

**Illinois Commerce Commission  
Docket No. 09-0052  
Staff Data Request 2.04**

*Admitted*

**Request:**

In the Parties' Joint Response to the Administrative Law Judge Data Request 2, Explanation of the Champaign LATA Interconnection Dispute (ALJ Data Request Ex. 1.b) it is stated that "[t]hese multiplexers then each break down a DS3 into 28 individual DS1's that in turn connect to the various Illinois Bell and Verizon switches as depicted in the diagram." For each of the two respective Illinois Bell-owned M13 multiplexers, please explain whether the multiplexer, in turn, connects to Illinois Bell switches, to Verizon switches, and/or to a DS1 or DS1s that carry 911 trunks. (In particular, Staff is seeking to identify for each multiplexer whether the multiplexer is used for a unique purpose (e.g., to connect to DS1s that, in turn, connect exclusively to Verizon switches) or for mixed purposes (e.g., used to connect to DS1s that, in turn, connect to Illinois Bell and Verizon switches).

**Response:**

IBT objects to this request on the grounds that it is vague and ambiguous, in that it does not specify a time period about which it seeks information. Without waiving its objection, IBT states as follows in response to this request:

810 T3: Currently, 13 of the DS1s on this DS3 connect to IBT switches, 9 connect to Verizon switches, and the remaining DS1s are unused. As of March 2009, 16 of the DS1s connected to IBT switches and 12 connected to Verizon switches.

816 T3: Currently, 2 of the DS1s on this DS3 connect to IBT switches, 2 carry 911 trunks for BitWise to an IBT selective router, 5 are used by a carrier other than BitWise, and the remaining DS1s are unused. As of March 2009, 7 of the DS1s connected to IBT switches, 13 connected to Verizon switches, 2 carried 911 trunks for BitWise to an IBT selective router, 5 were used by a carrier other than BitWise, and 1 was unused.

**OFFICIAL FILE**

I.C.C. DOCKET NO. 09-0052

AT&T Exhibit No. 2.2(a)

Witness Neumann

Date 8-10-09 Reporter ARC