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NOV 16 2006

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COMMISSION

November 15, 2006

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Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd., PO Box 615
Frankfort, KY 40602

Re: *Petition of SouthEast Tel., Inc., for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection Under the Telecommunications Act of 1996, Case No. 2006-00316*

Dear Ms. O'Donnell:

SouthEast Telephone, Inc. ("SouthEast") submits this letter pursuant to the Commission's Oct. 23, 2006 procedural order, which establishes that supplemental requests for information should be filed by today, and as a follow-up to SouthEast's pending Motion to Compel Responses to Data Requests, filed on Oct. 17, 2006.

SouthEast had anticipated having an opportunity to consider potential rate proposals for geographically deaveraged loops (Issue A-2) and unbundled switching (Issue A-3) by evaluating forward-looking cost data to be provided by BellSouth. However, BellSouth has refused to make available the needed cost data. Indeed, the company refused to respond to 48 of 49 of SouthEast's data requests. *See* BellSouth Responses and Objections to SouthEast's First Set of Data Requests (filed Sept. 29, 2006).

Given this lack of needed cost data, SouthEast's witness, Mr. Joseph Gillan, submitted Direct Testimony on Nov. 3, 2006 that offered a methodology for setting unbundled switching rates (Issue A-3) based on publicly available data regarding BellSouth's embedded or historical costs. Gillan Direct Testimony at 25-34. With regard to geographically deaveraged loop rates (Issue A-2), Mr. Gillan's testimony offered a methodology that would derive the new deaveraged loop rates in each zone from the cost analysis conducted by the Commission in its 2001 decision in Administrative Case No. 382, using a reformed set of assignments of wire centers to zones, and taking into account the federal universal service high cost support available to carriers serving customers in higher-cost wire centers. Gillan Direct Testimony at 23-25.

In order to precisely determine specific loop rates based on this methodology, SouthEast (and the Commission) would need, at a minimum, BellSouth's responses to the first four of SouthEast's original data requests:

- 1. Please provide, in electronic spreadsheet form, the monthly cost per line, by wire center, for each analog loop type (SL1, SL2, UCL, UNE-P, etc.) relied upon by the Kentucky PSC in setting final costs and rates in Administrative Case No. 382.*
- 2. Please provide, in electronic spreadsheet form, the number of switched access lines, by wire center, used by the Kentucky PSC in Administrative Case No. 382 to establish the weighted average cost of analog loops by UNE zone (as referenced in the preceding data request). Identify the vintage of the data.*
- 3. Please provide, in electronic spreadsheet form, the number of switched access lines (calculated using an identical definition as used in answer to the preceding data request) by wire center as of December 31, 2005.*
- 4. Provide, in electronic spreadsheet form, the number of UNE-P lines, separately for residential and business customers, by wire center, as of the end of each year, 2001 through 2005.*

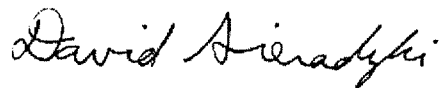
SouthEast respectfully requests that, at a minimum, the Commission immediately compel BellSouth to provide substantive responses to these four data requests on an expedited basis.

SouthEast's witness, Mr. Steven E. Turner, also demonstrated the need for a broader reexamination of the reasonableness of BellSouth's loop rates, particularly given the significant reductions in loop costs industry-wide since the Commission's last generic UNE rate proceeding. *See Turner Direct Testimony at 30-37.*

At this time, SouthEast does not have any supplemental data requests with regard to the direct testimony of BellSouth's witness, Ms. Pamela A. Tipton, filed on Nov. 3, 2006.

Please contact me if you have any questions.

Respectfully submitted,



David L. Sieradzki
Counsel for SouthEast Telephone, Inc.

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cc: Amy E. Dougherty
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