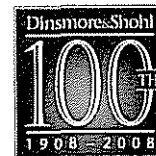


Dinsmore & Shohl LLP
ATTORNEYS

John E. Selent
502-540-2315
john.selent@dinslaw.com

June 16, 2008



RECEIVED
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PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Hon. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

**Re: *In the Matter of: South Central Telecom LLC v. BellSouth
Telecommunications, Inc., Case No. 2006-00448***

Dear Ms. Stumbo:

Enclosed for filing in the above-referenced case, please find one original and eleven (11) copies of South Central Telecom LLC's responses to BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's first data requests. Please file-stamp one copy, and return it to our courier.

South Central Telecom LLC anticipates filing the signed certification of Max Phipps shortly.

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

Very truly yours,

DINSMORE & SHOHL LLP

A handwritten signature in black ink, appearing to be "John E. Selent", written over the typed name.

John E. Selent

JES/lb
Enclosures
cc: All Parties of Record

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25122-4

Hon. Stephanie Stumbo

June 16, 2008

Page 2

bcc: Mr. Max Phipps
Mr. Donnie Bennett
Ms. Eileen Bodamer

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

SOUTH CENTRAL TELCOM LLC)
Complainant)
v.)
BELLSOUTH TELECOMMUNICATIONS,)
INC.)
Defendant)

Case No. 2006-00448

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

South Central Telcom LLC ("South Central Telcom"), by counsel, and pursuant to the May 21, 2008 procedural order entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter, hereby files its responses to BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's ("AT&T") First Data Requests to South Central Telcom, LLC. In response to those data requests, South Central Telcom states as follows.

QUESTION NO. 1: Does South Central Telcom admit that AT&T is not an interexchange carrier? If not, provide in detail the basis for your response and produce any and all documents that support it.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: No; South Central Telcom does not so admit. AT&T delivers interexchange traffic over switched access facilities to South Central Telcom. South Central Telcom further refers AT&T to the CABS records it receives monthly from South Central Telcom.

QUESTION NO. 2: How much does South Central Telcom claim AT&T has failed to pay in access charges pursuant to South Central Telcom's switched access tariffs? Produce any and all documents that support your claim.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this request as unduly burdensome because AT&T has received this information on a monthly basis (in the form of CABS bills) from South Central Telcom. Without waiving this objection, South Central Telcom refers AT&T to the CABS bills its receives monthly from South Central Telcom. Those bills specify the amount that AT&T has refused to pay.

QUESTION NO. 3: List and describe in detail the types of traffic that South Central Telcom claims are subject to access charges under South Central Telcom's switched access tariffs at issue in this case.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Toll traffic.

QUESTION NO. 4: Does South Central Telcom agree that transit traffic (in this case, traffic not originated by AT&T) is not the type of traffic subject to access charges under South Central Telcom's switched access tariffs? If no, explain in detail the basis for your response and produce any and all documents that support it.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects that this question is not reasonably calculated to lead to discovery of admissible evidence because South Central Telcom and AT&T have made no

agreement or arrangement for the exchange of third-party traffic. South Central Telcom is not aware of any responsive documentation.

QUESTION NO. 5: Does South Central Telcom agree that wireless calls originating and terminating within the same local MTA are “local” calls governed by reciprocal compensation arrangements under Sections 251 and 252 of the Telecommunications Act of 1996 and that South Central Telcom’s switched access tariff does not apply to such traffic? If not, explain in detail the basis for your response and produce any and all documents that support it.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects to this data request because it calls solely for a legal conclusion. Without waiving this objection, South Central Telcom refers AT&T to the orders of the Public Service Commission in Case No. 2006-00215 and its sister arbitration cases (the “CMRS Arbitrations”). Please also refer to the answer to data request number 3.

QUESTION NO. 6: To what type of carriers does South Central Telcom’s PSC KY Tariff No. 2 (“switched access tariff”) on file with the Kentucky Public Service Commission apply?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this question because South Central Telcom does not endorse the factual predicate of the question. Without waiving this objection, South Central Telcom states that the tariff to which the question refers does not apply to carriers. It applies to traffic and facilities. Please also refer to the answer to data request number 3.

QUESTION 7: How does South Central Telecom determine the jurisdiction of the traffic for which it bills AT&T under its switched access tariffs? Produce any and all documents relevant to this determination.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telecom takes the total volume of traffic AT&T delivers over switched access facilities, and it removes any wireless traffic reported by AT&T. The remaining traffic (with the exception of Indiana toll traffic, which is rated as interstate) is rated as intrastate access traffic. Other than possibly the CABS bills referenced in response to data request number 2, South Central Telecom is not aware of any responsive documents.

QUESTION 8: Explain what types of traffic are included in South Central Telecom's access charge claim against AT&T and produce any and all documents that support your explanation.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Please see the answers to data requests numbers 2 and 3.

