

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

TOUCHTONE COMMUNICATIONS, INC.)
 and ALEC, Inc.,)
)
 Complainants,)
)
 vs.)
)
 KENTUCKY ALLTEL, Inc.,)
)
 Defendant.)

Case No.
 2005-00482

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 PUBLIC SERVICE
 COMMISSION

ALEC’S RESPONSES TO WINDSTREAM’S FIRST SET OF DATA REQUESTS

Come now the Complainants, Touchtone Communications, Inc., and ALEC, Inc. (collectively “ALEC”), by and through counsel, and for their responses to the First set of Data Requests of Defendant, Windstream Kentucky East, Inc. f/k/a Kentucky ALLTEL, Inc., state as follows:

DATA REQUEST NO. 1: Provide a copy of all calculations, exhibits, memoranda, records, rates, spreadsheets, and other documents that support, detail, and explain the reciprocal compensation amount of \$1,862,583.98 alleged in Paragraph 20 of ALEC's Amended Formal Complaint.

RESPONSE: This information has already been provided under separate cover prior to receipt of this First Set of Data Requests as exhibits to the Complaint filed herein. For Windstream’s benefit as well as the Commission’s benefit, please find attached updated data as of October 3, 2006 attached hereto electronically.

DATA REQUEST NO. 2: Provide a copy of all calculations, exhibits, memoranda, records, rates, spreadsheets, and other documents that support, detail, and explain the non-PLU traffic amount of \$4,934,466.16 alleged in Paragraph 48 of ALEC's Amended Formal Complaint.

RESPONSE: See response to Data Request No. 1 and attached CD.

DATA REQUEST NO. 3: Provide copies of all invoices for reciprocal compensation and non-local traffic submitted to Verizon South, Inc. (Windstream's immediate predecessor) in May and June 2002 by ALEC, its predecessors, consultants, agents, or affiliates pursuant to the Interconnection Agreement between ALEC and Verizon South, Inc., approved by the Commission on August 26, 1999 in Case No. 99-318.

RESPONSE: ALEC has no copies of the invoices provided to Verizon for terminating services prior to the purchase of the Verizon property by ALLTEL. This was prior to the current management of ALEC. The data in ALEC's possession regarding these transactions is the Verizon control numbers associated with payment and the payment amounts, attached hereto.

DATA REQUEST NO. 4: Provide a copy of all calculations, exhibits, memoranda, records, rates, spreadsheets, and other documents that support, detail, and explain the invoices provided in your response to Data Request No.3 above.

RESPONSE: See response to Data Request No. 3 and attached CD.

DATA REQUEST NO. 5: Provide a copy of all agreements, exhibits, memoranda, records or other documents that describe and detail the relationship between ALEC, its predecessors and affiliates, and Richard McDaniel, including but not limited to all retainer agreements.

RESPONSE: Richard McDaniel was at first an employee of Duro Communications and then became an ALEC employee after Duro purchased ALEC. In 2002, he left ALEC and became a consultant.

In that capacity he provided services to both ALEC and what had been the old Duro management group that was no longer associated with ALEC. It was in his capacity for the Duro group that he brokered payment from ALLTEL to the Duro group. The ALEC management group was not aware of this activity until this year when ALLTEL informed them of such. The payment that was made by ALLTEL to the Duro group was for a three or four month period in 2002.

In response to this Data Request, ALEC is not currently and knowingly in possession of any documents as requested.

DATA REQUEST NO. 6: Provide a list and corporate chart that detail and describe the relationship as of the end of June for each year from 2002 through 2006 with respect to ALEC and each of its predecessors, successors, parent companies, subsidiaries, holding companies, affiliates, and other similarly related entities. Include in your response the legal name of each entity identified and each entity's former name(s), assumed name(s), and state(s) of domestic and foreign incorporation where applicable.

RESPONSE: Please see attached CD.

DATA REQUEST NO. 7: Provide the same information as requested in Data Request No.6 above for year end December 2006.

RESPONSE: There has not been a change, to ALEC's knowledge, from the chart provided in response to Data Request No. 6.

DATA REQUEST NO. 8: Provide full 210 character usage EMI records for August 2006 and include, at a minimum, the following fields with respect to each record:

- a. All carrier usage and not just that usage that is specific to Windstream;
- b. "From" telephone number (positions 15 through 24 of an 11-01-01 EMI Record);
- c. "To" telephone number (Positions 30 through 39 of an 11-01-01 EMI Record);
- d. Date of call (positions 7 through 12 of an 11-01-01 EMI Record);

- e. Minutes (positions 61 through 67 of an 11-01-01 EMI Record);
- f. Carrier Identification Code ("CIC") (positions 46 through 49 of an 11-01-01 EMI Record);
- g. "From" Local Routing Number ("LRN") (positions 157 through 166 of an 11-01-01 EMI Record);
- h. "To" LRN (positions 172 through 181 of an 11-01-01 EMI Record);
- i. Method of Recording Field (positions 68 and 69 of an 11-01-01 EMI Record); and
- j. Connect Time (positions 55 through 60 of an 11-01-01 EMI Record).

RESPONSE: See attached CD.

