

- “ALEC” means Touchstone, d/b/a ALEC, Inc., its subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of ALEC.
- “Affiliate” is defined as found in the Federal Telecommunications Act of 1996 (“the Act”). Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.” (47 U.S.C. §153(1).)
- “Document” shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in the full or partial possession, custody or control of ALEC, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original.
- “Referring” or “relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- “And” and “or” as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction shall serve to bring within the scope

of these discovery requests any information that would otherwise not be brought within their scope.

- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by these discovery requests, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:
 - a. the type of document (e.g., letter, memorandum, etc.);
 - b. the date of the document;
 - c. the title or label of the document;
 - d. the identity of the document originator;
 - e. the identity of each person to whom the document was sent;
 - f. a summary of the contents of the document; and
 - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

If you contend that any response to any request for information or production of document may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a. the privilege asserted and its basis;
- b. the nature of the information withheld; and
- c. the subject matter of the document, except to the extent that you claim it is privileged.

These discovery requests are to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. These discovery requests

are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documentation may be obtained.

To the extent that the specific document, workpaper, or information as requested does not exist, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information. In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

If any request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully. If any request appears confusing, please request clarification directly from counsel for Windstream.

These requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known.

For each request, provide the name of the ALEC witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

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.

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.

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.

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.

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.

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.

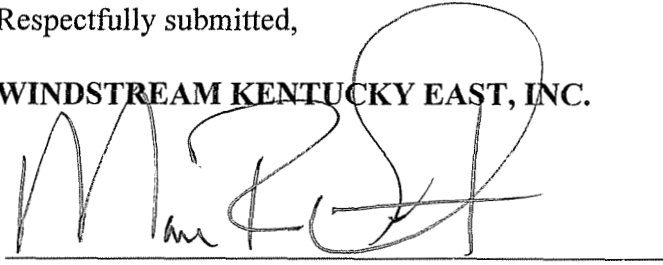
DATA REQUEST NO. 7: Provide the same information as requested in Data Request No. 6 above for year end December 2006.

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).

Respectfully submitted,

WINDSTREAM KENTUCKY EAST, INC.

A handwritten signature in black ink, appearing to read 'MRO', is written over a horizontal line. The signature is stylized and cursive.

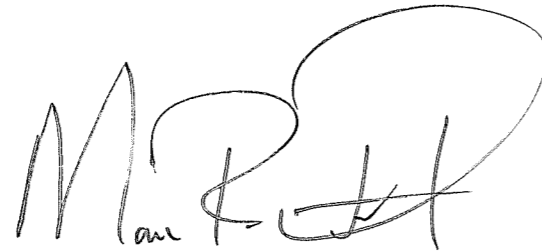
Mark R. Overstreet
STITES & HARBISON, PLLC
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Frankfort, KY 40602-0634
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 21st day of December, 2006 upon:

Jonathon A. Amlung
Amlung Law Offices
616 South Fifth Street
Louisville, Kentucky 40202

Kristofer E. Twomey
Law Offices of Kristopher E. Twomey
1725 I Street NW
Suite 300
Washington, D.C.

A handwritten signature in black ink, appearing to read "Mark R. Overstreet". The signature is written in a cursive style with a large, prominent "M" and "R".

Mark R. Overstreet

KE242:00KE1:15065:1:FRANKFORT