

Edward T. Depp
502-540-2347
tip.depp@dinsmore.com

October 14, 2011

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PUBLIC SERVICE
COMMISSION

VIA HAND-DELIVERY

Hon. Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40602-0615

Re: *In the Matter of: An investigation into the traffic dispute between Windstream Kentucky East, LLC, Brandenburg Telephone Company and MCIMetro Access Transmission Services, LLC d/b/a Verizon Access, Commonwealth of Kentucky, Case No. 2008-00203*

Dear Mr. Derouen:

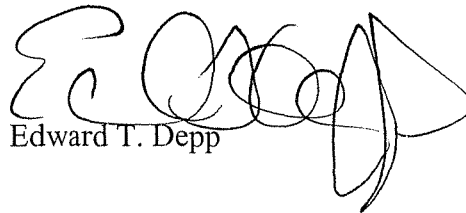
Enclosed for filing in the above-referenced case, please find one original and eleven (11) copies each of the Supplemental Data Requests to Windstream Kentucky East, LLC and MCIMetro Access Transmission Services LLC, d/b/a Verizon Access Transmission Services on Behalf of Brandenburg Telephone Company.

Please file-stamp one copy and return them to our delivery person.

Thank you, and if you have any questions, please call me.

Sincerely,

DINSMORE & SHOHL LLP



Edward T. Depp

ETD/kwi
Enclosures
cc: All parties of record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC)
DISPUTE BETWEEN WINDSTREAM)
KENTUCKY EAST, LLC, BRANDENBURG)
TELEPHONE COMPANY AND MCIMETRO)
ACCESS TRANSMISSION SERVICES, LLC)
D/B/A VERIZON ACCESS)

CASE NO. 2008-00203

**BRANDENBURG TELEPHONE COMPANY'S SUPPLEMENTAL DATA REQUESTS
TO
MCIMETRO ACCESS SERVICES, LLC, D/B/A VERIZON ACCESS**

Brandenburg Telephone Company ("Brandenburg Telephone"), by counsel, and pursuant to the Public Service Commission of the Commonwealth of Kentucky's (the "Commission") September 15, 2011 order in this matter, hereby propounds the following supplemental data requests upon MCImetro Access Transmission Services LLC, d/b/a Verizon Access Transmission Services ("MCImetro"). In light of the abbreviated procedural schedule in this matter, in the event MCImetro believes a complete answer to any of these initial data requests will require the disclosure of confidential data or is otherwise objectionable, please notify counsel to Brandenburg Telephone sufficiently in advance of the date such responses are due so that appropriate interim arrangements can be made pending Commission ruling upon any motion for confidential treatment or motion for protective order that MCImetro may believe is necessary.

REQUEST NO. 1: To supplement your response (both your written answer and any documents produced) to Request for Data No. 35, served by Brandenburg Telephone on July 17,

2008, identify the monthly volume of traffic that MCImetro has delivered (over Windstream facilities) to Brandenburg Telephone during each month since your answer to that data request.

RESPONSE:

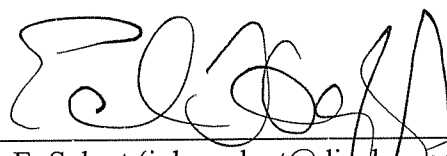
REQUEST NO. 2: To supplement your response (both your written answer and any documents produced) to Request for Data No. 36, served by Brandenburg Telephone on July 17, 2008, identify the monthly volume of traffic that MCImetro has received (over Windstream facilities) from Brandenburg Telephone during each month since your answer to that data request.

RESPONSE:

REQUEST NO. 3: Supplement your responses (both your written answers and any documents produced) to all other Requests for Data served by Brandenburg Telephone on July 17, 2008 or March 16, 2010.

RESPONSE:

Respectfully submitted,



John E. Selent (john.selent@dinslaw.com)
Edward T. Depp (tip.depp@dinslaw.com)
Holly C. Wallace (holly.wallace@dinslaw.com)

DINSMORE & SHOHL LLP

1400 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202
Telephone: (502) 540-2300
Fax: (502) 585-2207

Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

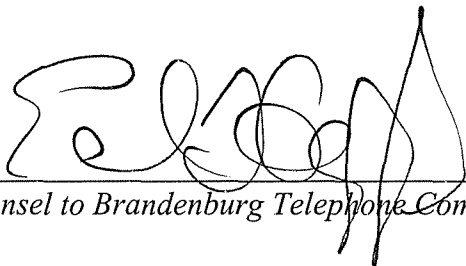
I hereby certify that a true and accurate copy of the foregoing was served on the following by first-class United State mail, sufficient postage prepaid, this 14th day of March, 2011.

