

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
FEB 14 2018
PUBLIC SERVICE
COMMISSION

In the Matter of:

PETITION OF AT&T KENTUCKY FOR ORDER)
CONFIRMING RELINQUISHMENT OF)
ELIGIBLE TELECOMMUNICATIONS CARRIER) CASE NO. 2017-00416
DESIGNATION IN SPECIFIED AREAS)
)

REQUESTS FOR INFORMATION

Pursuant to the Procedural Schedule contained in Appendix A to the Commission's February 2, 2018 Order ("*Order*"), Airvoice Wireless, American Broadband and Telecommunications Company, Boomerang Wireless, i-wireless LLC, Ready Wireless, SI Wireless, LLC, and Telrite Corporation, through counsel, (collectively, "Wireless ETCs") hereby submits their Data Requests to AT&T. In accordance with the *Order*, responses should be provided no later than February 28, 2018.

DEFINITIONS

"AT&T" or "you" refers to the Petitioner subject to this proceeding.

"Identify" means to describe in detail the information requested. For example, "identify," when used in reference to a person or other entity, shall mean to state the full name and present or last known address for such person or entity, as well as the position or line of business for such person or entity. "Identify," when used in reference to an action, event, or occurrence, including a communication, meeting, or statement, shall mean to describe the action, event or occurrence by reference to, for example, its nature, subject matter, location and date and to state the participants in and witnesses to the action, event, or occurrence. "Identify," when used in reference to a document, shall mean to state the date, author, signers and recipients of the

document and to describe the type of document (e.g., letter, memorandum, e-mail) and its custodian.

“Relate” or “relating” means containing, governing, showing, mentioning, referring, discussing or pertaining in any way, directly or indirectly, to the subject matter.

INSTRUCTIONS

1. Unless otherwise indicated by the Request, responses shall include separate information for each of your relevant entities.

2. For each response, please repeat the discovery request and submit a complete response together with any and all documentation requested.

3. These Requests for Information are continuing in nature so as to require you to continually update your responses and promptly provide additional documents or information responsive to these requests when further information and documents are discovered or become known, directly or indirectly, to you, your agents, or attorneys. Should you not understand any particular request, please contact the intervenors' attorney in this proceeding.

4. Please identify the name and telephone number of each person responsible for the content of each response, and the date upon which the response was prepared.

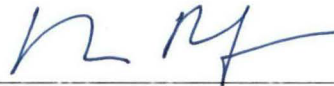
5. If any of the following data requests cannot be answered in full, please answer or produce to the extent possible, specifying the reason for your inability to answer the remainder or to produce in full, and state whatever information or knowledge you have concerning the unanswered portion.

6. Terms used herein shall be construed to include their plural, and *vice versa*, so as to make the interrogatory or request for production inclusive rather than exclusive. Thus, the connectives “and,” “or,” and “and/or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed

outside of its scope. Similarly, “each” as used herein includes the word “every” and *vice versa*, and “including” shall mean “including without limitation.”

Dated: February 14, 2018

Respectfully submitted,



Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
douglas.brent@skofirm.com

*Counsel for Airvoice Wireless, American
Broadband and Telecommunications Company,
Boomerang Wireless, i-wireless LLC, Ready
Wireless, SI Wireless, LLC, and Telrite
Corporation,*

DATA REQUESTS

1. Please identify any wireline Eligible Telecommunications Carrier you contend is providing Lifeline services in the entire “relinquishment area” defined by the Petition.
2. Does AT&T contend that wireless telecommunications service can meet the needs of Lifeline eligible consumers in the “relinquishment area?”
3. After AT&T Kentucky's Petition is granted, will AT&T Mobility continue to offer Lifeline service in the “relinquishment area?”