



John E. Selent
502-540-2315
john.selent@dinslaw.com

RECEIVED

July 3, 2008

JUL 03 2008

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

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:

Enclosed for filing in the above-referenced case, please find one original and ten (10) copies of the responses of South Central Telcom LLC to the BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's supplemental data requests.

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

Very Truly Yours,

John E. Selent

JES/kwi

Enclosures

cc: All Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 03 2008

In the Matter of:

PUBLIC SERVICE
COMMISSION

SOUTH CENTRAL TELCOM LLC)
Complainant)
v.)
BELLSOUTH TELECOMMUNICATIONS,)
INC.)
Defendant)

Case No. 2006-00448

**RESPONSES OF SOUTH CENTRAL TELCOM LLC TO
BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T KENTUCKY'S SUPPLEMENTAL DATA REQUESTS**

South Central Telcom LLC ("South Central Telcom"), 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 files its responses to BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's ("AT&T") Supplemental Data Requests to South Central Telcom, LLC. In response to those data requests, South Central Telcom states as follows.

SUPPLEMENTAL DATA REQUEST NO. 1: Define "toll traffic" as used by South Central Telcom in its response to AT&T's First Data Requests, Question No. 3.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: "Toll traffic," as used by South Central Telcom in response to Question No. 3 of AT&T's First Data Requests, refers to traffic that is subject to access charges under South Central Telcom's switched access tariffs at issue in this case.

SUPPLEMENTAL DATA REQUEST NO. 2: Does "toll traffic" as used by South Central Telcom in its response to AT&T's First Data Requests, Question No. 3 include traffic originated by an independent telephone company and transited by AT&T Kentucky?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this question because South Central Telcom does not endorse the factual predicate of the question. As it stated in response to AT&T's first data requests, South Central Telcom and AT&T have no agreements or arrangements for the exchange, identification, or quantification of any third-party traffic. Thus, South Central Telcom's records indicate that AT&T is the originating carrier of the traffic in question.

SUPPLEMENTAL DATA REQUEST NO. 3: Does "toll traffic" as used by South Central Telcom in its response to AT&T's First Data Requests, Question No. 3, include traffic originated by a CLEC and transited by AT&T Kentucky?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 2.

SUPPLEMENTAL DATA REQUEST NO. 4: Do "exchange access" as defined in 47 U.S.C. 3(16) and "toll traffic" as used by South Central Telcom in its response to AT&T Kentucky's First Data Requests, Question No. 3, mean the same thing to South Central Telcom? If not, explain with specificity the difference in the two terms.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects that this supplemental data request is unintelligible because there is no such statute. To the extent AT&T intended to reference 47 U.S.C. § 153(16), South Central Telcom further objects that this supplemental data request seeks the disclosure of the privileged conclusions, opinions, or legal theories of counsel to South Central Telcom.

SUPPLEMENTAL DATA REQUEST NO. 5: Admit or deny that AT&T is not certificated as an interexchange carrier in Kentucky. If denied, please fully explain the basis for your denial.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects that this supplemental data request calls solely for a legal conclusion. Without waiving this objection, South Central Telcom admits that AT&T Kentucky does not appear to be properly certificated to deliver the toll traffic at issue in this case.

SUPPLEMENTAL DATA REQUEST NO. 6: *Is traffic originated by an independent telephone company that is transported by AT&T to South Central Telcom transit traffic?* If your response is anything other than an unqualified "yes," please explain.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this question because South Central Telcom does not endorse the factual predicate of the question. South Central Telcom and AT&T have no

arrangements for the exchange, identification, or quantification of any independent telephone company or CLEC traffic. Accordingly, there is no "transit traffic." There is only toll traffic delivered to South Central Telcom by AT&T.

SUPPLEMENTAL DATA REQUEST NO. 7: Is traffic originated by a CLEC that is transported by AT&T to South Central Telcom transit traffic? If your response is anything other than an unqualified "yes," please explain.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 6.

