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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Loop & Transport)*

Docket No. 03-00527

BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES TO MOMENTUM BUSINESS SOLUTIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests Momentum Business Solutions, Inc. ("Momentum") to provide answers in response to the following discovery requests in the time established by the Procedural Schedule provided by Director Jones on October 21, 2003.

DEFINITIONS

1. "You" and "your" refers to Momentum as well as any predecessors in interest, parent(s), subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Momentum.

2. "Affiliate" is defined as found in the Telecommunications Act of 1996. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1).

3. "Southeastern states" include the following states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

4. "DS3 transport" refers to transmission facilities with a total digital signal speed of 44.736 Mbps provided over various transmission media including, but not limited to, fiber optics, coaxial cable, wireless, radio, and power line facilities.

5. "DS3 loop facilities" refer to a digital loop having a total signal speed of 44.736 megabytes per second provided over various transmission media including, but not limited to, fiber optics, coaxial cable, wireless, radio, and power line facilities.

6. "DS1 transport" refers to transmission facilities with a total digital signal speed of 1.544 Mbps provided over various transmission media including, but not limited to, copper, fiber optics, coaxial cable, wireless, radio, and power line facilities.

7. "DS1 loop facilities" refer to a digital loop having a total signal speed of 1.544 megabytes per second provided over various transmission media including, but not limited to, two-wire and four-wire copper, coaxial cable, fiber optics, wireless, radio, and power line facilities.

8. "Dark fiber transport" refers to optical transmission facilities without activated electronics, through which no light is transmitted and no signal is carried.

9. "Dark fiber" refers to optical transmission facilities without attached electronics, through which no light is transmitted and no signal is carried.

10. "Optronics" refers to equipment, materials, and devices that are attached to dark fiber for the purpose of lighting the fiber to carry a signal to serve customers.

11. "IRU" refers to an indefeasible right of use, or a type of arrangement that conveys a right to use particular facilities for a specified amount of time that cannot be arbitrarily changed or altered.

12. "High capacity" refers to transmission facilities with a total digital signal speed of DS1 or higher.

13. "CLLI code" refers to the Common Language Location Identifier that is an 11-character alphanumeric code that identifies a specific physical location or specific piece of equipment at a physical location.

14. "ILEC CO" refers to BellSouth central offices.

15. "ILEC Wire Center" refers to a BellSouth building housing one or more switches.

16. "ILEC" refers to BellSouth.

17. "RSAG valid address" refers to the address of each customer location as it appears in RSAG (Regional Street Address Guide) or in any other telecommunications industry database, if known.

INTERROGATORIES

1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Form for Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

2. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

Sample Form for Response to Question 2									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

3. Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Sample Form for Response to Question 3									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

4. For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)

b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
f. Whether you are able to immediately provide transport along the particular route.
g. The capacity deployed and the capacity active on the route as of September 30, 2003.

5. For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
f. Whether you are willing and able immediately to provide transport along the particular route.
g. The capacity deployed and the capacity active on the route as of September 30, 2003.

6. For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet[1] related to both self-

[1] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
b. The name of the carrier or company from whom you received or purchased the transport;
c. Whether you are operationally ready to provide transport using these facilities; and
d. The capacity deployed and the capacity active on the route as of September 30, 2003.

7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Response Form - Question 8: Self-provided facilities for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

9. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access,

other unbundled network elements or other services obtained from third parties, should not be included in this response.

Sample Response Form - Question 9: Self-provided facilities offered on wholesale basis									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

10. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

Sample Response Form-Question 10: 3rd Party facilities leased for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

11. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

Sample Response Form-Question 11: 3rd Party facilities leased for reselling as wholesale service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

12. For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets)[2] identifying:

a. The RSAG valid address of each customer location.
b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)

[2] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

13. For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets),[3] identifying:

a. The RSAG valid address of each customer location.
b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Respectfully submitted,

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[3] Spreadsheet sent via electronic mail; hard copies provided via U.S. Mail.

BELLSOUTH TELECOMMUNICATIONS, INC.

By: Joelle Phillips w/ permission (ch)

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Self-Provisioned Retail Loop Information Spreadsheet

State:

Customer Address			CLLI from which loop extends	Reporting Company Name	Facility wholly owned (Yes, No)	If No, third party facility vendor	Dark Fiber from BellSouth on IRU basis (Yes, No)	Can serve all at location (Yes, No)	If No, Indicate line # Ref, Pg 2	Capacity In-Service		Total Capacity Deployed	
RSAG Valid Address	City	Zip								DS3	Fibers	DS3	Fibers
(Street name and number, directional)													

Self-Provisioned Retail Loop Information Spreadsheet page 2
Retail Loop Premises Access

Customer Address Address City Zip	Barrier to access	Steps taken to remove barrier
(Street name and number, directional)		

Wholesale Loop Information Spreadsheet

State:

Customer Address											Capacity In-Service			Total Capacity Deployed		
RSAG Valid Address	City	Zip	CLLI from which loop extends	Reporting Company Name	Facility wholly owned (Yes, No)	If No, third party facility vendor	Dark Fiber from BellSouth on IRU basis (Yes, No)	Can serve all at location (Yes, No)	If No, Indicate line # Ref, Pg 2	Access at technically feasible point (Yes, No)	DS1	DS3	Fibers	DS1	DS3	Fibers
(Street name and number, directional)																

Wholesale Loop Information Spreadsheet page 2
Wholesale Loop Premises Access

Customer Address Address City Zip	Barrier to access	Steps taken to remove barrier
(Street name and number, directional)		

Question 4 Spreadsheet: Self-provisioned Transport Information

State:

Wire Center "A"		Wire Center "Z"							Capacity In-Service		Capacity Deployed	
CLLI Code	Access to Collocation (Yes, No)	CLLI Code	Access to Collocation (Yes, No)	Reporting Company Name	Facility wholly owned (Yes, No)	If No, third party facility vendor	Dark Fiber on IRU basis from BellSouth (Yes, No)	Facilities are operationally ready (Yes, No)	DS3	Fibers	DS3	Fibers

Question 4 Spreadsheet Self-provisioned Transport Page 2: Collocation Access

Wire Center "A"			Wire Center "Z"		
Wire Center CLLI code	Collocation ACTL CLLI	Collocation "owner"	Wire Center CLLI code	Collocation ACTL CLLI	Collocation "owner"

Question 5 Spreadsheet: Wholesale Transport Information Spreadsheet

State:

Wire Center "A"		Wire Center "Z"		Reporting Company Name	Facility wholly owned (Yes, No)	If No, third party facility vendor	Dark Fiber on IRU basis from BellSouth (Yes, No)	Facilities operationally ready (Yes, No)	Capacity In-Service			Capacity Deployed		
CLLI Code	Access to Collocation (Yes, No)	CLLI Code	Access to Collocation (Yes, No)						DS1	DS3	Dark Fibers	DS1	DS3	Dark Fibers

Question 5 Wholesale Transport Information Spreadsheet Page 2: Collocation Access

Wire Center "A"			Wire Center "Z"		
Wire Center CLLI code	Collocation ACTL CLLI	Collocation "owner"	Wire Center CLLI code	Collocation ACTL CLLI	Collocation "owner"

CERTIFICATE OF SERVICE

I hereby certify that on October 27. 2003, the foregoing document was served on the parties of record, via the method indicated:

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