



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

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MAY 30 2008

PUBLIC SERVICE
COMMISSION

May 29, 2008

VIA FEDERAL EXPRESS

Hon. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

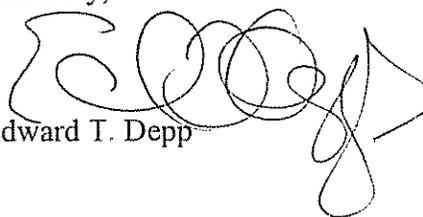
***Re: In the Matter of: South Central Telcom LLC v. BellSouth
Telecommunications, Inc., Case No. 2006-00448.***

Dear Ms. Stumbo:

We are enclosing one original and eleven (11) copies of South Central Telcom LLC's Initial Requests for Information, Requests for Admission, and Requests for Production of Documents to BellSouth Telecommunications, Inc. for filing with the Public Service Commission of the Commonwealth of Kentucky. Please file-stamp one copy and return it to us in the enclosed self-addressed stamped envelope.

Thank you, and if you have any questions with regard to this matter, please call me.

Sincerely,


Edward T. Depp

ETD/lb

cc: Max Phipps (w/encl.)
Donnie Bennett (w/encl.)
Eileen Bodamer (w/encl.)
John E. Selent, Esq. (w/o encl.)

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAY 30 2008
PUBLIC SERVICE
COMMISSION

In the Matter of:

SOUTH CENTRAL TELCOM LLC)	
Complainant)	
)	
v.)	Case No. 2006-00448
)	
BELLSOUTH TELECOMMUNICATIONS,)	
INC.)	
Defendant)	
)	

**SOUTH CENTRAL TELCOM LLC'S INITIAL
REQUESTS FOR INFORMATION, REQUESTS FOR ADMISSION,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO BELLSOUTH TELECOMMUNICATIONS, INC.**

South Central Telcom LLC ("South Central"), by counsel, and pursuant to the May 21, 2008 procedural order entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter, hereby propounds the following requests for information, requests for admission, and requests for production of documents (collectively "Discovery Requests") upon BellSouth Telecommunications, Inc. ("BellSouth"). The Discovery Requests shall be answered in accordance with the Commission's Order of May 21, 2008.

I. REQUEST FOR INFORMATION

1. Please identify the nature (for example, "local," "long distance," "non-optional EAS," "optional EAS," etc.) of all traffic that BellSouth exchanges with South Central.

RESPONSE:

2. Please provide a complete and detailed description of the facilities over which each type of traffic identified in response to Request for Information No. 1 is exchanged between the parties.

RESPONSE:

3. Please identify all BellSouth exchanges that are rated locally to any South Central exchanges.

RESPONSE:

4. Please identify all BellSouth exchanges that are subject to any non-optional EAS calling arrangements between the parties.

RESPONSE:

5. Please identify the date(s) upon which BellSouth requested interconnection with South Central.

RESPONSE:

6. Please identify the legal authority by which BellSouth made any such request(s) identified in response to Request for Information #4.

RESPONSE:

II. REQUEST FOR ADMISSION

1. Please admit or deny that BellSouth exchanges only access traffic with South Central.

RESPONSE:

2. Please admit or deny that BellSouth exchanges no local traffic with South Central.

RESPONSE:

3. Please admit or deny that BellSouth exchanges no non-optional EAS traffic with South Central.

RESPONSE:

III. REQUEST FOR PRODUCTION OF DOCUMENTS

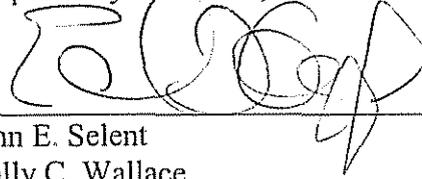
1. Please produce any and all documents by which BellSouth requested interconnection with South Central.

RESPONSE:

2. Please produce any and all other documents evidencing, relating or referring to any request for information and/or request for admission above.

RESPONSE:

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John E. Selent", written over a horizontal line.

John E. Selent

Holly C. Wallace

Edward T. Depp

DINSMORE & SHOHL LLP

1400 PNC Plaza

500 West Jefferson Street

Louisville, Kentucky 40202

(502) 540-2300 (telephone)

(502) 585-2207 (fax)

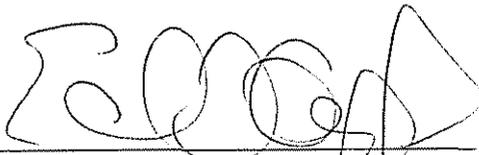
Counsel to South Central Telecom LLC

CERTIFICATE OF SERVICE

I hereby certify a true and accurate copy of the foregoing was served on the following individuals by first-class United States Mail, sufficient postage prepaid, on the 30th day of May, 2008:

Mary K. Keyer
General Counsel/Kentucky
601 W. Chestnut Street
P.O. Box 32410
Louisville, KY 40232
Counsel for BellSouth Telecommunications, Inc.

J. Philip Carver, Senior Attorney
Suite 4300
675 West Peach Tree Street, NW
Atlanta, GA 30375
Counsel for BellSouth Telecommunications, Inc.



Counsel to South Central Telecom LLC