Respectfully submitted,



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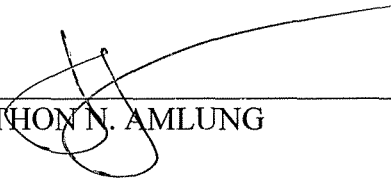
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Attorneys for Complainants

CERTIFICATE OF SERVICE

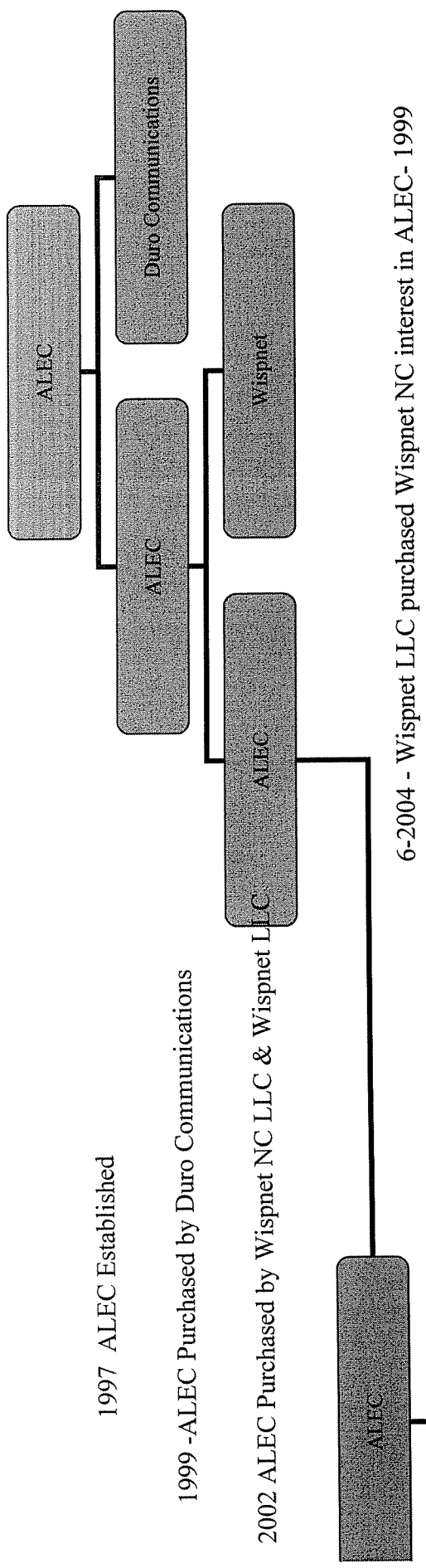
I hereby certify that a true and correct copy of the foregoing was served upon the following via regular U.S. Mail, postage pre-paid, this the 12th day of January, 2007:

Hon. Mark Overstreet
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634



JONATHON N. AMLUNG

Corporate History (1999-Present)

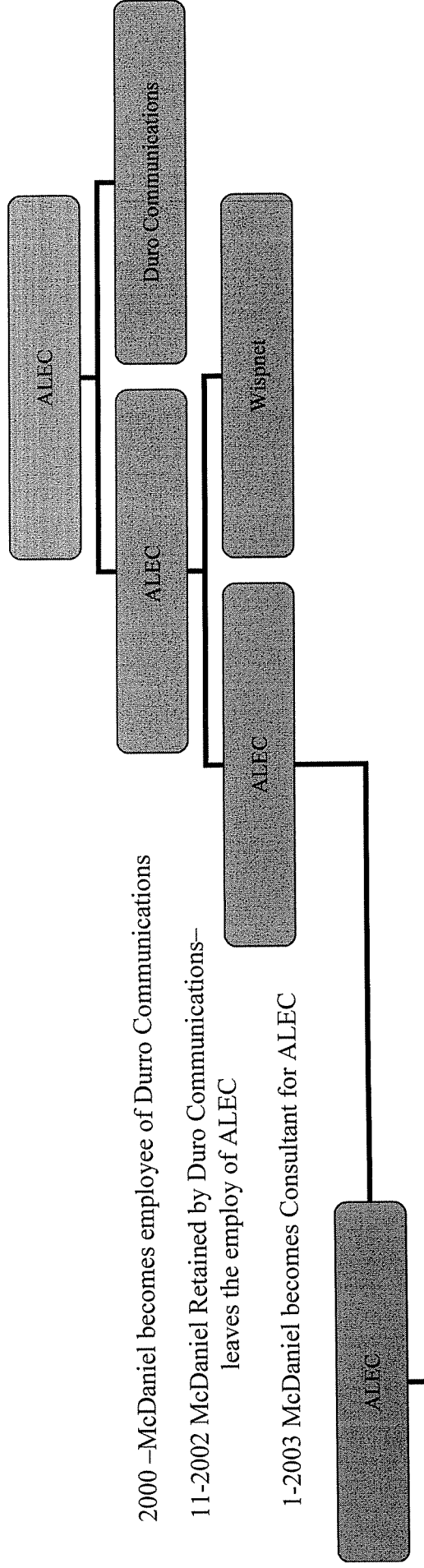


Richard McDaniel History

2000 – McDaniel becomes employee of Duro Communications

11-2002 McDaniel Retained by Duro Communications –
leaves the employ of ALEC

1-2003 McDaniel becomes Consultant for ALEC



Touchtone/Verizon Invoices for MOU

| Invoice# | Control# | Transaction Amount |
|------------|-----------|--------------------|
| 200201-1 | 911268917 | \$16,568.01 |
| 200201-2 | 911268917 | \$19,560.45 |
| 200201-3 | 911268917 | \$15,564.69 |
| 200202 | 11271466 | \$19,327.50 |
| 200203 | 911274379 | \$18,818.60 |
| TU200204-1 | 911278904 | \$17,860.86 |
| TU200205-1 | 911283550 | \$14,111.80 |
| TU200206-1 | 91129237 | \$18,295.40 |
| TU200207-1 | 911293125 | \$19,603.78 |

Total Paid \$159,711.09

Monthly Average \$17,745.68

Verizon ALEC Payments (pre Alltel)