

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ASSOCIATES IN DERMATOLOGY, PLLC	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2019-00047
	)	
BELLSOUTH TELECOMMUNICATIONS, LLC	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO BELLSOUTH TELECOMMUNICATIONS, LLC DBA AT&T KENTUCKY

Bellsouth Telecommunications, LLC dba AT&T Kentucky (AT&T Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on or before February 3, 2020, pursuant to the Commission's December 19, 2019 Order. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

AT&T Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, AT&T Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to AT&T Kentucky's response to the requests for information attached as Appendix A to the December 3, 2019 Order (Requests to AT&T Kentucky), Items 3 and 7.

- a. State whether the analog telephone service that AT&T Kentucky indicated that it provided to Associates in Dermatology, PLLC (Associates in Dermatology) in 2018 was provided at the 3810 Springhurst Boulevard address in Louisville, Kentucky, and if not, provide the address at which the service was provided.

- b. Identify the telephone numbers for the analog telephone service provided by AT&T Kentucky to Associates in Dermatology in 2018.

c. Provide any bills or other written communications indicating amounts owed sent by AT&T Kentucky or any affiliate of AT&T Kentucky to Associates in Dermatology from 2018 to the present for any analog telephone service (redact the telephone numbers from which Associates in Dermatology received any calls or to which it made any calls in any call log).

d. State whether AT&T Kentucky provided analog telephone service to Associates in Dermatology at any time from 2013 to the present other than during the period identified in response to Item 7, and if so, identify when that service was provided and identify the location at which the service was provided.

2. State whether the bills provided by Associates in Dermatology as Appendix 4, or "AID – 4," to its response to the requests for information attached as Appendix B to the December 3, 2019 Order (Requests to Associates in Dermatology) are for service provided in Kentucky or in Indiana, and explain whether and, if so, how you are able to determine the location at which the service is provided based on the bills.

3. a. State whether AT&T Kentucky contends that Associates in Dermatology currently owes any amount for or related to services provided by AT&T Kentucky or any affiliate of AT&T Kentucky to Associates in Dermatology, and if so, identify the service for which those amounts are owed and the month and year in which they were incurred.

b. Provide any bills or other written communications indicating amounts owed sent by AT&T Kentucky or any affiliate of AT&T Kentucky to Associates in Dermatology for amounts AT&T Kentucky contends are still owed (redact the telephone numbers from which Associates in Dermatology received any calls or to which it made

any calls in any call log). If the bills were provided in response to Item 1(c) above, please simply identify the bills or other written communications that would be responsive to this request.

4. Refer to AT&T Kentucky's response to Requests to AT&T Kentucky, Items 12 and 15.

a. Identify and describe the function of the "Customer Premise Equipment (CPE) provided by AT&T Kentucky as its Flexible Reach service," and state whether Associates in Dermatology was charged a specific rate or amount to rent, lease, or otherwise use the equipment distinct from the amounts it was charged for the Flexible Reach service.

b. Explain whether Associates in Dermatology was required by AT&T Kentucky to obtain the "Customer Premise Equipment" from AT&T Kentucky.

c. Explain whether the "Customer Premise Equipment" is located between the telephones from which Associates in Dermatology would make voice calls and Associates in Dermatology's PBX or between the PBX and AT&T Kentucky's network.

d. Identify the format of any voice calls when they entered the "Customer Premise Equipment" from Associates in Dermatology's telephones and the format of any voice calls when they left the "Customer Premise Equipment" toward AT&T Kentucky's network for the service provided between August 2016 and February 2018.

5. Refer to AT&T Kentucky's response to Requests to AT&T Kentucky, Item 15(a) in which AT&T Kentucky indicated that "[t]he point of demarcation lies at Associates in Dermatology's premises at its PBX" when AT&T Kentucky was providing analog service. State whether AT&T Kentucky contends that the point of demarcation was at Associates in Dermatology's PBX between its PBX and AT&T Kentucky's network or at Associates in Dermatology's PBX between its PBX and the telephones from which Associates in Dermatology would make voice calls. Provide a diagram depicting the network connections.

6. Provide any additional evidence, if any, that AT&T Kentucky believes is necessary to support its contention that the Commission lacks jurisdiction over this matter.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED JAN 21 2020

cc: Parties of Record

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