

COMMONWELATH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

- Petition of Ballard Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 ) Case No. 2006-00215
- Petition of Duo County Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Celco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 ) Case No. 2006-00217
- Petition of Logan Telephone Cooperative Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 ) Case No. 2006-00218
- Petition of West Kentucky Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 ) Case No. 2006-00220

**RESPONSE OF ALLTEL COMMUNICATIONS, INC. TO THE  
SUPPLEMENTAL INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS SUBMITTED BY BALLARD, DUO COUNTY, LOGAN, AND  
WEST KENTUCKY**

Alltel Communications, Inc. ("Alltel") hereby files this response to the

"Supplemental Interrogatories and Requests for Production of Documents to CMRS

Carriers” served on Alltel by Ballard Rural Telephone Cooperative Corporation, Inc. (“Ballard”), Duo County Telephone Cooperative Corporation, Inc. (“Duo County”), West Kentucky Rural Telephone Cooperative Corporation, Inc. (“West Kentucky”) and Logan Telephone Cooperative, Inc. (“Logan”) (collectively, the RLECs”) by letter dated September 22, 2006.

### **INTERROGATORIES**

1. Identify each person who participated in the consideration and preparation of your answers to these Discovery Requests and identify to which particular Discovery Request each person was involved in answering.

**ANSWER:** Mr. Ron L. Williams.

2. State whether you have existing physical interconnection with the network(s) of any telecommunications service provider in the local exchange area of the Company; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and identify the entity (if any) with which you have such physical interconnection.

**ANSWER:** Alltel does not have physical interconnection with any telecommunications service provider in the local exchange area of RLECs for the purpose of exchanging 251(b)(5) traffic with them.

3. State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the Commonwealth of Kentucky; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which the CMRS Carriers have such physical interconnection.

**ANSWER:** Alltel is physically interconnected with BellSouth and Windstream. Alltel only utilizes transiting service provided by BellSouth to exchange traffic with Petitioners. The locations of Alltel's physical interconnections with BellSouth are as follows:

BellSouth Owensboro CO: BellSouth trgrp 410

BellSouth Madisonville CO: BellSouth trgrp 298

4. State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the MTA('s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER:** See answer to Interrogatory 3 above.

5. State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the LATA('s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER:** See answer to Interrogatory 3 above.

6. With respect to each MTA within which you provide service, identify and describe the extent to which CMRS service coverage is made available within the Company's local exchange service area(s).

**ANSWER:** Alltel operates and provides service in the following MSA license areas that are wholly or partially within Kentucky: Louisville, Memphis-Jackson, Louisville-Lexington-Evansville, Owensboro and Huntington-Ashland.

7. Identify the location of every antenna by which you provide CMRS service in the MTA(s) within which the Company is located.

**ANSWER:** Alltel objects to this request as it requires the production of information that is available to Petitioners in the public records of the Federal Communications Commission. Without waving the above objection, Alltel responds as follows: This information is available on the FCC's website at: <http://gullfoss2.fcc.gov/cgi-bin/ws.exe/genmen/index.hts>

8. Identify the location of every antenna by which you provide CMRS service in each MTA in the Commonwealth of Kentucky. For each such location identified, identify the corresponding MTA in which such antenna is located.

**ANSWER:** See answer to Interrogatory 7 above.

9. State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with BellSouth or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER:** The transit relationship was established prior to Alltel's acquisition of the relevant network system and therefore Alltel has no knowledge with respect to the date upon which this now Alltel network first sought to deliver traffic to the Company by means of a transit relationship with BellSouth or Windstream. Any traffic that Alltel exchanges with Petitioners is via these transit relationships.

10. State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with Windstream or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER:** Alltel has determined that Windstream is not used to deliver traffic to Petitioners.

11. State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with any third-party (other than those identified in the preceding two interrogatories) ("transit service provider"), identify the transit service provider through which this delivery was sought to be accomplished, and state whether the transit service provider permitted such attempted transit traffic delivery to the Company.

**ANSWER:** See answer to Interrogatory 9 above.

12. Identify all agreements by which you first sought to deliver traffic to the Company by means of the transit arrangements described in the preceding three interrogatories. If no such agreements exist, so state your answer. If such traffic delivery was sought to be accomplished pursuant to an unwritten agreement, describe the terms of such agreement, identify the date (or approximate date, if no exact date is available) of such agreement, and identify all persons involved in negotiating such agreement for you and the third-party.

**ANSWER:** To the extent that Alltel traffic is delivered to the Petitioners, see Alltel's answer to Interrogatory 8 in its response the first set of "Interrogatories and Requests for Production of Documents to CMRS Carriers" served by Petitioners.

13. For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, indicate (for each transit service provider) the percentage of your traffic transited to the Company that is: (i) Type I interconnection traffic; and (ii) Type II interconnection traffic.

