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February 9, 2007

RECEIVED

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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 respond to Windstream Kentucky East's ("Windstream") letters filed in this matter dated January 26 and February 8, 2007.

T-Mobile is a large wholesale customer of Windstream and relies exclusively on such services for the origination and termination of calls into the T-Mobile wireless network. T-Mobile customers were directly impacted by the Windstream East outage on September 23, 2006. As a result of the outage, some 16 cell sites which subtend the Elizabethtown central office via T1s purchased from Windstream were non-functional for 17 hours. T-Mobile customers were not able to make or receive phone calls during this time period. The Windstream T1 outages impacted some 1,485 square miles of wireless signal and approximately 3000 T-Mobile customers and individuals roaming on T-Mobile coverage. In addition, please be advised that the net result of this outage did trigger the requirement that T-Mobile file an Outage Report pursuant to Part 4 of the Federal Communication Commission's Rules.

T-Mobile attended the January 16, 2007 informal conference and was relieved to hear that Windstream would be developing a notification procedure through its wholesale group to advise carrier customers of significant outages like the one which occurred in September. However, Windstream's initial follow up letter to the Commission significantly narrowed the scope of the notification proposal which had been described informally to the Commission's staff. Windstream is now proposing that it provide notice only to customers who purchase collocation in an affected central office. Significantly, that would mean that if the exact outage were to recur, T-Mobile would receive no notification at all. T-Mobile does not purchase collocation service from Windstream; however, it is T-Mobile's request that Windstream contact

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major wholesale customers during such significant "newsworthy" events so that those carriers can provide their customers reliable information related to their service.

T-Mobile believes it should be considered a valued customer of Windstream and at a minimum entitled to outage information communicated directly by Windstream technical personnel to T-Mobile local operations personnel. T-Mobile is not asking Windstream for anything more than what was offered at the informal conference.

In its most recent letter Windstream claims T-Mobile is attempting to expand an obligation to include "practically any long distance carrier in the U.S." To the contrary, T-Mobile is not asking Windstream to be prepared to notify every carrier in the country. Rather, T-Mobile believes it would be both feasible and reasonable to notify more than just collocated customers.

Windstream also states that wireless providers do not provide equivalent notice in the event of a wireless network outage. Windstream's letter misses the point. T-Mobile and other wireless carriers rely on Windstream special access services to link their cell sites with Mobile Switching Centers. There is no corresponding arrangement by which Windstream depends on T-Mobile for a connection between Windstream facilities.

Windstream's own billing records identify its customers for special access into any specific Windstream office, and if Windstream intends a meaningful notification process it should include carriers, like T-Mobile, which use a dedicated facility from Windstream in order to originate traffic from their own customers. T-Mobile respectfully disagrees with the approach provided in the correspondence submitted by Windstream; and requests that the Commission consider such notification by Windstream as requested herein. Providing such notification to T-Mobile will allow T-Mobile to communicate this information to its valued customers during such events and will assist T-Mobile in providing award winning customer service.

Very truly yours,

STOLL KEENON OGDEN PLLC

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

Douglas F. Brent

Cc: Service List