# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

N AUG 2 7 2007 PUBLIC SERVICE COMMISSION

A CERTIFICATION OF THE CARRIERS RECEIVING UNIVERSAL SERVICE HIGH COST SUPPORT ADMINISTRATIVE CASE NO. 381

On September 25, 2001, the Public Service Commission of Kentucky (the "Commission") issued an order in Administrative Case No. 381 requiring all carriers to file with the Commission their plans for the use of any high-cost federal support by September 1 of each calendar year.

Accordingly, Windstream Kentucky West, Inc., ("Windstream West") submits the following and respectfully requests that the Commission file, with the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC"), a certification that Windstream West's proposed capital expenditures for 2008 comply with the FCC's criteria and, accordingly, is eligible to receive federal Universal Service Fund support.

#### **Estimate of USF Support Amount**

Windstream West estimates its Federal Universal Service support for 2008 will be approximately because.

#### **Intended Use of Support**

All Federal USF support received, for Windstream West properties in the Commonwealth of Kentucky, will only be used for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with section 254(e) of the Telecommunications Act of 1996 (the Act).

#### Achieving Comparability of Rates and Services

In Section 254 of the Act, Congress articulated a national goal that consumers in all regions of the nation, including rural, insular and high cost areas, should have access to telecommunications and information services at rates that are reasonably comparable to rates charged for similar services in urban areas<sup>1</sup>.

The actual cost to provide service in rural high cost areas is determined by many factors including the cost of the local loop and the costs associated with operating, maintaining, and upgrading facilities. Local loop costs and the costs of operating, maintaining, and upgrading facilities vary widely due to many factors, including subscriber density, terrain, local exchange size, accessibility, and labor costs<sup>2</sup>. To this end, the Federal Universal Service support received by Windstream West will offset some of the financial burden of owning, operating, maintaining, and upgrading facilities in rural areas and allows these services to be offered at rates that are comparable to rates for similar services in non-rural areas.

### Listing of Specific Projects

Attachment "A" contains a listing of Windstream West's specific Capital Budget projects and the estimated cost of each project currently budgeted for completion in 2008. Windstream West anticipates that these projects will be completed and associated dollars expended in 2008, but this is subject to change as conditions warrant. Additionally, Windstream West will use the Federal High Cost support funds and other funds generated from various sources to support not only the projects listed in Attachment "A", but also to maintain embedded plant and for various other purposes allowed by the Federal Communications Commission rules.

I See FCC's FOURTEENTH REPORT AND ORDER, TWENTY-SECOND ORDER ON RECONSIDERATION, AND FURTHER NOTICE OF PROPOSED RULEMAKING IN CC DOCKET NO 96-45, AND REPORT AND ORDER IN CC DOCKET NO 00-256, released May 23, 2001, paragraph 2

<sup>2 2</sup> See Footnote #525, Page 116 of the FCC's Report and Order CC Docket No. 96-45

As can be seen, the capital projects scheduled for 2008 contained in Attachment "A" far

exceed Windstream West's estimated Federal Universal Service support.

## Contacts

All questions pertaining to the information contained in this filing should be directed to:

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Submitted this 27 day of August, 2007.

Respectfully submitted,

WINDSTREAM KENTUCKY WEST, INC.

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COUNSEL FOR WINDSTREAM KENTUCKY WEST, INC.

# ATTACHMENT A

# Windstream Kentucky West, Inc.

**2008 Capital Budget Projects** 

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Job Description	FB SHPV CO to KY61	PW ZNTN ADD BDFB	EN Echo Remote HVAC	AG ADSL GROWTH FUND	RM Major Road Move Blanket	SD Major Subdivision Blanket	SD Major Subdiv DLC Blanket	BA DLC Battery Replacement	AG ADSL Growth Fund CAT4	
Exchange Name	722181001 SHEPHERDSVILLE		2008 Shepherdsville		722180075 PLANT REPLACEMENTS	722180076 PLANT GROWTH		722180078 DLC BATTERIES		
Job Number	722181001			722180992 ADSL	722180075		722180077 DLC		722180994 ADSL	
8	221	221	221	221	221	221	221	221	221	
Job Tvne	dSD	COE	L&B	ELC	OSP	OSP	ELO	ELO	ELO	

CATEGORIES

- COE Central Office Switching hardware and software ELC Central Office Transport Equipment Bandwidth OSP Outside Plant projects for local loop and interoffice fiber ELO Outside Plant Electronics remote switch (Digital Loop Carrier) L&B Land and Buildings.
- \* Excludes routine fund projects