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RECEIVED

June 24, 2008

JUN 25 2008

PUBLIC SERVICE
COMMISSION

VIA OVERNIGHT MAIL

Ms. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: South Central Telcom LLC, Complainant v. BellSouth
Telecommunications, Inc., Defendant
PSC 2006-00448

Dear Ms. Stumbo:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's Supplemental Data Requests to South Central Telcom.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

cc: Party of Record

714502

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUN 25 2008
PUBLIC SERVICE
COMMISSION

In the Matter of:

SOUTH CENTRAL TELCOM, LLC)
)
COMPLAINANT)
)
V.) CASE NO. 2006-00448
)
BELLSOUTH TELECOMMUNICATIONS, INC.)
)
DEFENDANT)

BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T KENTUCKY'S SUPPLEMENTAL DATA
REQUESTS TO SOUTH CENTRAL TELCOM, LLC

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to the Order of the Kentucky Public Service Commission dated May 21, 2008, hereby serves its Supplemental Data Requests numbered 1 – 22 to South Central Telcom, LLC ("South Central Telcom").

INSTRUCTIONS

(a) If any response required by way of answer to these Supplemental Data Requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion. If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each

person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(b) These Supplemental Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(c) If a Supplemental Data Request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Supplemental Data Request, answer all parts of the Supplemental Data Request to which you do not object, and as to each part to which you object, separately set forth the specific basis for the objection.

(d) These Supplemental Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Supplemental Data Requests subsequently become known or should your initial response be incorrect or untrue.

(e) For each Supplemental Data Request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DEFINITIONS

(a) "South Central Telcom" means, unless otherwise indicated, South Central Telcom, LLC, the competitive local exchange carrier, any predecessors in interest, its parents, subsidiaries, and affiliates, its present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of South Central Telcom.

(b) "AT&T Kentucky" means BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky.

(c) "You" and "your" refer to South Central Telcom.

(d) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(e) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(f) The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of South Central Telcom, including, but not limited to, correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail ("Email") files, and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

(g) The phrases "refer to" and "relate to" mean 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.

SUPPLEMENTAL DATA REQUESTS

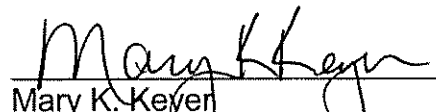
1. Define "toll traffic" as used by South Central Telcom in its response to AT&T Kentucky's First Data Requests, Question No. 3.
2. Does "toll traffic" as used by South Central Telcom in its response to AT&T Kentucky's First Data Requests, Question No. 3 include traffic originated by an independent telephone company and transited by AT&T Kentucky?
3. Does "toll traffic" as used by South Central Telcom in its response to AT&T Kentucky's First Data Requests, Question No. 3 include traffic originated by a CLEC and transited by AT&T Kentucky?
4. Do "exchange access" as defined in 47 U.S.C. 3(16) and "toll traffic" as used by South Central Telcom in its response to AT&T Kentucky's First Data Requests, Question No. 3 mean the same thing to South Central Telcom? If not, explain with specificity the difference in the two terms.
5. Admit or deny that AT&T Kentucky is not certificated as an interexchange carrier in Kentucky. If denied, please fully explain the basis for your denial.
6. Is traffic originated by an independent telephone company that is transported by AT&T Kentucky to South Central Telcom transit traffic? If your response is anything other than an unqualified "yes" please explain.
7. Is traffic originated by a CLEC that is transported by AT&T Kentucky to South Central Telcom transit traffic? If your response is anything other than an unqualified "yes," please explain.
8. Does the sum South Central Telcom is seeking to recover from AT&T Kentucky in this case include amounts for traffic originated by an independent telephone company and transported by AT&T Kentucky to South Central Telcom? If so, please explain the difference in South Central Telcom's view between amounts originated by an independent telephone company and amounts originated by a CMRS provider?

