

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  
JUL 07 2005  
PUBLIC SERVICE  
COMMISSION

Re: Administrative Case No. 2005-00186  
ITC^DeltaCom Response to Information Requested

Dear Ms. O'Donnell

Enclosed for filing with the Commission is the original and five (5) copies of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom, d/b/a Grapevine of Kentucky'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:** ITC^DeltaCom offers “**State of Grape Local Service**”, “**GrapeNation Local Service**”, and “**GrapeState Local Service**” through Grapevine of Kentucky, ITC^DeltaCom’s consumer services division. State of Grape, GrapeNation, and GrapeState products provide the customer with “unlimited local exchange voice service”. The tariff pages for these products are attached herein as Attachment A.

Please be advised ITC^DeltaCom has no customers on these products in Kentucky. Grapevine Services and all associated products are being “grandfathered” effective July 11, 2005 and are no longer available to new customers.

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:** ITC^DeltaCom does not market, advertise, or offer these products through marketers in the state of Kentucky. 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:** ITC^DeltaCom did not market its Grapevine product in Kentucky.

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).

## **ATTACHMENT A**

Issued: June 11, 2005  
Issued By: Senior Manager – Regulatory Attorney

Effective: July 11, 2005

(T)

---

LOCAL EXCHANGE SERVICE

SECTION 5 – GRAPEVINE of Kentucky SERVICES AND RATES *continued*

**5.6 State of Grape Local Service**

Customers who subscribe to this service must select Grapevine as both their Local Exchange Carrier and Interexchange Carrier (for interstate, intrastate and intraLATA toll calls). This service is not available for subscription as a stand-alone service; concurrent with enrollment in this plan, customers must also subscribe to Grapevine’s companion residential Long Distance Service. State of Grape Local Service is designed for use by residential customers with basic residential lines only and is limited to three (3) lines at a single service address.

A monthly recurring charge as set forth below will apply for subscription to both State of Grape Local and Long Distance Service. Unlimited local exchange voice service and touch tone calling are included in the monthly recurring fee.

Primary Line	\$49.99	(I)
First Additional Line	\$39.99	(I)
Second Additional Line	\$39.99	(I)

The following features, where facilities are available, are also provided at no additional charge:

Call Waiting	International Call Blocking
Call Waiting ID	Collect Call Blocking
Caller ID	Third Party Blocking
3-Way Calling	Third Party Collect Call Blocking
Anonymous Call Rejection	Toll Call Blocking
Blocking for Caller ID	900/976 Blocking
Call Return	

The following are not included in the monthly recurring charge: non-recurring charges, operator services, operator assistance, directory assistance, directory listing options, interstate line charge, taxes, surcharges, data usage charges, per use charges and custom calling features and/or blocking options not included above.

**[As of June 4, 2004 State of Grape Local Service was reserved for currently subscribed customers and is no longer available to new customers.]**

---

Issued: June 11, 2005  
 Issued By: Senior Manager - Regulatory Attorney

Effective: July 11, 2005

(T)

LOCAL EXCHANGE SERVICE

SECTION 5 – GRAPEVINE of Kentucky SERVICES AND RATES *continued*

**5.7 GrapeNation Local Service**

Customers who subscribe to this service must select Grapevine as both their Local Exchange Carrier and Interexchange Carrier (for interstate, intrastate and intraLATA toll calls). This service is not available for subscription as a stand-alone service; concurrent with enrollment in this plan, customers must also subscribe to Grapevine’s companion residential Long Distance Service. GrapeNation Local Service is designed for use by residential customers with basic residential lines only and is limited to three (3) lines at a single service address.

A monthly recurring charge as set forth below will apply for subscription to both GrapeNation Local and Long Distance Service. Unlimited local exchange voice service and touch tone calling are included in the monthly recurring fee.

Primary Line		
Option A, GrapeNation (with VoiceMail)*	\$64.99	(I)
Option B, GrapeNation Lite (without VoiceMail)	\$59.99	(I)
First Additional Line	\$39.99	(I)
Second Additional Line	\$39.99	(I)

The following features, where facilities are available, are also provided at no additional charge:

Call Waiting	International Call Blocking
Call Waiting ID	Collect Call Blocking
Caller ID	Third Party Blocking
3-Way Calling	Third Party Collect Call Blocking
Anonymous Call Rejection	Toll Call Blocking
Blocking for Caller ID	900/976 Blocking
Call Return	

\* Voice Mail is included on Customer's Primary Line. Customers subscribing to Voice Mail on Additional Lines will incur a monthly recurring charge of \$5.95 per line for each additional line.

**[AS OF JULY 11, 2005 GRAPEVINE SERVICES AND ALL ASSOCIATED PRODUCTS ARE RESERVED FOR CURRENTLY SUBSCRIBED CUSTOMERS AND ARE NO LONGER AVAILABLE TO NEW CUSTOMERS.]**

(N)  
 (N)  
 (N)

Issued: June 11, 2005  
 Issued By: Senior Manager – Regulatory Attorney

Effective: July 11, 2005

(T)

LOCAL EXCHANGE SERVICE

SECTION 5 – GRAPEVINE of Kentucky SERVICES AND RATES *continued*

**5.11 GrapeState Local Service**

Customers who subscribe to this service must select ITC^DeltaCom Communications, Inc. as both their Local Exchange Carrier and Interexchange Carrier (for interstate, intrastate and intraLATA toll calls). This service is not available for subscription as a stand-alone service; concurrent with enrollment in this plan, customers must also subscribe to the companion residential Long Distance Service. GrapeState Local Service is designed for use by residential customers with basic residential lines only and is limited to three (3) lines at a single service address.

A monthly recurring charge as set forth below will apply for subscription to both GrapeState Local and Long Distance Service. Unlimited local exchange voice service and touch tone calling are included in the monthly recurring fee.

Primary Line	\$49.99
First Additional Line	\$39.99
Second Additional Line	\$39.99

(I)  
(I)  
(I)

The following features, where facilities are available, are also provided at no additional charge:

Call Waiting	International Call Blocking
Call Waiting ID	Collect Call Blocking
Caller ID	Third Party Blocking
3-Way Calling	Third Party Collect Call Blocking
Anonymous Call Rejection	Toll Call Blocking
Blocking for Caller ID	900/976 Blocking
Call Return	

The following are not included in the monthly recurring charge: non-recurring charges, operator services, operator assistance, directory assistance, directory listing options, interstate line charge, taxes, surcharges, data usage charges, per use charges and custom calling features and/or blocking options not included above.

**[AS OF JULY 11, 2005 GRAPEVINE SERVICES AND ALL ASSOCIATED PRODUCTS ARE RESERVED FOR CURRENTLY SUBSCRIBED CUSTOMERS AND ARE NO LONGER AVAILABLE TO NEW CUSTOMERS.]**

(N)  
(N)  
(N)