

S T O L L | K E E N O N | & | P A R K | L L P

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August 25, 2004

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AUG 26 2004
PUBLIC SERVICE
COMMISSION

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

RE: Administrative Case No. 382

Dear Ms. O'Donnell:

Enclosed please find an original and six copies of Nuvox's Motion for Permission to File Second Set of Data Requests to Kentucky AllTel and NuVox's Proposed Second Set of Data Requests. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely yours,



Douglas F. Brent

DFB:jms

Enc.

Cc: All parties of record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
AUG 26 2004
PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INQUIRY INTO THE DEVELOPMENT)
OF DEAVERAGED RATES FOR) ADM. CASE NO. 382
UNBUNDLED NETWORK ELEMENTS)

**MOTION FOR PERMISSION TO FILE SECOND SET OF
DATA REQUESTS TO KENTUCKY ALLTEL**

NuVox Communications, Inc. (“NuVox”), by counsel, hereby requests that the Commission enter an Order permitting NuVox to serve additional data requests to Kentucky ALLTEL, Inc. (“ALLTEL”). In support of this motion¹, NuVox states as follows:

The initial procedural schedule for this phase of the UNE rate proceeding provided for a single round of discovery. NuVox previously issued a set of thirteen data requests to ALLTEL. ALLTEL responded to these requests on June 11, 2004. Subsequently, both NuVox and ALLTEL requested a hearing. The Commission issued a procedural schedule providing for prefiled direct and rebuttal testimony prior to the hearing, currently scheduled for November 30, 2004.

NuVox has reviewed the ALLTEL UNE Price List, supporting documentation, and responses to data requests. This review is in anticipation of filing direct testimony on October 1, 2004. However, meaningful review of the TELRIC study and backup data previously filed by ALLTEL has been greatly limited by the fact that the supporting

¹ The Commission has granted requests for additional discovery upon a showing of good cause. *E.g.*, *Petition of CTA Acoustics, Inc.* Case No. 2003-00026, Order (January 8, 2004) (allowing additional discovery on rebuttal testimony “may result in a more efficient evidentiary hearing”).

documents and worksheets (i.e. material in Tabs "AG" through "BO") were filed only in paper format. Counsel for NuVox has inquired about whether this information (which totals several thousand pages) is available in an electronic format that can be reviewed and tested by NuVox. ALLTEL advised that the study backup comes from various databases and sub-systems that use several different types of software, and some of the information is produced only as a printout for manual study input.

NuVox infers from ALLTEL's response that some of the study backup would be unusable by NuVox even if provided electronically, absent the ability of NuVox to review it using proprietary software. Accordingly, NuVox has prepared additional data requests, filed contemporaneously with this motion, intended to create a more complete record prior to the filing of testimony.


The record in this proceeding is currently inadequate to enable NuVox to test and comment on ALLTEL's claim that its proposed UNE rates which apply to the network elements needed by NuVox are TELRIC-compliant. Responses to a reasonably tailored set of data requests will help create an adequate evidentiary record, and may reduce the amount of time necessary at hearing to attempt to elicit such information.

Prompt action on this motion may enable the parties to proceed with filing of testimony under the current procedural schedule. However, NuVox requests that it have a minimum of ten business days after the filing of ALLTEL's responses to prepare direct testimony.

Wherefore, NuVox respectfully requests that the Commission enter an order requiring ALLTEL to respond to data requests 14 through 37 filed herewith.

Carol Keith
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Respectfully submitted,



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE DEVELOPMENT)
OF DEAVERAGED RATES FOR) ADM. CASE NO. 382
UNBUNDLED NETWORK ELEMENTS)

**NUVOX'S SECOND SET OF
DATA REQUESTS TO KENTUCKY ALLTEL**

For its second set of data requests to Kentucky ALLTEL, Inc. ("ALLTEL"),
NuVox Communications, Inc. ("NuVox"), by counsel, submits as follows:

14. Regarding Exhibit A (UNE Price list) to ALLTEL's TELRIC study, file *KAUNew1.xls*, sheet "*Rate Sheet*." please explain the rationale for proposing monthly recurring (rather than non-recurring) conditioning charges.
15. With reference to ALLTEL's June 11, 2004 response to Nuvox Data Request Number 3 (application of UNE rates to EELs): Please specify the number of Transport Termination charges that would apply to an EEL.
16. Regarding ALLTEL's TELRIC study, file *KAUNew1.xls*, sheet "*Accounts*:" For each of the account numbers in column B, please provide a narrative description of this account. Please provide this information electronically in a Microsoft Excel or Word format.
17. Regarding ALLTEL's TELRIC study, file *KAUNew1.xls*, sheet "*Input Description*." Please provide in electronic format that allows for data manipulation (not .PDF) input source files listed in column F, specifically: (a) Exchange.mdb; (b) Labor File; (c) Rate_tbl.xls.
18. Regarding ALLTEL's TELRIC study, file *KAUNew1.xls*, in the worksheet "Cost Factors", please provide a complete description along with all underlying calculations and source material used to develop the values of all factors, rates, and percentages listed in Column (e), labeled "Current Factors".

