

ORIGINAL

Legal Department

Nancy B. White  
General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
305 347-5558

February 27, 2004

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Late-filed Deposition Exhibit No. 1 for Shelly W. Padgett and Exhibit No. 1 for A. Wayne Gray, which we ask that you file in the above-captioned docket.

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,

*Nancy B. White*  
Nancy B. White (att)

Enclosure

cc: Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Meredith Mays

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**CERTIFICATE OF SERVICE**  
**Docket No. 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and FedEx this 27<sup>th</sup> day of February 2004 to the following:

Adam Teitzman, Staff Counsel\*  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue, Ste. 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Matthew Feil (+)  
Scott Kassman  
FDN Communications  
2301 Lucien Way  
Suite 200  
Maitland, FL 32751  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

Joseph A. McGlothlin+⊗  
Vicki Gordon Kaufman+  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[jmclglothlin@mac-law.com](mailto:jmclglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents FCCA

Mr. Charles E. Watkins+  
1230 Peachtree Street, NE  
19th Floor  
Atlanta, GA 30309-3574  
Phone: (404) 942-3492  
Fax: (404) 942-3495  
Represents Covad  
[gwatkins@covad.com](mailto:gwatkins@covad.com)  
[jbelle@covad.com](mailto:jbelle@covad.com)

Nanette Edwards, Esq.+  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
Represent ITC^DeltaCom  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Ms. Donna C. McNulty+⊗  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd.,  
Suite 201  
Tallahassee, FL 32301-2960  
Phone No. 850- 219-1008  
Fax No. 850 219-1018  
Represents MCI WorldCom  
[donna.mculty@mci.com](mailto:donna.mculty@mci.com)

De O'Roark, Esq. (+)  
MCI WorldCom Communications, Inc (GA)  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Represents MCI WorldCom  
[de.oroark@mci.com](mailto:de.oroark@mci.com)

Floyd Self, Esq.+  
Norman H. Horton, Esq.~  
Messer Capareello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom  
Represents MCI  
Represents KMC  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

Tracy Hatch, Esq. \*\*  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper+⊗  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30043-8119  
Tel. No. (678) 985-6261  
Fax No.: (678) 985-6213  
Represents KMC  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

Richard A. Chapkis (+)  
Kimberly Caswell  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
Represents Verizon  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)

Susan S. Masterton, Esq. +  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
[jean.houck@btitelecom.net](mailto:jean.houck@btitelecom.net)

Jake E. Jennings +  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No.: 864 672-5877  
Fax No.: 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

Jon Moyle, Jr.  
Moyle Law Firm (Tall)  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: 681-8788  
Represents NuVox Communications Inc.  
Email: [jmoylejr@moylelaw.com](mailto:jmoylejr@moylelaw.com)

**Allegiance E-mail Only**  
[charles.gerkin@algx.com](mailto:charles.gerkin@algx.com)

Terry Larkin  
Allegiance Telecom, Inc.  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: (630) 522-6453  
[terry.larkin@algx.com](mailto:terry.larkin@algx.com)

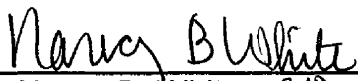
Jorge Cruz-Bustillo +  
Assistant General Counsel  
Supra Telecommunications  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Tel. No. (305) 476-4252  
Fax. No. (305) 443-1078  
[jorge.cruz-bustillo@stis.com](mailto:jorge.cruz-bustillo@stis.com)

Jonathan Audu \*\*  
Manager, Regulatory Affairs  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
Email: [jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

**AT&T by E-Mail only:**  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Bo Russell  
Nuvox Communications Inc.  
301 North Main Street  
Greenville, SC 29601-2171  
Phone: (864) 331-7323  
Email: [brussell@nuvox.com](mailto:brussell@nuvox.com)

J. Jeffry Wahlen  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

  
Nancy B. White (R)

**(+) signed protective agreement**  
**(\*) via Hand Delivery**  
**(\*\*) via electronic mail only**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 030852  
A. Wayne Gray  
Late Filed Deposition Exhibit 1  
Construction Moratorium

**REQUEST:** Are there any construction moratoriums in place for any of the locations or routes that BellSouth believes to have met the potential deployment requirement?

**RESPONSE:** BellSouth assumes the term “construction moratorium” to mean that either new or additional telecommunications facilities cannot be constructed at a building site or that additional telecommunications facilities cannot be constructed for all of part of a route between the central offices identified in the exhibits to the testimony of Dr. Aniruddha Banerjee.

As defined above, BellSouth does not maintain any centralized, aggregate lists that can be accessed to provide a definitive response to this issue. It is possible that at any given time a construction moratorium may exist; however, to examine the specifics of all central office routes and building locations would be a monumental task that would require BellSouth to individually poll every BellSouth engineer that has a geographical assignment for any building or central office route in the exhibits, which cannot be accomplished in the timeframes established for this proceeding. Moreover, the accuracy of any such response would apply only for a snapshot of time, which equates to the date and time the information was provided.

Typically, BellSouth only learns of a construction moratorium on a case-by-case basis when construction projects occur. For example, BellSouth may not learn of any limitation until after the necessary permits are sought from municipal or government permitting authorities. If the permitting authorities identify a construction moratorium, BellSouth’s engineers would then evaluate whether the job could be completed by routing facilities around a specific area or by modifying the timeframes of the project so that construction is targeted for a specific time to comply with any restrictions or moratoriums.

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 030852  
Shelley W. Padgett  
Late Filed Deposition Exhibit 1  
Conservative Algorithm Utilized by  
GeoResults

**REQUEST:** How is the conservative algorithm GeoResults uses to identify fiber-based loop facilities constructed? What is the definition of the conservative algorithm utilized by GeoResults?

**RESPONSE:** BellSouth does not have access to and has not been provided with the specific algorithms used by GeoResults, Inc., to develop their GeoLIT Plus Report. However, GeoResults has verbally provided BellSouth with a qualitative description of the methods used to determine where fiber-based loops terminate, which are described below.

As noted in Ms. Padgett's Direct Testimony, the GeoLIT Plus Report is based on proprietary analysis of the Telcordia CLONES Master Location Database. As stated in BellSouth's response to Staff's First Set of Interrogatories, Item No. 12, the descriptive information in CLONES is a primary source of data for GeoResults' analysis and the determination of where fiber-based equipment is located.

GeoResults' algorithms analyze the descriptive information from CLONES to determine where fiber equipment is installed and by which company, *when possible*. The GeoResults analysis utilizes key words in the description, such as "fiber," correlated with the network entity type defined as part of the CLLI code (reference the Telcordia document provided in response to Staff's First Set of Interrogatories, Item No. 12). BellSouth understands that GeoResults has developed a table of descriptive key words, including specific fiber equipment types by vendor, which would identify records as fiber-based. BellSouth also understands that GeoResults uses computer and manual techniques to employ their algorithms. However, some records contain sufficient information to determine clearly that fiber is available, but some records do not. Furthermore, GeoResults has indicated that their algorithms do not speculate about fiber equipment; the CLONES description must be clear and unambiguous in reflecting a fiber installation. As a result, the GeoLIT Report is dependent on what the owning company entered into CLONES and can be very conservative in identifying fiber-based installations.