BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-326-C

IN RE:

Analysis of Continued Availability of Unbundled Local Switching for Mass Market Customers Pursuant To the Federal Communication Commission's Triennial Review Order	)))))	**ITC^DELTACOM'S RESPONSE TO BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROATORIES TO ITC^DELTACOM AND BTI**

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom and BTI Corporation (hereinafter "ITC^DeltaCom"), pursuant to the Joint Motion for Initial Procedural Order filed by BellSouth and CompSouth on November 12, 2003 hereby submits the following Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories to ITC^DeltaCom.

RESPONSES TO INTERROGATORIES

1. Identify each switch owned by Company that Company uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the state and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: Joe Gillenwaters/Steve Brownworth and William Hopton

2. For each switch identified in response to Interrogatory No. 1, please:

a. provide the Common Language Location Identifier ("CLLI") code of the switch;

b. provide the street address, including the city and state in which the switch is located;

c. identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

d. state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

e. state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and

f. provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG") or explain why the switch is not identified in the LERG.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Regarding subpart (f), this information is either contained in the LERG and is public information, or a description is provided.

Response Provided by: Joe Gillenwaters/Steve Brownworth and William Hopton

3. Identify any other switch not previously identified in Interrogatory No. 1 that Company uses to provide a qualifying service anywhere in South Carolina, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by Company either on an unbundled or resale basis.

RESPONSE:

N/A.

Response Provided by: Joe Gillenwaters/Steve Brownworth

4. For each switch identified in response to Interrogatory No. 3, please:

a. identify the person that owns the switch;

b. provide the Common Language Location Identifier ("CLLI") code of the switch;

c. provide the street address, including the city and state in which the switch is located;

d. identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

e. describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;

f. identify all documents referring or relating to the rates, terms, and conditions of Company's use of the switch; and

g. provide information relating to the switch as contained in Telcordia's LERG or explain why the switch is not identified in the LERG.

RESPONSE:

N/A.

5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: Denise Henderson/Elisha Kusen and William Hopton

6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

See response to Interrogatory No. 5.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

a. The number of end user customers to whom you provide one (1) voice-grade equivalent line;

b. The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

c. The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

d. The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

e. The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

f. The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

g. The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

h. The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

i. The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

j. The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

k. The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

l. The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

m. The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

See response to Interrogatory No. 5 for information related to ITC^DeltaCom. Public Service Commission for information related to ITC^DeltaCom.

NOTE: An end user may have lines in each category – resale, UNEP, and facilities. End user numbers can, in this instance, be triple-counted.

The data is not available in the format requested for BTI. BTI does not track data based on the number of voice-grade equivalent lines provided to end user customers and it would be highly manually intensive to mine this data.

Response Provided by: Denise Henderson and Jean Houck

8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE:

N/A.

9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

RESPONSE:

N/A.

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

a. The number of end user customers to whom you provide one (1) voice-grade equivalent line;

b. The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

c. The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

d. The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

e. The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

f. The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

g. The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

h. The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

i. The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

j. The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

k. The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

l. The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

m. The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

N/A.

11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in South Carolina using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: Denise Henderson/Elisha Kusen and Thomas Crosby

12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: Denise Henderson/Elisha Kusen and Thomas Crosby

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

a. The number of end user customers to whom you provide one (1) voice-grade equivalent line;

b. The number of end user customers to whom you provide two (2) voice-grade equivalent lines;

c. The number of end user customers to whom you provide three (3) voice-grade equivalent lines;

d. The number of end user customers to whom you provide four (4) voice-grade equivalent lines;

e. The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

f. The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

g. The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;

h. The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;

i. The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

j. The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;

k. The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

l. The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

m. The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

The data is not available in the format requested for BTI. BTI does not track data based on the number of voice-grade equivalent lines provided to end user customers and it would be highly manually intensive to mine this data.

Response Provided by: Denise Henderson/Elisha Kusen and Thomas Crosby

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

a. Provide the Common Language Location Identifier ("CLLI") code of the switch;

b. Provide the street address, including the city and state in which the switch is located;

c. Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

d. State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

e. State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and

f. Identify all documents referring or relating to the rates, terms, and conditions of Company's provision of switching capability.

RESPONSE:

No.

Response Provided by: Steve Brownworth

15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, seeks trade secrets, and is not reasonably calculated to lead to the discovery of admissible evidence.

