

Dinsmore & Shohl LLP
ATTORNEYS

Holly C. Wallace
502-540-2309
holly.wallace@dinslaw.com

October 4, 2006

RECEIVED

OCT 05 2006

PUBLIC SERVICE
COMMISSION

Via Federal Express

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: *In the Matter of: Mountain Rural Telephone Cooperative Corporation, Inc. v. Kentucky Alltel, Inc. before the Kentucky public Service Commission, Case No. 2006-00198*

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Mountain Rural Telephone Cooperative Corporation, Inc's Supplemental Data Requests to Windstream. Please file stamp one (1) copy and return it to me in the self-addressed, stamped envelope.

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

Sincerely,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk
Enclosure

110881v1

1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202
502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 05 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

MOUNTAIN RURAL TELEPHONE)
COOPERATIVE CORPORATION, INC.)
Complainant)

v.)

KENTUCKY ALLTEL, INC.)
Defendant)

Case No. 2006-00198

MOUNTAIN RURAL'S SUPPLEMENTAL DATA REQUESTS TO WINDSTREAM

Mountain Rural Telephone Cooperative Corporation, Inc., d/b/a Mountain Telephone ("Mountain Telephone"), by counsel, and pursuant to the September 1, 2006 Procedural Schedule entered by the Kentucky Public Service Commission (the "Commission") in the present case, hereby submits its supplemental data requests to Windstream East, Inc. ("Windstream").

REQUEST NO. 1: Did Windstream, or its counsel, receive a letter from Holly Wallace dated June 14, 2006 and addressed to Mark Overstreet stating that Mountain Rural may terminate Windstream for non-payment of undisputed charges?

RESPONSE:

REQUEST NO. 2: Did Windstream, by counsel, advise Mountain Rural and Commission staff during a teleconference on June 20, 2006 that it did not owe Mountain Rural payment for undisputed charges?

RESPONSE:

REQUEST NO. 3: On September 19, 2006, did Windstream pay Mountain Rural for undisputed facilities charges incurred from December 2005 through September 2006?

RESPONSE:

REQUEST NO. 4: On September 19, 2006, did Windstream pay Mountain Rural for undisputed traffic-sensitive charges incurred from July 2006 through September 2006?

RESPONSE:

REQUEST NO. 5: When did Windstream first realize it owed Mountain Rural payment for the undisputed facilities charges referenced in Request No. 3?

RESPONSE:

REQUEST NO. 6: When did Windstream first realize it owed Mountain Rural payment for the undisputed traffic-sensitive charges referenced in Request No. 4?

RESPONSE:

REQUEST NO. 7: When, if at all, did Windstream advise the Commission that it owed Mountain Rural payment for the undisputed facilities charges and the undisputed traffic-sensitive charges referenced in Request Nos. 3 and 4?

RESPONSE:

REQUEST NO. 8: Why did Windstream decide to pay the undisputed charges referenced in Request Nos. 3 and 4 on September 19, 2006, five days after Mountain Rural served its data requests, and one week before Windstream's responses were due?

RESPONSE:

REQUEST NO. 9: Prior to September 19, 2006, when did Windstream last pay Mountain Rural for undisputed facilities charges?

RESPONSE:

REQUEST NO. 10: Prior to September 19, 2006, when did Windstream last pay Mountain Rural for undisputed traffic-sensitive charges?

RESPONSE:

REQUEST NO. 11: Please identify all carrier traffic Windstream delivers on its access trunks from its Morehead tandem to the Mountain Rural West Liberty tandem.

RESPONSE:

REQUEST NO. 12: In Windstream Response No. 2 to Mountain Rural's First Set of Data Requests, Windstream stated, "Windstream disputes circuit billings prior to December, 2005 as those trunks were jointly provisioned two-way facilities provided in accordance with a Meet Point arrangement."

A. When did Windstream first dispute the circuit billings for months prior to December, 2005?

B. Provide any documents or correspondence evidencing when Windstream first disputed the billings.

C. Provide any and all documentation that supports Windstream's contention that prior to December, 2005 the trunks were provided in accordance with a Meet Point arrangement and not subject to tariffed rates.

RESPONSE:

REQUEST NO. 13: When did Windstream first dispute charges for circuits billed for December, 2005? Provide any and all documents or correspondence evidencing when Windstream disputed the circuits.

RESPONSE:

REQUEST NO. 14: When did Windstream first receive notice of what Windstream characterizes as the "removal of non-Windstream traffic from the Meet Point currently provisioned trunk rates?"

RESPONSE:

REQUEST NO. 15: Prior to November 2005, did Windstream have the ability to monitor traffic over the access trunks between Windstream's tandem and Mountain Rural?

RESPONSE:

REQUEST NO. 16: When did Windstream issue an order or otherwise request Mountain Rural to reduce the size of the access trunks between the parties? Provide documentation of that order or request.

RESPONSE:

REQUEST NO. 17: When were the access trunks resized?

RESPONSE:

REQUEST NO. 18: When did Windstream dispute interstate usage prior to September 22, 2006?

Please provide all documents or correspondence that evidences that dispute.

RESPONSE:

REQUEST NO. 19: When did Windstream dispute interLATA usage prior to September 22, 2006?

Please provide all documents or correspondence that evidences that dispute.

RESPONSE:

Respectfully submitted,



John E. Selent
Holly C. Wallace
Edward T. Depp
DINSMORE & SHOHL LLP
500 West Jefferson Street
1400 PNC Plaza
Louisville, Kentucky 40202
(502) 540-2300 (tel.)
(502) 585-2207 (fax)

**COUNSEL TO MOUNTAIN RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing was served by mailing a copy of the same by First Class United States mail, postage prepaid, to Daniel Logsdon, Esq., Alltel Kentucky, Inc., 229 Lees Valley Road, Shepherdsville, KY 40165 and Mark R. Overstreet, Esq., Stites & Harbison, 421 W. Main Street, P.O. Box 634, Frankfort, KY 40602-0634, this 4th day of October, 2006.



**COUNSEL TO MOUNTAIN RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

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