



7037 Old Madison Pike, Suite 400
Huntsville, AL 35806

July 6, 2005

Via Overnight Delivery

Ms. Beth A. O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RECEIVED

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PUBLIC SERVICE
COMMISSION

Re: Administrative Case No. 2005-00186
Business Telecom, Inc.'s Response to Information Requested

Dear Ms. O'Donnell

Enclosed for filing with the Commission is the original and five (5) copies of Business Telecom, Inc., d/b/a BTI's responses to the Appendix and the Attorney General's data requests in Administrative Case No. 2005-00186.

Please acknowledge receipt of this filing by date-stamping the enclosed cover letter labeled "return receipt" and mailing to me in the self-addressed, stamped envelope I have provided for this purpose.

Should you have any questions regarding this filing, please contact me at 256-382-3967.

Sincerely,

Sue Gibson
Regulatory Manager

Enclosures

cc: Attorney General

Appendix

1. Does the utility offer a plan that is described, named, or marketed as “unlimited”? If yes, identify and describe the plan and provide copies of the tariff sheets on which the plans can be found.

Response: No.

2. If the utility has an “unlimited” plan, are there use restrictions or other limitations on the plan? If yes, describe these restrictions and reference the utility’s tariff.

Response: See response to Number 1 above.

3. How and when are customers or potential customers notified of the limitations on the unlimited plan? Describe the notification.

Response: See response to Number 1 above.

4. If third parties (agents, telemarketers, consignees, etc.) market, advertise, or otherwise offer end-users the utility’s unlimited plan, explain how those “marketers” are required to verify compliance with the notice requirements.

Response: See response to Number 1 above.

5. Assuming a customer has subscribed to an “unlimited” plan that has use limitations, is the customer notified when the limitations are exceeded? If yes, how is the customer notified?

Response: See response to Number 1 above.

6. How and when are customers notified that changes have been made to the plan?

Response: See response to Number 1 above.

7. Are customers able to check the number of minutes they have used in order to determine if they will exceed the plan’s limitations?

Response: See response to Number 1 above.

8. Explain why the utility markets, names or describes a plan as “unlimited” when limits on the plan exist.

Response: See response to Number 1 above.

9. Explain how the utility ensures that the unlimited plan is offered and the rates, terms, and conditions of service are applied without discrimination as required by KRS 278.170(1).

Response: See response to Number 1 above.

10. Provide summary records of all complaints received by the utility regarding any unlimited plans offered in Kentucky since January 1, 2005. Include the date that the complaint was opened, customer class, description of complaint resolution, and date that the complaint was closed.

Response: None. See response to Number 1 above.

Attorney General's Data Requests

1. Please provide copies of all advertisements, regardless of medium, solicitations, and explanations provided to the public to introduce, explain and/or market any plan labeled or otherwise described as "unlimited." In the event that the medium used is audio or video in nature, a transcript of same *is* deemed sufficient.

Response: BTI has no "unlimited" products.

2. Please provide a copy of any and all contracts by customers who have participated or are participating in a plan labeled or otherwise described as "unlimited." This request seeks only a copy of the blank contract(s), not the executed contract for every customer.

Response: For the state of Kentucky, the answer is zero (0).