SUPPLEMENTAL DATA REQUEST NO. 8: Does the sum South Central Telcom is seeking to recover from AT&T in this case include amounts for traffic originated by an independent telephone company and transported by AT&T to South Central Telcom? If so, please explain the difference in South Central Telcom's view between amounts originated by an independent telephone company and amounts originated by a CMRS provider?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 6.

SUPPLEMENTAL DATA REQUEST NO. 9: Does the sum South Central Telcom is seeking to recover from AT&T in this case include amounts for traffic originated by a CLEC and transported by AT&T to South Central Telcom? If so, please explain the difference in South Central Telcom's view between amounts originated by a CLEC and amounts originated by a CMRS provider?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 6.

SUPPLEMENTAL DATA REQUEST NO. 10: Admit or deny the following statement: South Central Telcom is entitled to bill AT&T out of South Central Telcom's switched access tariff for traffic originated by an independent telephone company and transited by AT&T to South Central Telcom. If admitted, please explain the difference between traffic originated by an independent telephone company and traffic originated by a CMRS-provider for which South Central Telcom is not seeking payment out of its switched access tariff.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 6. Given its response to Supplemental Data Request No. 6, South Central Telcom can neither admit nor deny.

SUPPLEMENTAL DATA REQUEST NO. 11: Admit or deny the following statement:

South Central Telcom is entitled to bill AT&T out of South Central Telcom's switched access tariff for traffic originated by a CLEC and transited by AT&T to South Central Telcom. If admitted, please explain the difference between traffic originated by a CLEC and traffic originated by a CMRS-provider for which South Central Telcom is not seeking payment out of its switched access tariff.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 6. Given its response to Supplemental Data Request No. 6, South Central Telcom can neither admit nor deny.

SUPPLEMENTAL DATA REQUEST NO. 12: Admit or deny the following statement:

South Central Telcom is not seeking to recover payment from AT&T under its switched access tariff for CMRS-originated traffic. If denied, please fully explain the basis for your denial.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Admit.

SUPPLEMENTAL DATA REQUEST NO. 13: Admit or deny the following statement:

South Central Telcom's switched access tariff is not available to local exchange carriers. If denied, please fully explain the basis for your denial.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects that that phrase "is not available to local exchange carriers" is unduly vague and ambiguous. Without waiving its objection, South Central Telcom denies the above statement and refers AT&T to its responses to AT&T's First Data Requests Nos. 3, 6, and 9.

SUPPLEMENTAL DATA REQUEST NO. 14: Identify by circuit identification number, or any other applicable specific identification method, each and every facility South Central Telcom alleges AT&T has purchased out of South Central Telcom's switched access tariff.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: None.

SUPPLEMENTAL DATA REQUEST NO. 15: Admit or deny the following statement:
The transport facilities used by AT&T to deliver the traffic at issue in this case to South Central Telcom are owned by South Central Rural Telephone Cooperative Corporation, Inc. If denied, please fully explain the basis for your denial.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this request because it requires a legal conclusion regarding the "owner" of the switched access facilities over which AT&T delivers traffic to South Central Telcom. Without waiving this objection, South Central Telcom denies the statement above and states that South Central Rural Telephone Cooperative Corporation, Inc. is the underlying network provider for South Central Telcom.

SUPPLEMENTAL DATA REQUEST NO. 16: Admit or deny the following statement:

The switch termination function for the traffic at issue in this case is performed by South Central Rural Telephone Cooperative Corporation, Inc. If denied, please fully explain the basis for your denial.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 15.

SUPPLEMENTAL DATA REQUEST NO. 17: State with specificity (a) the sum South

Central Telcom is seeking from AT&T in this case; (b) the calculation resulting in the sum set forth in (a); and (c) all documents supporting the sum set forth in (a) and the calculation set forth in (b).

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to the June 23, 2008 letter referenced in Supplemental Data Request No. 22. This amount grows daily as AT&T continues to deliver toll traffic to South Central Telcom.