Bruce F. Clark Esq.
Stites & Harbison, PLLC
421 West Main Street
P.O. Box 634
Frankfort KY 40602-0634

Counsel to Windstream

Douglas F. Brent Esq.
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville KY 40202-2874

Counsel to MCI metro



Counsel to Brandenburg Telephone Company

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC)	
DISPUTE BETWEEN WINDSTREAM)	
KENTUCKY EAST, LLC, BRANDENBURG)	CASE NO. 2008-00203
TELEPHONE COMPANY AND MCIMETRO)	
ACCESS TRANSMISSION SERVICES, LLC)	
D/B/A VERIZON ACCESS)	

**BRANDENBURG TELEPHONE COMPANY'S SUPPLEMENTAL DATA REQUESTS
TO
WINDSTREAM KENTUCKY EAST, LLC**

Brandenburg Telephone Company ("Brandenburg Telephone"), by counsel, and pursuant to the Public Service Commission of the Commonwealth of Kentucky's (the "Commission") September 15, 2011 order in this matter, hereby propounds the following supplemental data requests upon Windstream Kentucky East, LLC ("Windstream"). In light of the abbreviated procedural schedule in this matter, in the event Windstream believes a complete answer to any of these initial data requests will require the disclosure of confidential data or is otherwise objectionable, please notify counsel to Brandenburg Telephone sufficiently in advance of the date such responses are due so that appropriate interim arrangements can be made pending Commission ruling upon any motion for confidential treatment or motion for protective order that Windstream may believe is necessary.

REQUEST NO. 1: Supplement your response (both your written answer and any documents produced) to Request for Data No. 13, served by Brandenburg Telephone on July 17, 2008:

Explain in detail the basis for your claim that Windstream is entitled to compensation for the allegedly unauthorized use of its network by Brandenburg and/or MCImetro. In conjunction with this explanation, produce all cost studies, calculations, and other documentation that supports any compensation you seek from Brandenburg and/or MCImetro, and identify the amount of compensation owed by each of Brandenburg and MCImetro.

RESPONSE:

REQUEST NO. 2: Supplement your response (both your written answer and any documents produced) to Request for Data No. 14, served by Brandenburg Telephone on July 17, 2008:

Explain in detail the basis for your claim that Windstream is entitled to interest payments for the allegedly unauthorized use of its network by Brandenburg and/or MCImetro. In conjunction with this explanation, produce all cost studies, calculations, and other documentation that supports any compensation you seek from Brandenburg and/or MCImetro, and identify the amount of compensation owed by each of Brandenburg and/or MCImetro.

RESPONSE:

REQUEST NO. 3: Supplement your response (both your written answer and any documents produced) to Request for Data No. 14, served by Brandenburg Telephone on March 16, 2010:

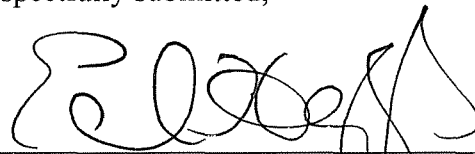
To the extent not already produced, produce all documentation that Windstream alleges supports its calculation of the total amount of compensation owed to it by Brandenburg Telephone.

RESPONSE:

REQUEST NO. 4: Supplement your responses (both your written answers and any documents produced) to all other Requests for Data served by Brandenburg Telephone on July 17, 2008 or March 16, 2010.

RESPONSE:

Respectfully submitted,



John E. Selent (john.selent@dinslaw.com)
Edward T. Depp (tip.depp@dinslaw.com)
Holly C. Wallace (holly.wallace@dinslaw.com)

DINSMORE & SHOHL LLP

1400 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202
Telephone: (502) 540-2300
Fax: (502) 585-2207

Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

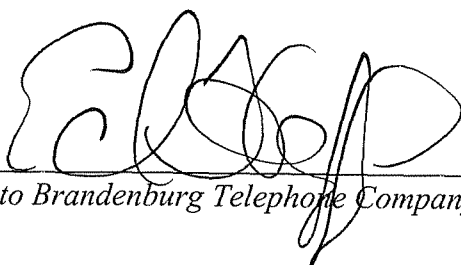
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Counsel to Windstream

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2000 PNC Plaza
500 West Jefferson Street
Louisville KY 40202-2874

Counsel to MCImetro



Counsel to Brandenburg Telephone Company