



Mary K. Keyer
General Attorney
Kentucky Legal Department

AT&T Kentucky
601 W. Chestnut Street
Room 407
Louisville, KY 40203

T 502-582-8219
F 502-582-1573
mary.keyer@att.com

July 12, 2012

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PUBLIC SERVICE
COMMISSION

VIA OVERNIGHT MAIL

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: BellSouth Telecommunications, LLC, d/b/a AT&T
Kentucky, Complainant v. Halo Wireless, Inc., Defendant
PSC 2011-00283

Dear Mr. Derouen:

Enclosed for filing are the original and ten (10) copies of AT&T Kentucky's Supplemental Responses to Interrogatory No. 8 and Requests for Admissions Nos. 11 and 12 propounded by Halo Wireless in its First Set of Data Requests. These responses are made pursuant to AT&T Kentucky's agreement in its Supplemental Authority in Support of AT&T Kentucky's Memorandum in Opposition to Halo's Motion to Compel, thereby making moot Halo's motion to compel responses to these discovery requests.

Please let me know if you have any questions.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

INTERROGATORY: Define "end point" as used by AT&T and provide the source of the definition.

ANSWER: AT&T Kentucky has not used the term "end point" in this proceeding and does not routinely use the term so as to be able to answer the question as framed. In this proceeding, however, AT&T Kentucky witness Mark Neinast used the term "end-point" (with the hyphen) twice in his pre-filed direct testimony. First, at page 12, lines 19-22, Mr. Neinast stated, "The intercarrier compensation rate that applies to a call is determined by its originating and terminating end-points, which, as I explained above, normally can be determined by comparing the originating and terminating NPA-NXX." By "originating and terminating end-points," Mr. Neinast meant the physical point at which the calling party originated the call and the physical point at which the call is terminated to the called party. That meaning is based upon Mr. Neinast's long experience in the industry, and not upon any source to which AT&T Kentucky can cite. Mr. Neinast then testified, at page 14, lines 8-10 of his pre-filed direct testimony, "We could also determine, based on the end-points of the call and type of call, which intercarrier compensation rate should have applied (*i.e.*, reciprocal compensation or access charges.)" In that sentence, Mr. Neinast intended "end-points" to convey the same meaning as in his previous usage of that term.

REQUEST: AT&T contends its affiliate that provides voice over Internet Protocol (VoIP) service in association with U-Verse is not a telecommunications carrier.

RESPONSE: Denied. AT&T Kentucky has not contended and does not contend that its affiliate that provides VoIP service in association with U-Verse is not a telecommunications carrier. AT&T Kentucky itself provides VoIP service in association with U-Verse and does not contend and, to the best of AT&T Kentucky's knowledge, information and belief, has not contended that it is not a telecommunications carrier

REQUEST: AT&T contends its affiliate that provides VoIP service in association with U-Verse is an Enhanced Information Service Provider, as defined by the FCC.

RESPONSE: Denied. AT&T Kentucky has not contended and does not contend that its affiliate that provides VoIP service in association with U-Verse is an Enhanced Information Service Provider, as defined by the FCC. AT&T Kentucky itself provides VoIP service in association with U-Verse and does not contend and, to the best of AT&T Kentucky's knowledge, information and belief, has not contended that it is or is not an Enhanced Information Service Provider, as defined by the FCC.


CERTIFICATE OF SERVICE – PSC 2011-00283

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof via U.S. Mail, this 12th day of July 2012.

Russell Wiseman
President & CEO
Halo Wireless, Inc.
2351 West Northwest Hwy., Suite 1204
Dallas, TX 75220

Jennifer M. Larson
McGuire, Craddock & Strother, P.C.
2501 N. Harwood, Suite 1800
Dallas, TX 75201

Katherine W. Ross, Esq.
Regard Law Group, PLLC
269 W. Main Street, Suite 600
Lexington, KY 40507-1759


Mary K. Keyer