



S T O L L · K E E N O N · O G D E N
P L L C

2000 PNC Plaza
500 West Jefferson
Louisville, KY 40202
(502) 333-6000
Fax: (502) 333-6099
www.skofirm.com

DOUGLAS F. BRENT
(502) 568-5734
douglas.brent@skofirm.com

July 27, 2006

Elizabeth O'Donnell
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

RECEIVED
JUL 31 2006
PUBLIC SERVICE
COMMISSION

RE: Case No. 2005-00186 – Momentum Telecom's Response to Attorney General's Supplemental Information Requests

Dear Ms. O'Donnell:

Enclosed please find responses of Momentum Telecom, Inc. ("Momentum") to the Supplemental data requests of the Attorney General.

Five copies of Momentum's response are enclosed. In addition, we are serving one copy to Assistant Attorney General Dennis G. Howard, II at the Office of Rate Intervention.

Please indicate receipt of this filing by your office by placing your file stamp on the extra copy and returning to me via the enclosed, self-addressed stamped envelope.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 31 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INQUIRY INTO LIMITATIONS)
Of USE FOR TARIFFED SERVICES) ADMINISTRATIVE
DESIGNATED OR OTHERWISE) CASE NO. 2005-00186
REFERRED TO AS UNLIMITED)

**RESPONSES OF MOMENTUM TELECOM TO THE ATTORNEY GENERAL'S
SUPPLEMENTAL REQUESTS FOR INFORMATION**

Momentum Telecom, Inc. ("Momentum") provides the following responses to the Attorney General's supplemental data requests.

REQUEST NO. 1: State whether your company has changed any tariffs applicable to plans described, named or marketed as "unlimited", as previously identified in your responses to the Commission's first data request, since the date of the Commission's first set of data Requests, and if so, please attach / enclose copies of same.

RESPONSE:

Yes. Rates for MomentumFamilySM were adjusted via tariff filing effective May 1, 2006.

Third Revised Page 51 is provided as an exhibit.

REQUEST NO. 2: With regard to any such plans, state specifically whether the word "unlimited" refers to minutes of use, area(s) of calling, or both. If the word "unlimited" modifies any other term(s) in the applicable tariff(s), please identify the term(s) so modified.

RESPONSE: The word "unlimited" refers to residential voice calling. For residential voice calling there are no limits on usage, for either local or long distance calling. Thus, the word "unlimited" refers both to minutes of voice calling and to geographic areas of calling. The term "unlimited" does not modify any other term in the tariff.

All MomentumFamilySM products are designed for residential voice calling only. As set forth on Original Page 40 of Momentum's PSC Tariff No. 1, these products are not intended for phone lines that are connected to the Internet for extended periods of time. The tariff provides that if usage is not consistent with residential voice applications,

REQUEST NO. 3: With regard to any such plans, state:

- a. whether the tariff indicates that a penalty of any type or sort (including relegating the customer to a different plan) may apply in the event the customer exceeds any limitation on number of minutes in the plan;

RESPONSE: Momentum's tariff provides that if usage is not consistent with residential voice applications Momentum may immediately suspend, restrict or cancel the customer's service without prior notice and assess an additional \$50.00 monthly recurring charge for each month in which such usage occurred. The tariff provides that incidental Internet and other data usage is permitted, provided however, that any usage in excess of 5,000 minutes per month shall be presumed to be not consistent with residential voice applications.

- b. the nature of the penalty;

RESPONSE: See response to Request 3.a.

- c. whether the penalty has ever been imposed;


RESPONSE: Momentum has applied its tariffed conditions of service. However, no customer has ever been disconnected for violating the tariffed limitations of service for MomentumFamilySM.

- d. whether notice of the penalty is provided to the consumer, and if so, identify precisely where in the tariff or other materials (including but not limited to contract, advertising or marketing materials) any such notice is located, and cite the complete language of any and all such notice(s).

RESPONSE: Yes, the customer is given notice by the sales representative and by a

welcome packet (provided in Response to PSC data request No. 3) which provides detailed information about the customer's service plan and features. Additionally, the conditions of the plan are clearly outlined in the terms and conditions on Momentum's website, at http://www.momentumtelecom.com/terms_service.asp.

Respectfully submitted,

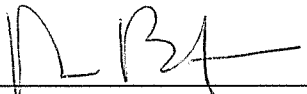


C. Kent Hatfield
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
(502) 568-5734

COUNSEL FOR MOMENTUM TELECOM

CERTIFICATE OF SERVICE

A copy of the foregoing was served this 27th day of July, 2006 first class, United States mail, postage prepaid, upon Dennis G. Howard, II, Assistant Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204.



Douglas F. Brent

**Administrative Case No. 2005-00186; Momentum Telecom's
Responses to Attorney General's Supplemental Data Requests**

Exhibit 1 - Referenced Tariff Page

All long distance calls with the Momentum**FamilySM** Programs are domestic 1+ interstate and intrastate calling, which will be billed in whole minute increments. Any fractional minutes will be rounded to the nearest whole penny. Unused minutes will not roll over to the next month.

Residence subscriber can receive additional discounts through the Momentum**FamilySM** Referral Program. A then current base of twenty (20) or more active residence referral customers at the time of billing will entitle the residence customer to receive 100% discount on their chosen package applicable rate, although applicable taxes and surcharges would still apply.

7.2.1 MomentumFamilysm Packages

	Zone 1	Zone 2	Zone 3
Momentum FamilySM 60 Program, per month	\$33.95(I)	\$36.95(I)	\$64.95(I)
Momentum FamilySM Unlimited, per month	\$49.95(I)	\$49.95(I)	\$69.95(I)

Existing MomentumFamily customers with promotional rates will increase \$1.00 per month (I) per line effective January 8, 2005.

7.2.1.1 Optional Calling Services, per line

LATA wide calling	Included	
Privacy Manager	\$5.95	
Voice Mail Package	\$5.95	
Inside Wire Maintenance	\$3.95	
Hunting	\$5.00	
Additional Line (no feature)	\$26.95	(I)
Remote Call Forwarding	\$15.00	
Directory Listings		
Additional Listings, per month	\$2.50	
Non-Published service charge, per month	\$3.50	
Non-listed service charge, per month:	\$2.50	
Per use feature charge	\$0.75	
Additional RingPlus or feature per package	\$2.00	
Calling card, \$1.00 per call plus \$.15 per minute		

Issued: March 31, 2006

Effective: May 1, 2006

Issued by: Alan L. Creighton, President and Chief Executive Officer
 Momentum Telecom, Inc.
 2700 Corporate Drive, Suite 200
 Birmingham, Alabama 35242
 1-800-466-2210