16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets.

17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets.

18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in South Carolina? If the answer to this Interrogatory is in the affirmative, please:

a. provide the Common Language Location Identifier ("CLLI") code of the switch;

b. provide the street address, including the city and state in which the switch is located;

c. identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

d. state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;

e. state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts;

f. identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in South Carolina.

RESPONSE:

Assuming ISP-bound traffic is a qualifying service, then the answer is no, ITCD does not have any switches that are not being used to provide a qualifying service in South Carolina. To the extent ISP-bound traffic is considered not to be a qualifying service, see response to Interrogatory No. 1. All Unisphere switches are used to separate ISP-bound traffic from voice traffic. Therefore, the Unisphere switches are not configured for voice grade equivalent lines.

Response Provided by: Joe Gillenwaters

19. Identify each MSA in South Carolina where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: Nanette Edwards

20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE:

Descriptions of local service offerings are contained in the Company's Tariffs that are publicly filed with the South Carolina Public Service Commission.

Response Provided by: Nanette Edwards and Jean Houck

22. Identify each MSA in South Carolina where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

ITC^DeltaCom objects on the grounds that this information is not relevant and is not likely to lead to the discovery of admissible evidence, and this information is not readily available in the format sought.

23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE:

ITC^DeltaCom objects on the grounds that this information is not relevant and is not likely to lead to the discovery of admissible evidence, and this information is not readily available in the format sought.

24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE:

ITC^DeltaCom objects on the grounds that this information is not relevant and is not likely to lead to the discovery of admissible evidence, and this information is not readily available in the format sought.

25. Please state the total number of end users customers in the State of South Carolina to whom you only provide qualifying service.

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

Response Provided by: James Pearsall and Jean Houck

26. For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets. Additionally, ITC^DeltaCom does not have the information requested in the manner requested. However, pursuant to a discovery settlement agreement with BellSouth, ITC^DeltaCom will endeavor to provide additional information subject to the protective agreement.

27. For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

RESPONSE:

ITC^DeltaCom does not have the information requested in the manner requested.

28. Please state the total number of end users customers in the State of South Carolina to whom you only provide non-qualifying service.

RESPONSE:

Per BellSouth discovery agreement, this question is withdrawn.

29. For those end user customers to whom you only provide non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

See Response to Interrogatory No. 28.

30. Please state the total number of end users customers in the State of South Carolina to whom you provide both qualifying and non-qualifying service.

RESPONSE:

ITC^DeltaCom objects on the grounds that this information is not relevant or necessary, and this information is not readily available in the format sought. Not withstanding its objections, see response to Interrogatory No. 25.

31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets. Additionally, ITC^DeltaCom does not have the information requested in the manner requested.

32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of South Carolina, please state the average number of lines that you provide each such end user customer.

RESPONSE:

ITC^DeltaCom does not have the information requested in the manner requested.

33. Please provide a breakdown of the total number of end user customers served by Company in South Carolina by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

RESPONSE:

Upon issuance of a Protective Order by the South Carolina Public Service Commission, this Response, deemed confidential, will be forwarded pursuant to said Order.

See response to Interrogatory Nos. 7 and 13. The classifications used are residential and business.

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE:

ITC^DeltaCom objects on the grounds that this request is overly broad, unduly burdensome, and seeks trade secrets. Not withstanding its objections and pursuant a discovery settlement agreement with BellSouth, ITC^DeltaCom will endeavor to provide supplemental information.

Response Provided by: Nanette Edwards

35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE:

See response to Interrogatory No. 34.

36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

RESPONSE:

Unknown. We are unable to calculate our share of the local exchange market in South Carolina. The information needed to calculate market share is not publicly available. However, not withstanding its objections, and pursuant to a discovery settlement agreement with BellSouth. ITC^DeltaCom's *estimated* share of the local exchange market throughout the BellSouth 9-state region will be provided when the South Carolina Public Service Commission issues its Protective Order .

Response Provided by: Randy Tucker/Elisha Kusen

37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in South Carolina.

RESPONSE:

ITC^DeltaCom does not have documents responsive for South Carolina. Not withstanding its objections, and pursuant to a discovery settlement agreement with BellSouth, ITC^DeltaCom will endeavor to provide supplemental information.

38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in South Carolina.

