

Via E-Mail and United States Mail

February 16, 2007

Mark R. Overstreet
(502) 209-1219
(502) 223-4387 FAX
moverstreet@stites.com

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

Drop Box
RECEIVED

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PUBLIC SERVICE
COMMISSION

Re: Case No. 2006-00532

Dear Ms. O'Donnell,

On February 9, 2007, Powertel/Memphis, Inc. and T-Mobile Central LLC ("T-Mobile") filed a letter in this proceeding asserting that Windstream's notice policy should be expanded to include T-Mobile and all other carriers who may lease facilities from Windstream. Windstream would like to respond to several aspects of the letter to clarify why T-Mobile's request is not reasonable or practical.

As an initial matter, T-Mobile's assertions that Windstream notified parties at the January 16, 2007 informal conference that Windstream was developing a procedure that would include notice to all carriers and that Windstream technical personnel would communicate outage information directly to T-Mobile local operations personnel are incorrect. Certainly, that is not what I heard and, after conferring with Mr. Logsdon, not what he said. To the contrary, Windstream offered to provide the details regarding its voluntary notification policy that it had developed internally to be used in the case of major outages such as Elizabethtown. Windstream subsequently provided those details explaining its policy to notify collocated carriers of major outages in its central offices.

T-Mobile asserts that Windstream's policy is inadequate and would result in T-Mobile (which does not own equipment/facilities collocated in Windstream's central office) receiving "no notification at all." This is incorrect. As explained below, T-Mobile would receive notice of major outages through alarms in its cell sites but not directly from Windstream. Attempts to shift all notification obligations to Windstream are unnecessary. T-Mobile states that in the instance involving the Elizabethtown office, 16 of its cell towers became non-functional. When cell sites become non-functional, internal alarms are triggered thereby immediately notifying the applicable wireless provider that a problem exists. Therefore, T-Mobile should have been and likely was notified very quickly of the Elizabethtown outage as a result of internal alarms being

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triggered in all of its 16 cell sites. T-Mobile then would have determined that its cell sites subtend the Elizabethtown central office and have contacted Windstream's repair center to inquire about any network outage Windstream was experiencing. In fact, on September 23 at 09:36 a trouble report was called in to Windstream for a Powertel circuit. The fact that this trouble report was made supports the fact that the existing cell site alarm notification is satisfactory and that carriers such as T-Mobile do receive notices of such major outages.

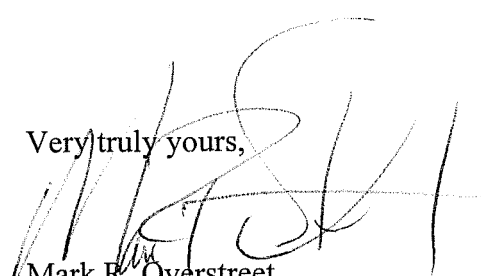
T-Mobile suggests incorrectly that it is feasible for Windstream to notify all wholesale customers and that T-Mobile's suggestion would not result in an obligation on Windstream to notify practically any long distance carrier in the United States. Yet, T-Mobile offers no factual support for its statements. Under T-Mobile's suggested approach, Windstream would assume responsibility for contacting all potentially impacted providers who may be attempting to terminate a call to a Windstream customer in Elizabethtown during a network outage. For the reasons set forth in Windstream's prior communications, such a practice would not be feasible or reasonable. Very simply, Windstream cannot notify or even identify every wireless, long distance, ILEC, or CLEC that could possibly attempt to terminate calls to Windstream customers during a major outage. Similarly, it is unfair to suggest as T-Mobile does that Windstream could notify only one subset of that group (i.e., wireless providers). T-Mobile also asserts that Windstream merely could use billing records to identify all of these carriers. This is simply illogical. Billing records do not contain readily available company emergency contact information, are not always immediately accessible during network outages, and would not pinpoint those providers who could be attempting to terminate calls to a particular central office.

Finally, T-Mobile suggests, again without any evidence in support of its statements, that wireless providers do not provide the type of notice it is asking Windstream to provide for the reason that Windstream does not "depend on T-Mobile for a connection between Windstream facilities." This statement misses the point. T-Mobile requests Windstream to provide notice of major outages to every potentially affected provider whose customers may not be able to complete calls to Windstream customers. It is illogical for T-Mobile to suggest that wireless network outages could never impact landline end users attempting to complete calls to wireless subscribers. Nevertheless, T-Mobile requests that Windstream provide the very notice that T-Mobile admits it does not provide in the case of such outages.

Windstream appreciates the opportunity to respond to T-Mobile's prior communication and believes that the cell site alarm system discussed above is sufficient to address T-Mobile's notification concerns. Windstream continues to believe that its notice policy is both reasonable and practical and effectively targets those collocated providers with immediate needs to respond for purposes of equipment repair in the event of major network outages.

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Very truly yours,



Mark R. Overstreet

cc: Douglas F. Brent
Dennis G. Howard, II

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