

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRANDENBURG TELEPHONE COMPANY;)	
DUO COUNTY TELEPHONE COOPERATIVE)	CASE NO.
CORPORATION, INC.; HIGHLAND)	2007-00004
TELEPHONE COOPERATIVE, INC.; MOUNTAIN)	
RURAL TELEPHONE COOPERATIVE)	
CORPORATION, INC.; NORTH CENTRAL)	
TELEPHONE COOPERATIVE CORPORATION;)	
SOUTH CENTRAL RURAL TELEPHONE)	
COOPERATIVE CORPORATION, INC.; AND)	
WEST KENTUCKY RURAL TELEPHONE)	
COOPERATIVE CORPORATION, INC.)	
)	
COMPLAINANTS)	
)	
V.)	
)	
WINDSTREAM KENTUCKY EAST, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S REQUEST TO
WINDSTREAM KENTUCKY EAST, INC.

Windstream Kentucky East, LLC (hereinafter, "Windstream"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 12, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Windstream shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which Windstream fails or refuses to furnish all or part of the requested information, Windstream shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. What rates are in Windstream's current interconnection agreements for tandem transit traffic services and end-office transit traffic service? If multiple rates are used, provide all rates.

2. Does Windstream have any contracts that use bill-and-keep arrangements for transit traffic?

3. For the following questions, refer to the cost support study submitted on December 4, 2007.

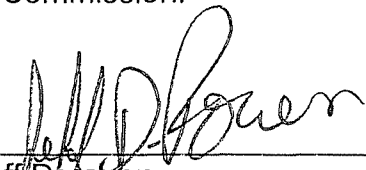
a. Was the total element long run incremental cost ("TELRIC") methodology used to prepare the study? If not, what methodology was used?

b. When was the study prepared? What time period was used to compile the data in the study?

4. This question refers to any carrier in Kentucky, including the complaining carriers in this matter. Has Windstream been paid by any carrier for traffic billed under the transit traffic tariff? If so, provide a summary of the charges and carriers that have been billed.

5. This question refers to any carrier in Kentucky, including the complaining carriers in this matter. Does Windstream have any unpaid bills issued to carriers for traffic billed under the transit traffic tariff? If so, provide a summary of the charges and companies billed.

6. Has Windstream entered into any interconnection agreements with any of the complaining carriers in this matter wherein the rates of transit traffic service and end-office transit traffic service are outlined? If so, provide a list of those agreements and the date on which each was submitted to the Commission.



Jeff DeJouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: FEBRUARY 19, 2009

cc: Parties of Record

Honorable Douglas F Brent
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

Edward T Depp
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

Honorable Dennis G Howard II
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Honorable John N Hughes
Attorney at Law
124 West Todd Street
Frankfort, KY 40601

Honorable Mark R Overstreet
Attorney at Law
Slites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KY 40602-0634

Honorable John E Selent
Attorney at Law
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

Honorable Holly C Wallace
Attorney at Law
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202