RESPONSE:

ITC^DeltaCom does not have documents responsive for South Carolina. Not withstanding its objections, and pursuant to a discovery settlement agreement with BellSouth, ITC^DeltaCom will endeavor to provide supplemental information.

39. Describe how the marketing organization that is responsible for marketing qualifying service in South Carolina is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in South Carolina, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

RESPONSE:

ITC^DeltaCom objects that this information are trade secrets.

40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

RESPONSE:

It depends on the customer's needs and requests for services. In the end, the customer makes the decision.

Response Provided By: Elisha Kusen

41. Is there a typical or average number of DS0s at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

RESPONSE:

See Response to Interrogatory No. 40.

42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

RESPONSE:

ITC^DeltaCom does not have a complete list of what additional equipment might be required. ITC^DeltaCom will update this response accordingly. BTI does not provide equipment to customers in South Carolina.

Response Provided by: Elisha Kusen and Jean Houck

43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

RESPONSE:

ITC^DeltaCom does not use a cost of capital in evaluating whether to offer a qualifying service in a particular geographic market.

Response Provided By: Kevin McEacharn

44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

RESPONSE:

See Response to Interrogatory No. 43.

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

RESPONSE:

The FCC's TRO specifically contemplates the consideration of financial and related information of an efficient "model" competitor and not that of ITC^DeltaCom or any other particular competitor.

ITC^DeltaCom's determination of whether to offer a "qualifying service in a particular geographic market" and the time periods involved in such evaluation are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In an effort to be responsive, ITC^DeltaCom normally uses a three year time period for product evaluation for business services.

Response Provided by: Elisha Kusen

46. Provide your definition of sales expense as that term is used in your business.

RESPONSE:

ITC^DeltaCom uses that term as defined by GAAP.

Response Provided By: Kevin McEacharn

47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE:

ITC^DeltaCom does not use sales expense in evaluating whether to offer a qualifying service in a particular geographic market.

Response Provided By: Kevin McEacharn

48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

RESPONSE:

See response to Interrogatory No. 46.

49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE:

ITC^DeltaCom does not use G&A expense in evaluating whether to offer a qualifying service in a particular geographic market.

Response Provided By: Kevin McEacharn

50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for Company in each state in BellSouth's region.

RESPONSE:

Upon information and belief, BellSouth is in possession of documents and other information requested in Interrogatory Nos. 50 and 51.

Response Provided by: Nanette Edwards

51. For each individual hot cut identified in response to Interrogatory No. 50, state:

i. Whether the hot cut was coordinated or not;

ii. If coordinated, whether the hot cut occurred as scheduled;

iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, Company, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;

iv. If there was a problem with the hot cut, state whether Company complained in writing to BellSouth or anyone else.

RESPONSE:

See Response to Interrogatory No. 50.

52. Does Company have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE:

ITC^DeltaCom's preferred process is one that is electronic for all components, i.e. provisioning, billing, and scheduling and is seamless to the customer.

Response provided by: Mary Conquest

53. Does Company have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE:

See Response to Interrogatory No. 52.

54. If Company has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

RESPONSE:

See Response to Interrogatory No. 52.

55. If Company has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in Company's process that differs from BellSouth's process.

RESPONSE:

See Response to Interrogatory No. 52.

56. Does Company have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE:

No.

Response Provided By: Steve Brownworth

57. Does Company have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE:

ITC^DeltaCom does not have a specific batch rate at this time. However, ITC^DeltaCom believes the rate should be cost-based and non-discriminatory.

Response provided by: Jerry Watts

58. What is the largest number of individual hot cuts that Company has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

RESPONSE:

The information requested is in the possession, custody and control of BellSouth.

Response provided by: Tim Ford

59. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE:

ITC^DeltaCom is participating in the "hot cut" workshops sponsored by the Commissions; however, ITC^DeltaCom has not reviewed all processes being proposed.

Response provided by: Mary Conquest

60. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

No.

Response provided by: Jerry Watts

61. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE:

See Response to Interrogatory No. 59.

Response provided by: Mary Conquest

62. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

No.

Response provided by: Jerry Watts

63. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE:

Unknown. See Response to Interrogatory No. 59.

Response provided by: Mary Conquest

64. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

Unknown. ITC^DeltaCom does not have sufficient information to respond at this time.

Response provided by: Jerry Watts

65. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to Company or that Company believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE:

Unknown. See Response to Interrogatory No. 59.