If any of this information has previously been provided in the TELRIC study backup documents, please indicate where the information can be found.

19. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Material Factors", please provide a complete description along with all underlying calculations and source material used to develop the values of the data in column (b) "Material Costs", for each of the following:

Loop Aerial Cable	(Cell B8)
Loop U/G Cable	(Cell B9)
Loop Buried Cable	(Cell B10)
Loop Aerial Drop	(Cell B11)
Loop Buried Drop	(Cell B12)
Loop Copper Equipment	(Cell B13)
Loop Fiber Cable	(Cell B14)
Loop Fiber Equipment	(Cell B15)
PRI-ISDN / DS-1 2 wire	(Cell B70)
PRI-ISDN / DS-1 4 wire	(Cell B71)
DS0 Local Loops Equipment Factor	(Cell B77)
DS1 Local Loops Equipment Factor	(Cell B78)

If any of this information has previously been provided in the TELRIC study backup documents, please indicate where the information can be found.

20. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Import Data", for the data in columns D-I (Loop Aerial Cable, Loop U/G Cable, Loop Buried Cable, Loop Aerial Drop, Loop Buried Drop, Loop Fiber Cable), the values can be traced to the Woms Summary report in the TELRIC study backup documents, tab AN.
- a) Please provide in electronic format the data that is the source of the Woms summary report.
 - b) Please provide all underlying calculations and source material used to develop the values of the data listed in the Woms summary report.
21. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Import Data", for the data in column J (Loop Fiber Equipment), the source of this information is listed in the Input description worksheet as a Woms Electronic Data Report.

- a) Please provide in electronic format the data that is the source of the Woms Electronic Data Report.
 - b) Please provide all underlying calculations and source material used to develop the values of the data listed in the Woms Electronic Data Report.
22. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Material Factors" please provide a complete description along with all underlying calculations and source material used to develop the values listed in Column (c), "Quantity".
23. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Conditioning Cost", for the data in column M (PRI-ISDN / DS-1 4 Wire):
- a) Please provide a complete description along with all underlying calculations and source material used to develop the estimates for hours associated with each activity and the cost per hour for these activities.
 - b) Were the estimated hours developed through time and motion studies? If yes, please provide the related time and motion study.
 - c) Were the estimated hours developed by Subject Matter experts (SMEs)? If yes, please provide all questionnaires, responses and related documentation involved in these estimates along with a detailed record of the job positions and responsibilities of the personnel who provided these estimates.
24. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Import Data" please explain why the "Digital Line Concentrator " (DLC) equipment in column K is categorized as loop copper equipment, when the information in the TELRIC study backup documents in tab BB indicates the DLC equipment is fiber fed?
25. Regarding ALLTEL's TELRIC study, file KAUNew1.xls, in the worksheet "Input Description", the source for the Digital Line Concentrator equipment on line 13 is listed as the Digital Line Concentrator Model. There are two reports associated with this model, "Nebraska ALLTEL - 150 DLC" and "Calix Budgetary Pricing Tool (DLC)". The "Calix Budgetary Pricing Tool (DLC)" can be found in the TELRIC study backup documentation in tab BB. Please provide the "Nebraska ALLTEL - 150 DLC" report data and any other information not previously provided that was relied on to develop the costs in the DLC model.