SUPPLEMENTAL DATA REQUEST NO. 18: Please describe with specificity the financial arrangement between South Central Telcom and South Central Rural Telephone

Cooperative Corporation, Inc. pursuant to which South Central Telcom is terminating toll traffic for South Central Rural Telephone Cooperative Corporation, Inc.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this question because South Central Telcom does not endorse the factual predicate of the question. South Central Telcom does not terminate any toll traffic for South Central Rural Telephone Cooperative Corporation, Inc.

SUPPLEMENTAL DATA REQUEST NO. 19: Does South Central Rural Telephone Cooperative Corporation, Inc. pay the rates set forth in South Central Telcom's switched access tariff for toll traffic from South Central Rural Telephone Cooperative Corporation, Inc. terminated by South Central Telcom? If not, please set forth the rates paid by South Central Rural Telephone Cooperative Corporation, Inc.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 18.

SUPPLEMENTAL DATA REQUEST NO. 20: Please set forth every specific tariff provision in the South Central Telcom switched access tariff from which South Central Telcom contends AT&T used facilities or services for which it is obligated to pay South Central Telcom.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects that this request is unduly burdensome because it requests that South Central Telcom identify and reproduce every tariff provision in South Central Telcom's switched access tariff(s). South Central Telcom states that its tariffs are on file with the Commission, and AT&T may view those tariffs at the following Internet address: http://psc.ky.gov/tariffs/Telecommunications_N-Z/South%20Central%20Telcom,%20LLC/.

SUPPLEMENTAL DATA REQUEST NO. 21: Please set forth every specific switched access tariff provision that South Central Telcom contends reflects facilities or services used by AT&T to send toll traffic to South Central Telcom.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects that this request is premature and unduly burdensome because AT&T has not specified any portion of the South Central Telcom tariff(s) that it alleges are being misapplied, and until it does so, arguably every provision of South Central Telcom's tariff(s) reflects the facilities and services used by AT&T. Without waiving this objection, South Central Telcom states that its tariffs are on file with the Commission, and AT&T may view those tariffs at the following Internet address: http://psc.ky.gov/tariffs/Telecommunications_N-Z/South%20Central%20Telcom,%20LLC/.

SUPPLEMENTAL DATA REQUEST NO. 22: In South Central Telcom's June 23 letter supplementing its responses to AT&T's First Data Requests, South Central Telcom states that "when a carrier delivers traffic over South Central Telcom's switched access facilities, South Central

Telcom charges that carrier pursuant to its switched access tariff." Does South Central Telcom own the facilities over which AT&T delivers traffic to South Central Telcom? Please produce any documents that support your response.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please refer to South Central Telcom's response to Supplemental Data Request No. 15. At this time, South Central Telcom is not aware of any responsive documentation.

Respectfully submitted,



John E. Selety
Holly C. Wallace
Edward T. Depp
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson St.
Louisville, Kentucky 40202
Tel: (502) 540-2300
Fax: (502) 585-2207

Counsel to South Central Telcom LLC

CERTIFICATION

I hereby certify that I have supervised the preparation of South Central Telcom LLC's responses to the supplemental data requests of AT&T and that the factual responses contained therein (and for which I am designated the responsible witness) are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry. (Legal counsel is responsible for all legal objections.)

Max Phipps,
General Manager of South Central Telcom LLC

Date: _____

CERTIFICATE OF SERVICE

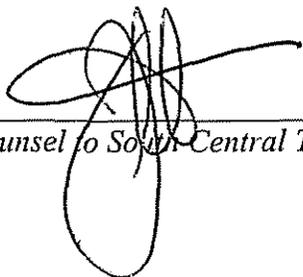
I hereby certify a true and accurate copy of the foregoing was served, by first-class United States mail, sufficient postage prepaid, on the following individuals this 5th day of July, 2008.

Mary K. Keyer
General Counsel/Kentucky
AT&T
601 W. Chestnut Street
P.O. Box 32410
Louisville, KY 40232

Counsel to AT&T

J. Philip Carver, Senior Attorney
AT&T
Suite 4300
675 West Peach Tree Street, NW
Atlanta, GA 30375

Counsel to AT&T



Counsel to South Central Telecom LLC

134588_1