Response provided by: Mary Conquest

66. Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to Company? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE:

Unknown.

Response provided by: Jerry Watts

67. Does Company order coordinated or non-coordinated hot cuts?

RESPONSE:

ITC^DeltaCom orders both. BTI does not perform hot cuts with BellSouth in South Carolina.

Response Provided By: Mary Conquest and Jean Houck

68. Does Company use the CFA database?

RESPONSE:

Yes.

Response provided by: Mary Conquest

69. Identify every issue related to BellSouth's hot cut process raised by Company at the South Carolina CLEC collaborative since October 2001.

RESPONSE:

This information is public and is easily available to BellSouth, and is in BellSouth's possession.

Response provided by: Mary Conquest

70. What is the appropriate volume of loops that you contend the South Carolina Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

The appropriate volume of loops must meet the operational and economic models as defined by the FCC and the TRO. Furthermore, the volume of loops must be established such that the quality of service to the consumer is not impacted.

Response provided by: Mary Conquest

71. What is the appropriate process that you contend the South Carolina Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

The appropriate process to use in establishing a batch hot cut process is one that passes the operational and economic models as defined by the FCC and the TRO. Furthermore, the process must be established such that the quality of service to the end user is not impacted.

Response provided by: Mary Conquest

72. If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE:

ITC^DeltaCom is investigating and will update its response.

Response provided by: Mary Conquest

73. If Company disagrees with BellSouth's bulk hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE:

ITC^DeltaCom's concerns include but are not limited to the following:

1) **Length and intervals**
2) **Recovery of plant unclear**
3) **Service outages**
4) **Added cost when outside normal work hours**
5) **While dial tone is tested on plant test date, no guarantee exists it will be available on due date.**
6) **24/7 support available**

Response provided by: Mary Conquest

74. Identify by date, author and recipient every written complaint Company has made to BellSouth regarding BellSouth's hot cut process since October 2001.

RESPONSE:

See Response to Interrogatory No. 69. Furthermore, BellSouth has in its possession each and every report that ITC^DeltaCom's executives provided to BellSouth executives regarding the BellSouth hot cut performance.

Response Provided By: Nanette Edwards

75. How many unbundled loops does Company contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

RESPONSE:

To establish a *per state* number would posture CLEC against CLEC when competing for resources. ITC^DeltaCom feels there should be no limit.

Response provided by: Mary Conquest

76. What is the appropriate information that you contend the South Carolina Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

In addition to the requirements set forth in the Triennial Review Order, ITC^DeltaCom believes that the NCUC must consider (1) the quality of service impacts to the consumer of batch hot cuts; (2) the volume/capacity of companies such as Verisign/TSI for handling port orders; (3) the volume/capacity of ports that Neustar can handle; and (4) the volume/capacity that the individual CLEC can perform. This is not an exhaustive list of issues that must be reviewed but certainly represents several of ITC^DeltaCom's concerns.

Response provided by: Mary Conquest

77. What is the average completion interval metric for provision of high volumes of loops that you contend the South Carolina Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

The provision of high volumes of loops must be, at a minimum, equal to the order completion interval for UNE-P; otherwise, there will be no real competition in the mass market place.

Response provided by: Jerry Watts

78. What are the rates that you contend the South Carolina Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

Rates must be compliant with the FCC UNE Pricing Rules. Also, rates must be set appropriately to allow CLECs to overcome the economic barriers associated with the hot cut process.

Response provided by: Jerry Watts

79. What are the appropriate product market(s) that you contend the South Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

ITC^DeltaCom does not have sufficient information at this time to answer.

Response provided by: Jerry Watts

80. What are the appropriate geographic market(s) that you contend the South Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

See Response to Interrogatory No. 79.

Response provided by: Jerry Watts

81. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

RESPONSE:

Yes. See ITC^DeltaCom ex parte filing with the FCC on January 24, 2003 in Docket No. 98-147.

Response provided by: Jerry Watts

82. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

RESPONSE:

Yes. See ITC^DeltaCom ex parte filing with the FCC on January 24, 2003 in Docket No. 98-147.

Response provided by: Jerry Watts

83. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the South Carolina Public Service Commission should consider in establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE:

Unknown at this time. The answer is determined by using the economic and operational impairment analysis.

Response provided by: Jerry Watts

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12/17, 2003

CERTIFICATE OF SERVICE

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC^DeltaCom, do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

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