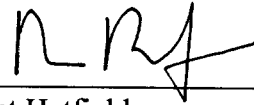
26. Regarding the “Calix Budgetary Pricing Tool (DLC)” information in tab BB of ALLTEL’s TELRIC study backup documentation, for what time period are (were) the contract prices for DLC equipment in backup tab BB valid?
27. Regarding the “Calix Budgetary Pricing Tool (DLC)” information in tab BB of ALLTEL’s TELRIC study backup documentation:
- a) When ALLTEL currently places DLC equipment in its network, is this the same type of equipment listed in tab BB? Please provide an explanation of exceptions.
 - b) Please provide a copy of the contract between ALLTEL and its equipment vendor for the DLC equipment that ALLTEL intends to place in service on a going forward basis. This contract must include all pricing schedules by year and any terms that cause adjustments to prices within the contract.
28. Regarding the “Calix Budgetary Pricing Tool (DLC)” information in tab BB of ALLTEL’s TELRIC study backup documentation:
- a) Please confirm or deny that the prices for DLC equipment in backup tab BB include investment associated with ADSL equipment.
 - b) If confirmed, please indicate whether this ADSL equipment investment is necessary to support DS1 loops provided via the DLC equipment?
29. Regarding the “Calix Budgetary Pricing Tool (DLC)” information in tab BB of ALLTEL’s TELRIC study backup documentation:
- a) Please confirm or deny that this equipment is configured to support DS1 loops.
 - b) If this equipment is configured to support DS1 loops, please provide a full explanation of other equipment components currently in the DLC model that are not necessary to support DS1 loops.
 - c) If the equipment in tab BB is not currently configured to provide DS1 loops, please provide revised DLC equipment information along with a detailed description for this DLC equipment that is configured to support DS1 loops.
30. Regarding the “Calix Budgetary Pricing Tool (DLC)” information in tab BB of ALLTEL’s TELRIC study backup documentation:
- a) What percentage of each DLC component is used exclusively to support DS0 loops?

- b) What percentage of each DLC component is used exclusively to support ADSL loops?
 - c) What percentage of each DLC component is used exclusively to support DS1 loops?
 - d) Which components can be shared by different services and if so what percentage is associated with each service (e.g., DS0, DS1, ADSL)?
31. In ALLTEL's existing Kentucky network, what percentage of the existing DS1 loops are served via fiber based DLC technology versus a copper based DS1 technology?
32. For the DS1 loops that ALLTEL expects will be placed in service within the near future (2-3 years), what percentage of the DS1 loops does ALLTEL expect will be served via fiber based DLC technology versus a copper based DS1 technology?
33. Regarding ALLTEL's TELRIC study, file KAUNEw1.xls and associated backup documents:
- a) What percentage occurrence is assumed for DS1s served via fiber based DLC technology versus a copper based DS1 technology?
 - b) Please provide all supporting documentation, analysis or validation for the percentage assumptions used in the study for copper and fiber based DS1 loops.
34. Regarding the percentage occurrence of DS1s served via fiber based DLC technology versus a copper based DS1 technology:
- a) For DS1 loops that may be placed into service in the near future (2-3 years), would the percentage of fiber and copper based DS1s vary by type of service provided (DS0, DS1)?
 - b) For DS1's placed into service in the near future (2-3 years), would the percentages of fiber and copper based DS1s vary by wire center (caused by differences in density and size of the geographic area of the wire center)?
 - c) Please provide the counts by wire center of existing DS1s served via fiber based DLC technology versus a copper based DS1 technology.
35. Regarding the percentage occurrence of DS1s served via fiber based DLC technology versus a copper based DS1 technology: How are copper facilities adjusted or allocated to compensate for the fact that the forward looking mix of fiber & copper DS1s is different than the existing mix? In other words,

since the study is based on the existing network and percentage of copper facilities, this information needs to be adjusted to compensate for the forward-looking occurrence of copper DS1s. How are the costs of this total copper network adjusted downward to compensate for the fact that many future DS1 loops will use fiber based DLC technology?

36. Regarding the costs for DS1 loops in ALLTEL's cost study, for DS1 loops served via fiber based DLC technology and for DS1 loops served via copper DS1 technology, please provide schematics or equipment diagrams which indicate all necessary components involved with each technology, and indicate where in the cost study or backup documentation the costs for these components are found.
37. Regarding existing DS1 loops in ALLTEL's network, for DS1 loops served via fiber based DLC technology and for DS1 loops served via copper DS1 technology, please provide schematics or equipment diagrams which indicate all necessary components involved with each technology.

Respectfully submitted,



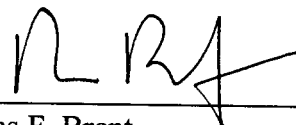
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Certificate of Service

A copy of the foregoing was served this 25th day of August, 2004, by first class, United States mail, postage prepaid, upon all parties of record. On this same date, a copy was delivered by email to Kimberly Bennett and James Newberry, counsel to Kentucky ALLTEL.



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