9. Does the sum South Central Telcom is seeking to recover from AT&T Kentucky in this case include amounts for traffic originated by a CLEC and transported by AT&T Kentucky to South Central Telcom? If so, please explain the difference in South Central Telcom's view between amounts originated by a CLEC and amounts originated by a CMRS provider?
10. Admit or deny the following statement: South Central Telcom is entitled to bill AT&T Kentucky out of South Central Telcom's switched access tariff for traffic originated by an independent telephone company and transited by AT&T Kentucky to South Central Telcom. If admitted, please explain the difference between traffic originated by an independent telephone company and traffic originated by a CMRS-provider for which South Central Telcom is not seeking payment out of its switched access tariff.
11. Admit or deny the following statement: South Central Telcom is entitled to bill AT&T Kentucky out of South Central Telcom's switched access tariff for traffic originated by a CLEC and transited by AT&T Kentucky to South Central Telecom. If admitted, please explain the difference between traffic originated by a CLEC and traffic originated by a CMRS-provider for which South Central Telcom is not seeking payment out of its switched access tariff.
12. Admit or deny the following statement: South Central Telcom is not seeking to recover payment from AT&T Kentucky under its switched access tariff for CMRS-originated traffic. If denied, please fully explain the basis for your denial.
13. Admit or deny the following statement: South Central Telcom's switched access tariff is not available to local exchange carriers. If denied, please fully explain the basis for your denial.
14. Identify by circuit identification number, or any other applicable specific identification method, each and every facility South Central Telcom alleges AT&T Kentucky has purchased out of South Central Telcom's switched access tariff.
15. Admit or deny the following statement: The transport facilities used by AT&T Kentucky to deliver the traffic at issue in this case to South Central Telcom are owned by South Central Rural Telephone Cooperative Corporation, Inc. If denied, please fully explain the basis for your denial.
16. Admit or deny the following statement: The switch termination function for the traffic at issue in this case is performed by South Central Rural Telephone Cooperative Corporation, Inc. If denied, please fully explain the basis for your denial.
17. State with specificity (a) the sum South Central Telcom is seeking from AT&T Kentucky in this case; (b) the calculation resulting in the sum set forth in (a); and

(c) all documents supporting the sum set forth in (a) and the calculation set forth in (b).

18. Please describe with specificity the financial arrangement between South Central Telcom and South Central Rural Telephone Cooperative Corporation, Inc. pursuant to which South Central Telcom is terminating toll traffic for South Central Rural Telephone Cooperative Corporation, Inc.
19. Does South Central Rural Telephone Cooperative Corporation, Inc. pay the rates set forth in South Central Telcom's switched access tariff for toll traffic from South Central Rural Telephone Cooperative Corporation, Inc. terminated by South Central Telcom? If not, please set forth the rates paid by South Central Rural Telephone Cooperative Corporation, Inc.
20. Please set forth every specific tariff provision in the South Central Telcom switched access tariff from which South Central Telcom contends AT&T Kentucky used facilities or services for which it is obligated to pay South Central Telcom.
21. Please set forth every specific switched access tariff provision that South Central Telcom contends reflects facilities or services used by AT&T Kentucky to send toll traffic to South Central Telcom.
22. In South Central Telcom's June 23 letter supplementing its responses to AT&T Kentucky's First Data Requests, South Central Telcom states that "when a carrier delivers traffic over South Central Telcom's switched access facilities, South Central Telcom charges that carrier pursuant to its switched access tariff." Does South Central Telcom own the facilities over which AT&T Kentucky delivers traffic to South Central Telcom? Please produce any documents that support your response.

Respectfully submitted,



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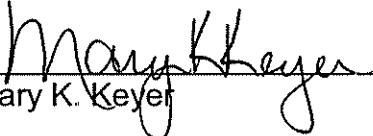
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COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.,
D/B/A AT&T KENTUCKY

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 24th day of June, 2008.

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