

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

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November 9, 2004

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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 ten copies of Nuvox's Third Set of Data Requests to Kentucky ALLTEL. NuVox requests that ALLTEL respond to these requests by November 19. 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,



C. Kent Hatfield

Enc.

Cc: All parties of record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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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 THIRD SET OF
DATA REQUESTS TO KENTUCKY ALLTEL**

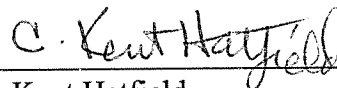
For its third set of data requests to Kentucky ALLTEL, Inc. ("ALLTEL"), NuVox Communications, Inc. ("NuVox"), by counsel, submits as follows:

38. With reference to ALLTEL's response to NuVox data request 19, which states "there are no underlying calculations behind any of these numbers," please provide the calculations and a narrative description of the equipment and processes that were used to generate the values that ALLTEL describes as "direct inputs" in cells B70 through B78.
39. With reference to ALLTEL's response to NuVox data request 35 (b) which generally described the process of converting existing network facility data into the information that became the "Budline Report", which was provided in response to NuVox data request 20(b), the underlying calculations and source material used to develop these values have not been provided as requested in NuVox data request 20(b). The process described in response to NuVox data request 35 (b) appears to be a summary of the process described in slightly more detail in sections D.2 – D.5 of the supporting documentation file "ALLTEL Telric Procedures.doc. Please provide the spreadsheets and any other process information or program or data used in the conversion of ALLTEL's existing network facility data into the information finally used in ALLTEL's study, which are described in D.2 – D.5 of the "ALLTEL Telric Procedures.doc" documentation.
40. With reference to ALLTEL's response to NuVox's request for follow-up to data request 21 which stated "The values shown on Tab AJ, "Electronic Data", and in the file provided September 20, 2004 are the correct amounts for Loop Fiber Facilities", please provide a full explanation for the difference in

the values in the data provided in response to data request 21 and the values in column J, "Loop Fiber Equipment" of the worksheet "Import Data" in ALLTEL's cost study.

41. With reference to ALLTEL's response to NuVox's data request 21(b) which requested "all underlying calculations and source material used to develop the values of the data listed in the Woms Electronic Data Report", the information provided by ALLTEL is not a sufficiently complete response. The calculations provided by ALLTEL are based on values for "Loop Electronic Prices" that are inputs in the "Electronic Prices" tab of "KY ALLTEL_Fiber Equipment Data.xls". Please provide all underlying calculations and source material used to derive these "input" values, such as details on the components and prices used, and any loadings that have been applied.
42. With reference to ALLTEL's response to NuVox data request 23(a) please provide the labor study referenced in the response.. Please provide all documents generated as a result of "discussions with ALLTEL engineering subject matter experts" and all underlying workpapers. Please identify the subject matter experts.

Respectfully submitted,



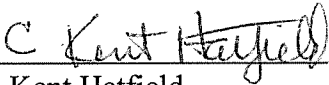
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Certificate of Service

A copy of the foregoing was served this 5th day of November, 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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