

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RECEIVED

Brandenburg Telephone Company; Duo County)
Telephone Cooperative Corporation, Inc.; Highland)
Telephone Cooperative, Inc., Mountain Rural)
Telephone Cooperative Corporation, Inc.; North)
Central Telephone Cooperative Corporation; South)
Central Rural Telephone Cooperative Corporation, Inc.)
And West Kentucky Rural Telephone Cooperative)
Corporation, Inc.)
)
)
Complainants) Case No. 2007-00004
v.)
)
Windstream Kentucky East, Inc.)
)
)
Defendant)

MAY 21 2009
PUBLIC SERVICE
COMMISSION

WINDSTREAM KENTUCKY EAST, LLC'S RESPONSES TO INTERVENORS'
SECOND REQUEST FOR INFORMATION

Windstream Kentucky East, LLC ("Windstream East") submits the following Responses to the Second Request for Information propounded by NuVox Communications, Inc., T-Mobile USA, Inc., Powertel/Memphis, Inc., T-Mobile Central LLC, and tw telecom of ky llc, (collectively, "Intervenors").

As a general matter, Intervenors' instructions stated, "When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations." Windstream East objects to this instruction to the extent it refers to entities operating in states outside Kentucky and this Commission's jurisdiction. Windstream East further objects that questions related to the TELRIC model ultimately are irrelevant and not dispositive of any outcome in this proceeding as applicable transit rates are not required by law to be set pursuant to TELRIC pricing.

Windstream East notes generally that, as is not an uncommon occurrence with cost study support, one question seeks information that is extraordinarily voluminous, not readily produced in any manageable format, and in some instances, embedded in and cannot be extracted from Windstream corporate systems. While Windstream East has indicated its appropriate objection on the applicable response, Windstream East also notes that the Intervenors may review such information at Windstream East's corporate headquarters during normal business hours and upon reasonable advance notice to Windstream East.

5. Please provide all supporting documents for the investment inputs to the cost study including but not limited to tandem switch, transport termination, and transport facility investments. Please include all documents related to any and all costs included in the investment inputs as well as any accounting documentation relating to those costs and any documents discussing or characterizing the nature of those costs including but not limited to whether they are accounting investments, embedded costs, forward-looking costs, etc.

Response: This request seeks Windstream East's production of files which are extraordinarily voluminous, not readily producible in any manageable format, and unduly burdensome. For example, one file alone is approximately more than 3,000 pages. Windstream East makes available the files for review by Intervenors during normal business hours at Windstream East's corporate headquarters and upon reasonable advance notice to Windstream East.

Windstream East Representative Supporting Response: Kerry Smith

6. Please identify (by CLLI) each Windstream switch at which tandem transit service is available under the transit tariff.

Response: Windstream East objects that this information is publicly available to Intervenors from the Local Exchange Routing Guide ("LERG"). Without waiving this objection, Windstream East states that its tandem switches are as follows, and tandem transit service is available to carriers subtending these tandems:

TANDEM OFFICE	CLLI Code
Ashland	ASLDKYXA03T
Elizabethtown	EZTWKYXA05T
Lexington	LXTNKYXA01T
Morehead	MRHDKYXA02T
Somerset	SMRTKYXA02T

Windstream East Representative Supporting Response: Kerry Smith

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7. Please identify (by CLLI) any Windstream switch providing tandem transit service that has been placed in service since 2003.

Response: Please see Response to No. 6 above.

Windstream East Representative Supporting Response: Kerry Smith

8. Regarding the cost study calculation in Tab "Rate Sheet," Row 21 labeled "End Office Switching Less 25% NTS," please admit or deny that Windstream's tariffed per minute rates for transit service include non-traffic sensitive costs.

Response: [REDACTED]

Windstream East Representative Supporting Response: Kerry Smith

9. With respect to the same cost study calculation, please explain:

- a) the logic supporting this calculation, including the assumed percentage of 25%;
- b) whether that percentage captures all or only a portion of non-traffic sensitive end office switching cost; and
- c) whether "Transit Cost" (Rows 16 through 21 contains any non-traffic sensitive costs.

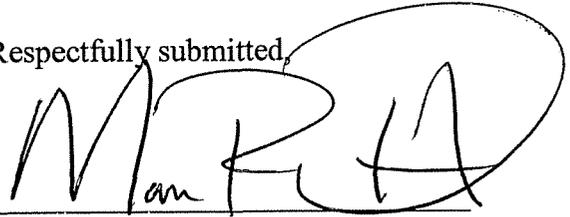
Response:

- a) [REDACTED]
- b) [REDACTED]
- c) [REDACTED]

Windstream East Representative Supporting Response: Kerry Smith

This 19th day of May, 2009.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet". The signature is written in a cursive style with large, sweeping letters. The "M" and "R" are particularly prominent, and the "O" is a large, open loop. The signature is written over a horizontal line.

Mark R. Overstreet, Esq.
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COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 19th day of May, 2009 upon:

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