

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

MCI COMMUNICATIONS SERVICES, INC., BELL)
ATLANTIC COMMUNICATIONS, CIN., NYNEX LONG)
DISTANCE COMPANY, TTI NATIONAL, INC.,)
TELECONNECT LONG DISTANCE SERVICES &)
SYSTEMS COMPANY AND VERIZON SELECT)
SERVICES, INC.)

Complainants

) CASE 2007-00503

v.

WINDSTREAM KENTUCKY WEST, INC.,)
WINDSTREAM KENTUCKY EAST, INC. – LEXINGTON)
AND WINDSTREAM KENTUCKY EAST, INC. – LONDON)

Defendants

WINDSTREAM KENTUCKY EAST, LLC AND WINDSTREAM KENTUCKY WEST, LLC'S RESERVATION OF RIGHTS AS ALTERNATIVELY REGULATED CARRIERS AND REQUESTS FOR ADMISSION AND SECOND DATA REQUESTS TO 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.

Windstream Kentucky East, LLC ("Windstream East") and Windstream Kentucky West, LLC submit that they are alternatively regulated local exchange carriers who are statutorily exempt from this proceeding. Without waiving and upon express reservation of all of their rights as alternatively regulated carriers, Windstream East and Windstream West submit the following Requests for Admission and Second Data Requests to 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") to be answered in accord with the same Definitions and General Instructions set forth in their initial Data Requests to Verizon.

REQUESTS FOR ADMISSION

1. Please admit that the Federal Communications Commission's ("FCC") recently announced National Broadband Plan submitted to Congress includes comprehensive intercarrier compensation reform, including proposed reductions to intrastate switched access rates.
2. Please admit that the FCC's National Broadband Plan includes a transition period and recovery for revenue reductions.

SECOND DATA REQUESTS

1. Please explain in detail your prior involvement (including any support of) and anticipated future involvement in the FCC's National Broadband Plan submitted to Congress, particularly as the FCC's plan relates to intercarrier compensation reform.
2. With respect to the originating access minutes of use ("MOUs") that Windstream requested you to provide in response to Windstream's initial Data Request No. 10 and which are subject to Windstream's request regarding responses to be compelled, please provide the corresponding amounts that you paid each Kentucky local exchange carrier for each year from 2006 to the present. In the case where you did not remit the compensation to the carrier, please provide the amounts you were billed, invoiced, or otherwise charged by the carrier.
3. With respect to the terminating access minutes of use ("MOUs") that Windstream requested you to provide in response to Windstream's initial Data Request No. 11 and which are subject to Windstream's request regarding responses to be compelled, please provide the corresponding amounts that you paid each Kentucky local exchange carrier for each year from 2006 to the present. In the case where you did not remit the compensation to the carrier, please provide the amounts you were billed, invoiced, or otherwise charged by the carrier.

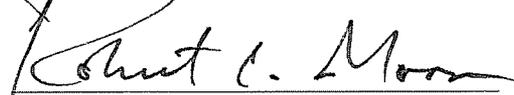
4. With respect to the originating access minutes of use ("MOUs") that Windstream requested you to provide in response to Windstream's initial Data Request No. 10 and which are subject to Windstream's request regarding responses to be compelled, please answer the following. With respect to the total originating access minutes of use ("MOUs") for all local exchange carriers that you were requested to provide in response to Windstream's initial Data Request No. 10, please provide the percentage of those total minutes (by year from 2006 to the present) that represents the amount of traffic that you have carried for end user customers that have picked you as their long distance provider and the percentage of those total minutes (by year from 2006 to the present) representing the amount of traffic that you have transported as an underlying carrier on behalf of another carrier.

5. With respect to the terminating access minutes of use ("MOUs") that Windstream requested you to provide in response to Windstream's initial Data Request No. 11 and which are subject to Windstream's request regarding responses to be compelled, please answer the following. With respect to the total terminating access minutes of use ("MOUs") for all local exchange carriers that you were requested to provide in response to Windstream's initial Data Request No. 11, please provide the percentage of those total minutes (by year from 2006 to the present) that represents the amount of traffic that you have carried for end user customers that have picked you as their long distance provider and the percentage of those total minutes (by year from 2006 to the present) representing the amount of traffic that you have transported as an underlying carrier on behalf of another carrier.

6. With respect to the yearly percentages of traffic that you have transported as an underlying carrier on behalf of another carrier requested in No. 5 above, please provide the

percentage of that traffic that represents the traffic you transported on behalf of all wireless carriers, including your own wireless affiliate.

Respectfully submitted,



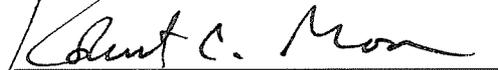
Robert C. Moore
HAZELRIGG & COX, LLP
415 West Main Street, 1st Floor
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Frankfort, Kentucky 40602-0676
(502) 227-2271

And

Kimberly K. Bennett
Windstream Communications
4001 Rodney Parham Road
Little Rock, AR 72212-2442

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon Douglas F. Brent and C. Kent Hatfield, Stoll, Keenon Ogden, PLLC, 2000 PNC Plaza, 500 West Jefferson Street, Louisville, Kentucky 40202, Dulaney L. O' Roark III, Vice President and General Counsel - Southern Region, Verizon, 5055 North Point Parkway, Alpharetta, Georgia 30022, John N. Hughes, 124 West Todd Street, Frankfort, Kentucky, 40601 and Mary K. Keyer, General Counsel/AT & T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky, 40203, by placing same in the U.S. Mail, postage pre-paid, this the 2nd day of April, 2010.



Robert C. Moore