

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION BY KENTUCKY ALLTEL, INC.)	CASE NO.
REGARDING SERVICE STANDARDS)	2005-00107

COMMISSION STAFF DATA REQUEST TO
KENTUCKY ALLTEL, INC.

Kentucky ALLTEL, Inc. ("ALLTEL"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 4 copies of the following information, with a copy to all parties of record. The information requested herein is due 20 days from the data of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copies material to ensure that it is legible. Where information herein has been previously provided, in the format requested, reference may be made to the specific location of said information in responding to this information request.

For Request Items 1 through 5, refer to ALLTEL's petition filed March 11, 2005.

1. Refer to pages 1 and 2, Item 5.
 - a. Provide any and all subsequent actions by the Nebraska Public Service Commission relating to ALLTEL's affiliate's service quality issues since the 2001 report.

b. Since the Verizon acquisition, identify, discuss and provide documentation of any proceedings in other states related to an ALLTEL affiliate's service quality issues.

2. Refer to page 2, Item 6.

a. Explain what ALLTEL means by "conversion-related" service issues.

b. List and describe any and all types of service issues ALLTEL has experienced or displayed since the acquisition of the Verizon territory that adversely affected ALLTEL's service objectives. Provide this information in a tabular format listing, at a minimum, the following: (1) month and year of the affected service objective report; (2) description of service issue; (3) duration of the service issue; (4) specific exchanges affected; and (5) corrective action taken, if any, to mitigate future occurrences.

3. Refer to page 2, Item 7.

a. Provide any empirical evidence to support each of ALLTEL's assertions regarding its service standard performance. This information should be in a spreadsheet format and include all the raw data, any analysis and appropriate graphs and/or charts that clearly depict ALLTEL's conclusions.

4. Refer to page 2, Item 8.

a. Is it ALLTEL's position that competitive local exchange carriers should be subject to the same service standards as incumbent local exchange carriers? If so, explain why.

b. Describe in detail why ALLTEL believes its current service standards are “arbitrarily higher and onerous.”

c. Explain in detail and provide specific examples of how the current service standards are unreasonably burdensome to ALLTEL.

d. Explain in detail and provide specific examples of how ALLTEL is “competitively disadvantage[d]” by the current service standards.

e. Explain in detail and provide any evidence regarding how changing ALLTEL’s service standard levels to those prescribed in 807 KAR 5:061 will reduce the burden on ALLTEL.

(1) In particular, discuss how measuring the same activity but applying a less stringent standard can reduce the burden on ALLTEL.

(2) Discuss how providing a report of corrective action for failing to meet a service objective for “3 consecutive months,” as Kentucky ALLTEL is required, is more burdensome than providing the same report for “two (2) consecutive months,” as required by KAR 5:061, Section 4(4).

(3) If any of ALLTEL’s discussions or explanations pertain to investment, expense or other financial related concerns, provide a full and complete analysis of those financial records that document the increased burden on ALLTEL. The analysis should include a detailed comparison of the current financial “burdens” with those projected under the Commission’s standard service objectives.

5. Refer to pages 2 and 3, Item 9. Explain in detail and provide specific examples of how competition “justif[ies] the elimination” of all service standards.

6. Refer to the Commission's February 13, 2002 Order in Case No. 2001-00399.¹ At page 4 of the Order, the Commission noted that approximately 950 employees would transfer from Verizon to ALLTEL along with many management personnel, and at page 8, it was noted that ALLTEL committed to hire and train 240 new customer service workers. Provide the following employment level information for all service affecting and/or customer service related employee position categories as of August 1 of each year since the Verizon acquisition.

(a) For each position category, supply in a tabular format the following:

(1) position description,

(2) responsibilities,

(3) total number of employees in category,

(4) total number of employees in category dedicated to Kentucky operations,

(5) geographic area/region of responsibility, and

(6) average employee years-of-service.

(b) For each position category where the number of employees has dropped since the Verizon acquisition, discuss in detail and provide any analysis that indicates whether or not service levels may have been impacted by these employee reductions.

¹ Case No. 2001-00399, Petition by ALLTEL Corporation to Acquire the Kentucky Assets of Verizon South, Incorporated.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED May 23, 2005

cc: Parties of Record