

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
Case No. 2018-00157

SEP 17 2018

PUBLIC SERVICE
COMMISSION

In the Matter of

CMN-RUS, INC.

COMPLAINANT

v.

WINDSTREAM KENTUCKY EAST, INC.

DEFENDANT

**WINDSTREAM KENTUCKY EAST, INC.'S
SECOND REQUESTS FOR INFORMATION TO CMN-RUS, INC.**

Comes the Defendant, Windstream Kentucky East, Inc. ("Windstream"), by counsel, and for its Second Requests for Information to CMN-RUS, Inc. ("CMN"), to be answered in accordance with the Order entered by the Public Service Commission on August 7, 2018, states as follows:

REQUESTS

1. Please describe, by reference to statute, regulation, or other law, CMN's "regulatory" reasons requiring CMN to build out its network in Fayette County as quickly as feasible as described by John Greenback in his Direct Testimony, page 3, line 10.

2. Please produce any documentation evidencing that during the negotiations that are described on pages 5-9 of the Direct Testimony of John Greenbank, CMN made any proposals to Windstream for attachment to more than 300 poles in a rolling 30 day period but less than 1500 poles in a rolling 30 day period. If no such documentation exists, but such a proposal was made orally, please describe the proposal made, who at CMN made the proposal, and to whom at Windstream the proposal was addressed.

3. Please provide documentation showing that CMN is "prepared to take on the additional obligations that the KIH agreement would have required" as described at lines 12-18 on

page 7 of John Green Bank's Direct Testimony. If no such documentation exists, please describe how CMN knows that it is "prepared to take on the additional obligations that the KIH agreement would have required" as described in Mr. Greenbank's testimony.

4. Please provide any and all contracts between Metronet Technologies, LLC and firms who currently are or will in the future attach CMN's equipment to poles for the LFUC project.

MAZANEC, RASKIN & RYDER CO., LPA



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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was served on September 17, 2018 via electronic mail upon the following:

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