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March 11, 2005

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PUBLIC SERVICE  
COMMISSION

Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

Case 2005-00107

RE: Petition by Kentucky ALLTEL, Inc. Regarding Service Standards

Dear Ms. O'Donnell:

Enclosed please find a Petition filed on behalf of Kentucky ALLTEL, Inc. in the above-referenced case. An original and eleven (11) copies are enclosed. Please file-stamp the extra copy and return it to me in the self-addressed, pre-stamped envelope I have enclosed for your convenience.

Thank you for your cooperation in this matter. Please do not hesitate to contact me with any questions you may have.

Sincerely,

WYATT, TARRANT & COMBS, LLP

Noelle M. Holladay

Enclosure

cc: Kimberly K. Bennett  
30344334.0

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION BY	)	
KENTUCKY ALLTEL, INC.	)	Case No. <u>2005-00107</u>
REGARDING SERVICE STANDARDS	)	

PETITION REGARDING SERVICE STANDARDS

Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") petitions the Kentucky Public Service Commission ("Commission") as follows:

1. Kentucky ALLTEL is an incumbent local exchange company ("ILEC") providing telecommunications service within the Commonwealth.
2. On February 13, 2002, the Commission approved Kentucky ALLTEL's acquisition of the regulated Kentucky assets of Verizon South, Inc. ("Verizon") and required Kentucky ALLTEL to adopt the service standards imposed on Verizon as a result of the merger between GTE Corporation and Bell Atlantic Corporation ("Verizon service standards").
3. The Verizon service standards measure the same activity set forth in 807 KAR 5:061 ("generic telephone utility service standards") but apply more stringent standards with respect to those measurements than are imposed generally on all other ILECs pursuant to 807 KAR 5:061.
4. Kentucky ALLTEL is the only telecommunications carrier in the Commonwealth subject to the higher Verizon service standards.
5. At the time of the Kentucky ALLTEL-Verizon acquisition in 2002, the Commission imposed the higher Verizon service standards on Kentucky

ALLTEL apparently due to the Commission's concern for service quality, in part due to a service quality proceeding subsequent to an acquisition involving an ALLTEL affiliate operating in Nebraska.

6. After more than two and one half (2 1/2) years of operations subsequent to the Kentucky ALLTEL-Verizon acquisition, Kentucky ALLTEL has not experienced or displayed any conversion-related service issues as anticipated by the Commission.
7. Out of the eight service standards imposed by the Commission, Kentucky ALLTEL has met or exceeded six of the higher Verizon service standards for the last thirty months and the remaining two standards for fourteen months. Kentucky ALLTEL has consistently met or exceeded each of the generic telephone utility service standards for twenty-one of the thirty months preceding the filing of this Petition. During that time period Kentucky ALLTEL was the subject of a labor strike and numerous weather related disasters.
8. Other market participants, including cable, wireless and VoIP providers (such as Insight Cable and Vonage), are not subject to any service standards, not even the Commission's generic telephone utility service standards to which other ILECs are subject. In contrast, Kentucky ALLTEL is subject to arbitrarily higher and onerous standards above and beyond those imposed on other ILECs. Holding Kentucky ALLTEL to the most onerous standards is not only inequitable but places Kentucky ALLTEL at a competitive disadvantage.
9. While competition would justify the elimination of all such requirements, at the very least, Kentucky ALLTEL should be subject only to the generic telephone

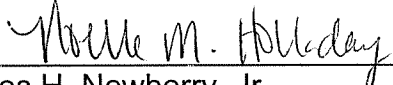
utility service standards generally applied to all ILECs operating under 807 KAR 5:061.

WHEREFORE, Kentucky ALLTEL respectfully requests that the Commission grant this Petition; issue a finding that Kentucky ALLTEL shall be subject to the same standards imposed by the Commission on other ILECs, as those standards may hereinafter be amended or repealed; and grant all other relief to which Kentucky ALLTEL may be entitled.

Dated: March 11, 2005.

Respectfully submitted,

**Kentucky ALLTEL, Inc.**

By:   
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