

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Application of Competitive Carriers of the )  
South, Inc. for a Declaratory Order Affirming that )  
The Interconnection Regimes under KRS 278.530 ) Case No. 2015-00283  
and 47 U.S.C. § 251 are Technology Neutral )

**VERIZON'S FIRST SET OF INFORMATION REQUESTS TO COMPSOUTH**

MCImetro Access Transmission Services LLC. d/b/a Verizon Access Transmission Services (Verizon), by counsel, requests that Competitive Carriers of the South (CompSouth) respond to the following information requests.

**INSTRUCTIONS**

1. With respect to each information request, please provide a response for each CompSouth member participating in this docket.
2. With respect to each information request, please state the name(s) and title(s) of the person or persons responsible for preparing the response for each CompSouth member.
3. If a CompSouth member refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
4. If a CompSouth member believes that any request is ambiguous, please notify Verizon so that the request may be clarified prior to the preparation of a written response.
5. These requests shall be deemed continuing so as to require further and supplemental responses if a CompSouth member receives or generates additional information within the scope of these requests between the time of the original responses and the end of any hearings in this proceeding.

## **DEFINITIONS**

In these information requests, the following terms have the following meanings:

“Concerning” means referring to, describing, evidencing or constituting.

“Document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, audio or video recordings, emails and other data compilations from which information can be obtained. A draft or non-identical copy of a document is a separate document.

“Identify,” with respect to a person, means to provide the person’s full name, present or last known address, and, when referring to a natural person, the present or last known place of employment and employment title.

“CompSouth member” and “you” mean each CompSouth member participating in this docket, including all of their subsidiaries and parents, and all entities owned or controlled by any such subsidiaries or parents.

## **INFORMATION REQUESTS**

VZ 1-1        Please identify, by title, effective date and the names of all parties, each agreement that each CompSouth member has entered into with a service provider other than an affiliate of yours concerning, providing for or governing the exchange in IP format of voice traffic going from you to the other party as well as voice traffic coming from the other party to you.

VZ 1-2        Please produce all agreements identified in response to VZ 1-1, including all attachments, exhibits and schedules.

VZ 1-3           What percentage of each CompSouth member's retail customers subscribe to VoIP service from you? Please answer separately for each of your affiliates that have retail customers.

Respectfully submitted,

McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC  
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BY:   /s/ Luke Morgan    
W. BRENT RICE  
LUKE MORGAN  
ATTORNEYS FOR VERIZON

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the same document being sent for filing in paper medium with the Commission, that the electronic filing was transmitted to the Commission on August 18, 2016 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

  /s/ Luke Morgan    
ATTORNEY FOR INTERVENORS