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March 9, 2007

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PUBLIC SERVICE  
COMMISSION

Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**Re: Case No. 2006-00532 -- Investigation into the Emergency Procedures Used by  
Windstream Kentucky East in Response to the September 23, 2006 Outage**

Dear Ms. O'Donnell:

On behalf of Powertel/Memphis, Inc. and T-Mobile Central LLC ("T-Mobile"), we appreciate the opportunity to file additional comments as permitted by the Commission's order dated February 26. T-Mobile's positions were included in our letter dated February 9, and this letter is to reply to Windstream's response dated February 16. As discussed below, it would be reasonable for Windstream to notify all subtending wireless carriers and directly interconnected local carriers when there is a major outage like the one which occurred in Elizabethtown in September 2006.

T-Mobile relies exclusively on Windstream special access service to connect its network to cell sites within Windstream exchange territory. When this service fails, as it did in September due to flooding in a central office, traffic originating from those cell sites is blocked. Windstream has acknowledged that its carrier customers should be notified in the event of this type of outage, yet Windstream's written proposal limits notification to collocated carriers. As we have explained, that means that if the exact outage were to recur, T-Mobile would receive no notification at all.

Windstream has repeatedly claimed T-Mobile is attempting to create an unreasonably broad notification obligation which would include an indeterminate number of IXCs, CLECs, and wireless carriers who "terminate calls to Windstream customers." That is a fundamental misunderstanding of T-Mobile's proposal, which is far more limited and completely sensible.

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Windstream's confusion may relate to T-Mobile's earlier suggestion that "major wholesale customers" be notified of outages. To clarify T-Mobile's position, Windstream should be prepared to notify any carrier whose network facilities, e.g., cell sites, subtend a Windstream central office. Those are the facilities which are in effect "stranded" by an outage in the central office. Windstream should also provide notice to ILECs and CLECs who exchange local traffic directly with Windstream at the affected office. Some of these carriers may be collocated with Windstream. Windstream has admitted that collocated carriers should be notified of an outage, but has never explained why other local carriers who route or exchange traffic through the affected office have a less important interest in notification. Windstream has never disclosed how many local and wireless carriers were affected by the September outage, so it seems premature to reject as burdensome T-Mobile's proposal.

T-Mobile's concerns expressed in this proceeding have been limited to affected originating traffic – T-Mobile is not suggesting that Windstream should notify distant IXCs whose customers might try to call a Windstream customer served by an inoperative central office. And with respect to IXC customers in the affected exchanges, most of these customers will also be Windstream local service customers and will be receiving whatever information Windstream provides to its local customers.

Finally, to respond to Windstream's claim that it had never proposed notification other than to collocated carriers, review of the staff informal conference memorandum dated January 17, 2007 shows that Mr. Logsdon had discussed notification to carriers generally, through Windstream's "wholesale group," and there was no discussion at the meeting about limiting notification to collocated carriers. T-Mobile would have objected to such a limited proposal during the informal conference.

Very truly yours,

STOLL KEENON OGDEN PLLC

A handwritten signature in black ink, appearing to read "D. Brent", with a long horizontal stroke extending to the right.

Douglas F. Brent

cc: Service List

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