

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MCI COMMUNICATIONS SERVICES, INC.;)
BELL ATLANTIC COMMUNICATIONS, INC.;)
NYNEX LONG DISTANCE COMPANY; TTI)
NATIONAL, INC.; TELECONNECT LONG)
DISTANCE SERVICES & SYSTEMS COMPANY;)
AND VERIZON SELECT SERVICES, INC.)

COMPLAINANTS)

v.)

WINDSTREAM KENTUCKY WEST, INC.;)
WINDSTREAM KENTUCKY EAST, INC. –)
LEXINGTON; AND WINDSTREAM KENTUCKY,)
EAST, INC. – LONDON)

DEFENDANTS)

CASE NO.
2007-00503

COMMISSION STAFF'S FIRST INFORMATION
REQUEST TO MCI COMMUNICATIONS SERVICES, INC.,
BELL ATLANTIC COMMUNICATIONS, INC.,
NYNEX LONG DISTANCE COMPANY, TTI NATIONAL, INC.,
TELECONNECT LONG DISTANCE SERVICES &
SYSTEMS, AND VERIZON SELECT SERVICES, INC.

MCI Communications Services, Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, TTI National, Inc., Teleconnect Long Distance Services & Systems, and Verizon Select Services, Inc. (collectively, "Verizon"), pursuant to 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein on or before April 24, 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 the 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.

Verizon 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 request to which Verizon fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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. Discuss the impact of the Defendants' current access charges upon Verizon's long-distance Kentucky retail customers. Provide cost comparisons to Verizon's long-distance retail customers in five other Verizon Interexchange Carrier ("IXC") states.

2. Quantify the effect of Verizon's proposed reduction of access charges on the retail long-distance rates of Verizon and other carriers in the market.

a. Will a reduction of the Defendants' access charges provide a windfall for long-distance providers, including Verizon, instead of resulting in a corresponding reduction in the rates that consumers pay for long-distance?

b. Propose the methodology that should be used by the Commission to implement a reduction in the Defendants' access rates to avoid a windfall to long-distance providers while simultaneously allowing for reduced long-distance rates for consumers.

3. State whether all the complainant companies (collectively grouped as "Verizon") are vertically integrated in their wholesale and retail service offerings in Kentucky. If they are not, detail the differences by each company in Kentucky, both wholesale and retail.

4. Provide details about the rate of Verizon's retail subscriber loss in Kentucky attributed directly to the Defendants' access rates for the most recent ten calendar years.

5. With the exception of the Defendants and AT&T Kentucky, provide comparisons to the average access revenues per-minute of at least five other incumbent or competitive carriers providing switched access services to Verizon in Kentucky.

6. Does Verizon serve as an IXC in other states in which the Defendants or their affiliate or parent companies are local exchange carriers?

a. If yes, list each of those states.

b. Provide details on the intra-state switched access rates charged by the Defendants or their affiliate or parent companies to the Verizon IXC in those states.

c. State if any Verizon IXC has ever filed complaints against the Defendants or their affiliate or parent companies with the utility commissions in those states regarding their intra-state switched access rates. If so, provide copies of the final orders in those actions.

d. State if any Verizon IXC is currently engaged in any litigation (in either a state or federal venue) against the Defendants or their affiliate or parent companies stemming from any order by any commission regarding their intra-state access charges.

7. Provide a list of the Defendants' specific Kentucky intra-state access charge elements, along with a tariff reference, that Verizon alleges are unreasonable.

a. For each of those elements, provide the Verizon position on a reasonable rate that should replace that particular rate.

b. For each of those elements, provide a list of comparable interstate access charge elements currently tariffed by the Defendants.

8. Provide any cost studies, research projects, professional papers, or other internal documentation supporting Verizon's allegations that the Defendants' Kentucky access charges are unreasonable.


9. Quantify the effect of Verizon's proposed reduction of access charges on the retail long distance rates of Verizon and other carriers in the Kentucky market.

10. What particular rates does Verizon propose that the Defendants increase to offset the reduction in revenue from reducing its access charges?

11. On what basis should the Commission determine the qualifications for the fair, just, and reasonable access rates to be charged by the Defendants?

12. On November 5, 2008, the Federal Communications Commission ("FCC") released a Further Notice of Proposed Rulemaking in *In re: Developing a Unified Inter-carrier Compensation*, CC Docket No. 01-92, *et al.*, that, among other things, proposed a reform of inter-carrier compensation including access charges on the intrastate level.

- a. Did Verizon provide any comments to the FCC in response to the petition?
- b. If so, provide copies of those comments.
- c. Is anything proposed by the FCC contradictory to Verizon's proposal before this Commission?



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Public Service Commission
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cc: Parties of Record

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