JUNE 10, 2003, IN FLORIDA DOCKET NO. 020507-TL**

**TWO REDACTED COPIES**

DOCUMENT NUMBER-DATE

05880 JUL-18

FPSC-COMMISSION CLERK

# REDACTED

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 020507-TL  
Staff's 2<sup>nd</sup> Set of Interrogatories  
May 21, 2003  
Item No. 24 **PUBLIC DISCLOSURE**  
Page 1 of 1

REQUEST: 1 On page 17, lines 3-4, of Mr. Ruscilli's direct testimony, he states that the  
2 number of lines served by BellSouth and BellSouth's market share  
3 decreased. Of the number of lines lost, on how many of the lines did  
4 BellSouth provide FastAccess? If the exact number is unknown, provide a  
5 reasonable approximation, and indicate such in your response.

RESPONSE: 6 BellSouth does not have the data to determine the number of lines lost by  
7 BellSouth on which BellSouth provided FastAccess.

8 The best approximation that BellSouth can provide is as follows:

9 In response to Item No. 41, BellSouth states that \*\*\* PROPRIETARY\*\*\*  
10 customers had both BellSouth FastAccess service and local voice service  
11 via a resold line on May 31, 2003. BellSouth would include these  
12 customers in its calculation of lines lost.

13 In addition, BellSouth requested certain information from MCI in  
14 discovery. In response to BellSouth's requests, MCI provided BellSouth  
15 with a list of Purchase Order Numbers (PONs) rejected from January 2002  
16 - December 12, 2002, which MCI contended were rejected because a  
17 customer could not migrate service to MCI because he or she had DSL  
18 service on his or her account. BellSouth sampled approximately 10% of  
19 the rejected PONs. Of this sample, approximately 18% of the lines had  
20 voice service with an ALEC.

RESPONSE PROVIDED BY: John A. Ruscilli, Senior Director  
BellSouth Telecommunications, Inc.  
675 W. Peachtree Street  
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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 020507-TL  
Staff's 2<sup>nd</sup> Set of Interrogatories  
May 21, 2003  
Item No. 41 **PUBLIC DISCLOSURE**  
Page 1 of 1

REQUEST: 1 How many customers are currently obtaining FastAccess service from  
2 BellSouth while obtaining local voice service from a reseller of BellSouth  
3 voice service?

RESPONSE: 4 **\*\*\*PROPRIETARY\*\*\*** customers had both FastAccess service with  
5 BellSouth and local voice service via a resold line on May 31, 2003.

RESPONSE PROVIDED BY: Eric Fogle, Director  
BellSouth Telecommunications, Inc.  
675 W. Peachtree Street  
Atlanta, GA 30375

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 020507-TL  
Staff's 2<sup>nd</sup> Set of Interrogatories  
May 21, 2003  
Item No. 65 **PUBLIC DISCLOSURE**  
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REQUEST: How many FastAccess customers did BellSouth have as of April 30, 2003.

RESPONSE: BellSouth had \*\*\*PROPRIETARY\*\*\* FastAccess customers on April  
30<sup>th</sup>, 2003.

RESPONSE PROVIDED BY: Eric Fogle, Director  
BellSouth Telecommunications, Inc.  
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Staff's 2<sup>nd</sup> Request for Production  
May 21, 2003  
Item No. 4

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