

# STOLL·KEENON·OGDEN

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January 4, 2008

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Ms. Elizabeth O'Donnell Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40602 JAN 0 4 2008 PUBLIC SERVICE COMMISSION

RE: Case No. 2007-00162

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of Verizon's Request for Information in the above reference case. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via our runner.

Very truly yours,

STOLL KEENON OGDEN PLLC

W. En STET

W. Duncan Crosby III

**Enclosures** 

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### COMMONWEALTH OF KENTUCKY

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#### BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF NORTH CENTRAL	)	
TELEPHONE COOPERATIVE CORPORATION	)	CASE NO.
TO ADJUST RATES AND CHARGES FOR	)	2007-00162
BASIC LOCAL EXCHANGE SERVICE	Ì	

## **VERIZON'S REQUEST FOR INFORMATION**

MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Services & Systems Company d/b/a Telecom\*USA and Verizon Select Services, Inc. (collectively, "Verizon"), propounds the following requests for information to North Central Telephone Cooperative Corporation ("NCTC").

#### **INSTRUCTIONS**

Each response shall be answered under oath or be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Applicant shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which the Applicant fails or refuses to furnish all or part of the requested information, Applicant shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Provide the date on which NCTC completed implementation of intraLATA toll dialing parity in Kentucky.
- 2. Provide the total Kentucky-specific expenditures for implementing intraLATA dialing parity in NCTC's Kentucky exchanges, including, but not limited to, amounts for specific switch software, hardware and signaling system upgrades, and customer education costs specifically to implement dialing parity.
- 3. Provide the date on which NCTC began assessing any access rate element associated with the Non-Traffic Sensitive Revenue Requirement ("NTSRR").
- 4. For the years 2002 and 2006, provide the total intrastate switched access revenues recorded by NCTC.
- 5. For the year 2006, provide the total Kentucky intrastate terminating switched access minutes of use billed by NCTC, and the total amounts billed for those minutes.
- 6. For the year 2006, provide the total revenue associated with NCTC's NTSRR-based rate elements.
- 7. For the year 2006, provide average rate per access minute billed using NCTC's NTSRR-based rate elements.
- 8. Provide the date on which NCTC began providing interLATA toll service in Kentucky either directly or through any affiliate.
- 9. Provide the date on which NCTC began providing intraLATA toll service in Kentucky either directly or through any affiliate.
- 10. Provide an itemization of all amounts recorded by NCTC in 2006 as Kentucky-specific depreciation expense.
- Provide a copy of the most recent white pages directory distributed in Kentucky by NCTC.

Respectfully submitted,

C. Kent Hatfield

Douglas F. Brent

W. Duncan Crosby III

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Dulaney L. O'Roark III

Vice President and General Counsel -

Southeast Region Verizon

5055 North Point Parkway

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Counsel for MCI Communications Services, Inc., Bell Atlantic Communications, Inc., NYNEX Long Distance Company, TTI National, Inc., Teleconnect Long Distance Services & Systems Company and Verizon Select Services, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion for Full Intervention has been served by hand on those persons whose names appear below this 4<sup>th</sup> day of January, 2008.

John E. Selent Holly C. Wallace Edward T. Depp Dinsmore & Shohl LLP 1400 PNC Plaza 500 W. Jefferson Street Louisville, KY 40202

W. Duncan Crosby III