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February 21, 2018

**HAND DELIVERED**

Gwen R. Pinson  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

Mark R. Overstreet  
(502) 209-1219  
(502) 223-4387 FAX  
moverstreet@stites.com

**RECEIVED**

**FEB 21 2018**

**PUBLIC SERVICE  
COMMISSION**

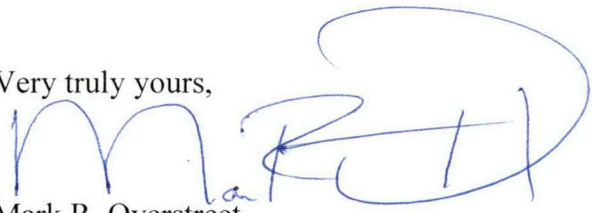
RE: **Case No. 2017-00416**

Dear Ms. Pinson:

Enclosed please find and accept for filing the original and ten copies of BellSouth Telecommunications, LLC d/b/a AT&T Kentucky's responses to the Wireless ETCs February 14, 2018 requests for information.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

  
Mark R. Overstreet

MRO

cc: Douglas F. Brent

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FEB 21 2018

PUBLIC SERVICE  
COMMISSION

BEFORE THE  
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

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

Responses of BellSouth Telecommunications, LLC D/B/A AT&T Kentucky  
To The Wireless ETCs February 14, 2018 First Request For Information

1. Please identify any wireline Eligible Telecommunications Carrier you contend is providing Lifeline services in the entire "relinquishment area" defined by the Petition.

Response:

Federal law does not distinguish between "wireline" and "wireless" ETCs for purposes of relinquishing ETC status. As addressed in AT&T's Petition, at pp. 10-12, the standard for relinquishment is whether the area being relinquished is "served by more than one eligible telecommunications carrier." 47 U.S.C. 214(e)(4). There are no limitations on what types of carriers constitute alternative ETCs. That said, based on information and belief, AT&T Kentucky states that most if not all of the alternative ETCs listed at Exhibit C to its October 20, 2017 Petition are wireless ETCs.

Witness: Amy L. Scarborough

2. Does AT&T contend that wireless telecommunications service can meet the needs of Lifeline eligible consumers in the "relinquishment area?"

Response:

Yes. Because AT&T Kentucky's Lifeline subscribership declined by 91% between 2008 and June 2017, because as of June, 2017 approximately 99% of Kentucky Lifeline subscribers were being served by an ETC other than AT&T Kentucky, and because most of those ETCs are wireless carriers, (Pet. at 6-7, 13), AT&T submits that wireless carriers can and are meeting the needs of Lifeline eligible customers in the relinquishment area.

Witness: Amy L. Scarborough

3. After AT&T Kentucky's Petition is granted, will AT&T Mobility continue to offer Lifeline service in the "relinquishment area?"

Response:

AT&T Kentucky's Petition has no effect on, nor does it rely on, the ETC status of AT&T Mobility. See footnote 21 to AT&T Kentucky's Petition.

Witness: Amy L. Scarborough

Verification Of Amy L. Scarborough

Amy L. Scarborough, first being duly sworn, states and deposes that the foregoing responses are true, accurate, complete based on her knowledge, information, and belief formed after a reasonable inquiry.

2/21/18




Amy L. Scarborough

STATE OF Kentucky )

) SS

COUNTY OF Franklin )

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Amy L. Scarborough this the 21<sup>st</sup> day of February, 2018.



Notary Public  
April 7, 2019 Expiration Date

LINDA A. SMITH  
NOTARY PUBLIC  
STATE AT LARGE, KENTUCKY  
COMM. #530698  
MY COMMISSION EXPIRES APRIL 7, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served via United States Postal Service, First Class Mail, postage prepaid, upon:

Douglas F. Brent  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828

this the 21<sup>st</sup> day of February, 2018.

A handwritten signature in blue ink, appearing to read 'MRO' with a large flourish above the 'O'. Below the signature, the name 'Mark R. Overstreet' is printed.

Mark R. Overstreet