

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.)	CASE NO.
)	2007-00503
)	
WINDSTREAM KENTUCKY WEST, INC.;)	
WINDSTREAM KENTUCKY EAST, INC. –)	
LEXINGTON; AND WINDSTREAM KENTUCKY)	
EAST, INC. – LONDON)	
)	
)	
DEFENDANTS)	

COMMISSION STAFF'S FIRST INFORMATION
REQUEST TO WINDSTREAM KENTUCKY WEST, INC.,
WINDSTREAM KENTUCKY EAST, INC. – LEXINGTON,
AND WINDSTREAM KENTUCKY EAST, INC. – LONDON

Windstream Kentucky West, Inc., Windstream Kentucky East, Inc. – Lexington, and Windstream Kentucky East, Inc. – London (individually, “Windstream Kentucky West” or “Windstream Kentucky East,” or, collectively, “Windstream”), 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.

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 request to which Windstream 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. Refer to Verizon's Petition at page 7. State whether any of the Windstream companies currently pay non-traffic-sensitive access charges to local carriers that have billed them for intra-LATA toll traffic generated by the Windstream

Interexchange Carrier services. If such charges are not being paid, provide a detailed explanation as to why they are not paid.

2. Describe the likely revenue or competitive harm the Windstream companies would experience if compelled by the Commission to reduce their switched access rates.

3. Answer this question separately for Windstream Kentucky East and Windstream Kentucky West:

a. How much did the company collect in non-traffic-sensitive revenue for 2008?

b. How much revenue did the company collect in intra-state switched access for 2008?

c. How much revenue did the company collect in intra-state special access for 2008?



Jeff Derouen
Executive Director
Public Service Commission
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DATED: **MAR 30 2009**

cc: Parties of Record

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