

John E. Selent 502-540-2315 john.selent@dinslaw.com RECEIVED
SEP 1 8 2006
PUBLIC SERVICE
COMMISSION

September 14, 2006

Hon. Beth O'Donnell Executive Director Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40601

Re: In the Matter of: Mountain Rural Telephone Cooperative Corporation, Inc. v. Kentucky Alltel, Inc., before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2006-00198

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and ten (10) copies of Mountain Rural Telephone Cooperative Corporation, Inc.'s Data Requests to Windstream East, Inc.

Thank you, and if you have any questions, please call me.

Very truly yours,

John E. Selent

DINSMORE & SHOHL LLP

JES/bmt Enclosure

cc:

Daniel Logsdon, Esq. Mark R. Overstreet, Esq.

> 1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202 502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

| MOUNTAIN RURAL TELEPHONE |) | |
|-------------------------------|--------|------------------|
| COOPERATIVE CORPORATION, INC. |) | |
| Complainant |) | |
| |) | |
| v. |) Case | e No. 2006-00198 |
| |) | |
| KENTUCKY ALLTEL, INC. |) | |
| Defendant |) | |
| |) | |
| | | |

MOUNTAIN RURAL'S DATA REQUESTS TO WINDSTREAM

Mountain Rural Telephone Cooperative Corporation, Inc., d/b/a Mountain Telephone ("Mountain Telephone"), by counsel, and pursuant to the September 1, 2006 Procedural Schedule entered by the Kentucky Public Service Commission (the "Commission") in the present case, hereby submits its data requests to Windstream East, Inc. ("Windstream").

REQUEST NO. 1: State each and every factual and legal basis for Windstream's refusal to pay the traffic sensitive portion of Mountain Rural's switched access service charges.

RESPONSE:

In the Matter of:

REQUEST NO. 2: State each and every factual and legal basis for Windstream's refusal to pay the facilities charges portion of Mountain Rural's switched access service charges.

RESPONSE:

REQUEST NO. 3: State each and every factual and legal basis for Windstream's refusal to pay the Non-Traffic Sensitive Revenue ("NTSR") portion of Mountain Rural's switched access service charges.

RESPONSE:

REQUEST NO. 4: If you contend that Windstream's ACS minutes are not subject to all three components of Mountain Rural's switched access service charges as identified in the previous three data requests, state each and every factual and legal basis for that contention. Your explanation should separately address each component of Mountain Rural's switched access service charges.

RESPONSE:

Respectfully submitted,

John E. Seient Edward T. Depp Holly C. Wallace

DINSMORE & SHOHL LLP 500 West Jefferson Street 1400 PNC Plaza Louisville, Kentucky 40202 (502) 540-2300 (tel.) (502) 585-2207 (fax)

COUNSEL TO MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing was served by mailing a copy of the same by First Class United States mail, postage prepaid, to Daniel Logsdon, Esq., Alltel Kentucky, Inc., 229 Lees Valley Road, Shepherdsville, KY 40165 and Mark R. Overstreet, Esq., Stites & Harbison, 421 W. Main Street, P.O. Box 634, Frankfort, KY 40602-0634, this

COUNSEL TO MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

113595v1