**ANSWER:** To the extent that Alltel traffic is delivered to Petitioners, Alltel currently utilizes transiting service provided by BellSouth to deliver traffic to Petitioners. Alltel maintains no Type 1 numbers in Kentucky and 100% of any traffic transited to Petitioners from Alltel's network via BellSouth in Kentucky is Type II interconnection traffic.

14. For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, identify (for each transit service provider) the scope of geographic areas from which your end-users originate such traffic.

**ANSWER:** See answer to Interrogatory 6 above.

15. For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please indicate (for each transit service provider): (i) what call detail records you create; (ii) what call detail records you create and provide to the transit service provider; and (iii) what call detail records you create and provide to the Company.

**ANSWER:** Alltel does not create nor provide call detail records to transit service providers or Petitioners. It is Alltel's understanding that BellSouth provides Petitioners

with Category 110101 records that identify the originating carrier for traffic delivered to each Petitioner via BellSouth in Kentucky.

16. For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please describe (for each transit service provider) the specific interconnection trunking arrangement that you have in place with the transit service provider for the delivery, transit, and receipt of traffic to and from the Company. For purposes of this interrogatory, the phrase "specific interconnection trunking arrangement" should be construed to include, but not be limited to, information regarding whether such trunks are dedicated solely for the delivery and receipt of mobile CMRS traffic.

**ANSWER:** See answer to Interrogatory 3 above. Every Alltel 'interconnection trunking arrangement' noted in Interrogatory 3 are solely for the originating and termination of CMRS traffic.

17. Identify and describe all call detail record you provide to (i) any transit service provider identified in the preceding interrogatories, or (ii) the Company, and state whether such records can be used to determine the location of the cellular site serving your end-user customer(s) at the beginning of each call placed or received by your end-user customer.

**ANSWER:** See answer to Interrogatory 15 above.

#### **IV. REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce all documents identified in, referenced, referred to, reviewed, consulted, or relied upon in any way in responding to any of the Interrogatories or Requests for Admission propounded herein.

**RESPONSE:** Alltel objects to this interrogatory as overly broad and burdensome as it asks for “all documents”; however, without waiving said objection, Alltel directs Petitioners to the FCC website previously identified above and to the interconnection agreement with BellSouth also previously referenced. If Petitioners are not able to access the FCC website please contact counsel for Alltel, Stephen Rowell at 501 905 8460.

2. Provide representative call detail records for all call detail records identified in answer to Interrogatories 15 and 17.

**RESPONSE:** See answers to Interrogatory 15 and Interrogatory 17.

3. Provide all documentation (including, but not limited to, source documentation) used to determine the percentages of Type 1 and Type II interconnection traffic you transit to the Company.

**RESPONSE:** See answer to Interrogatory 13.



Dated: September 22, 2006

By:

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line.

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COUNSEL FOR:  
ALLTEL COMMUNICATIONS, INC.


**Verification**

**AFFIDAVIT OF RON L. WILLIAMS**

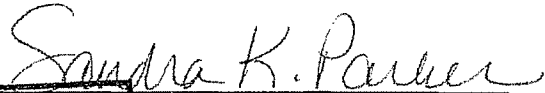
BEFORE ME, the undersigned authority, on this 21st day of September, 2006, personally appeared Ron L. Williams, who being by me duly sworn on oath deposed and said:

1. My name is Ron L. Williams. My position is Vice President - Interconnection.
2. I have prepared the responses to the attached Interrogatories and Requests for Production of Documents.
3. To the best of my knowledge, these responses are true and correct.

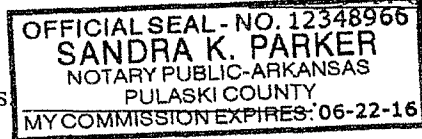
Further Affiant sayeth not.

  
\_\_\_\_\_  
Ron L. Williams

Sworn to and subscribed to before me this 21st day of September, 2006, to certify which witness my hand and seal.

  
\_\_\_\_\_  
Sandra K. Parker

My Commission Expires



## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Response of Alltel Communications, Inc. to the Supplemental Interrogatories and Request for Production of Documents Submitted by Ballard, Duo County, Logan and West Kentucky was served via United States First Class Mail, postage prepaid, upon:

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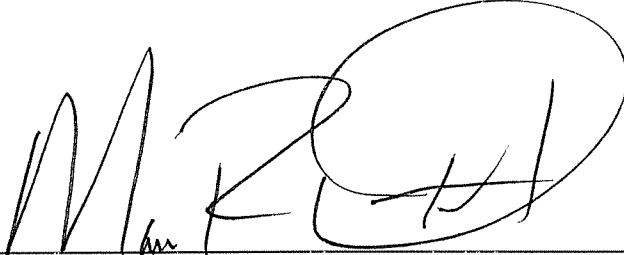
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on this the 22<sup>nd</sup> day of September, 2006.



Mark R. Overstreet