QUESTION 9: Is transit traffic (traffic not originated by AT&T) included in the amount of access charges you allege AT&T owes South Central Telecom? If so, how much of the charges are for transit traffic? Produce any and all documents that support your response.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: To the best of South Central Telecom's knowledge, the answer to this question is no, and it is not aware of any responsive documents.

QUESTION 10: If your response to Data Request 9 is “no,” what process does South Central Telcom use to exclude transit traffic (traffic not originated by AT&T) from its billing to AT&T? Provide any and all documents relevant to this process.

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: Because there is no agreement or arrangement by which, or pursuant to which, any such traffic may be exchanged, identified, or quantified, South Central Telcom bills all traffic that AT&T delivers over switched access facilities just as it does all other traffic (other than CMRS traffic) delivered over switched access facilities. It bills the traffic as switched access traffic. To the best of South Central Telcom's knowledge, there are no responsive documents.

QUESTION 11: Does South Central Telcom alleges that AT&T ordered switched access facilities or services from South Central Telcom’s tariffs? If so, produce any and all orders, service orders, access service requests or other such documentation wherein AT&T placed an order with South Central Telcom for such access services.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects to this data request because it calls solely for a legal conclusion. Without waiving this objection, South Central Telcom states that no carrier, including AT&T, may use South Central Telcom’s facilities and then claim that it has not ordered those facilities. If those facilities are used, they must be paid for pursuant to the applicable tariff.

QUESTION NO. 12: If your response to Data Request No. 11 is “no,” explain in detail South Central Telcom’s basis for billing AT&T access charges pursuant to South Central Telcom’s switched access tariff rates. Provide any and all documents that support your basis.

RESPONSIBLE WITNESS: None

RESPONSE: Please see the answer to question No. 11.

QUESTION NO. 13: Does South Central Telcom accept, or has it accepted, orders from other carriers to purchase facilities or services for access from South Central Telcom pursuant to its switched access tariffs?

RESPONSIBLE WITNESS: None

RESPONSE: Please see the answer to question No. 11.

QUESTION NO. 14: If your answer to Data Request 13 is yes, what types of carriers have purchased facilities or services, and does South Central Telcom bill, or has South Central Telcom billed, those carriers?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this data request because it is not reasonable calculated to lead to the discovery of admissible evidence. Without waiving this objection, South Central Telcom states that carriers delivering interexchange traffic to South Central Telcom are billed pursuant to South Central Telcom's access tariff for the services purchased.

QUESTION NO. 15: Does South Central Telcom own a switch? If so, where? If not, what switch does South Central Telcom use to send and receive traffic?

RESPONSIBLE WITNESS: Max Phipps

RESPONSE: South Central Telcom objects to this data request because it is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, South

Central Telcom states that it does not own a switch, and that its switching is provided by South Central Rural Telephone Cooperative Corporation, Inc.

QUESTION NO. 16: Does South Central Telcom have an agreement with South Central Rural Telephone Cooperative, the incumbent local exchange carrier? If so, describe what type of agreement it is and provide a copy.

RESPONSIBLE WITNESS: Max Phipps

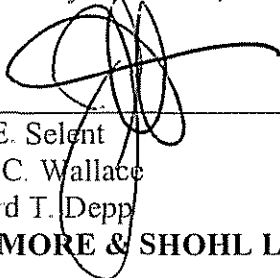
RESPONSE: South Central Telcom objects to this data request because it is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, the answer is no.

QUESTION NO. 17: On what basis does South Central Telcom take the position that an interconnection agreement is not required for interconnection between a Competitive Local Exchange Carrier and an Incumbent Local Exchange Carrier for exchange of traffic? State specific references to any regulatory orders, laws or documents that support your claim.

RESPONSIBLE WITNESS: None

RESPONSE: South Central Telcom objects to this data request because it calls solely for a legal conclusion. Without waiving this objection, South Central Telcom refers AT&T to the motion for summary judgment that South Central Telcom filed in this matter on May 23, 2007.

Respectfully submitted,



John E. Selent
Holly C. Wallace
Edward T. Depp
DINSMORE & SHOHL LLP

1400 PNC Plaza
500 West Jefferson St.
Louisville, Kentucky 40202
Tel: (502) 540-2300
Fax: (502) 585-2207

Counsel to South Central Telcom LLC

CERTIFICATION

I hereby certify that I have supervised the preparation of South Central Telcom LLC's responses to the initial data requests of AT&T and that the factual responses contained therein (and for which I am designated the responsible witness) are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry. (Legal counsel is responsible for all legal objections.)

Max Phipps,
General Manager of South Central Telcom LLC

Date: _____

CERTIFICATE OF SERVICE

I hereby certify a true and accurate copy of the foregoing was served, by first-class United States mail, sufficient postage prepaid, on the following individuals this 16th day of June, 2008.

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