

KENTUCKY ALLTEL

2004 PSC OBJECTIVE REPORT
807 KAR 5:061

Regular Service Installation

Commission Objective - 90% Within 5 Days

Case No. 99-296 Objectives: Central=94.2 East=95.8 West=97.3

SECTION 10 (1)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	94.2	97.2	98.0	98.4	98.2	95.5	98.4	95.5	94.2	95.6	97.4	92.0
East Dist	94.7	96.3	96.9	95.9	96.5	87.3	91.7	96.3	95.8	96.5	96.5	94.4
West Dist	93.6	97.2	97.5	96.1	95.2	89.9	93.9	97.3	97.5	98.2	98.3	95.8
Total Co.	94.2	96.9	97.5	96.9	96.8	91.2	94.8	96.2	95.6	96.6	97.4	94.0

Trouble Clearing - 24 Hours

Commission Objective - 85%

Case No. 99-296 Objectives: Central=89.9 East=89.6 West=93.1

SECTION 25 (3)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	87.0	90.1	95.1	94.7	90.2	85.6	88.1	90.8	90.7	91.9	93.2	90.4
East Dist	92.6	92.9	95.3	95.7	83.0	87.9	89.4	89.6	88.1	91.6	92.9	90.3
West Dist	94.8	96.2	97.1	98.0	95.5	93.7	92.9	94.6	94.4	96.8	96.2	94.8
Total Co.	91.0	92.6	95.6	95.9	88.4	88.6	90.3	91.2	89.9	93.1	93.9	91.3

Answering Time - Toll - Operator Assistance

Objective - Average Speed of Answer - 8 Seconds

SECTION 22 (1)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	6.3	6.3	5.9	6.1	5.9	5.7	5.4	5.9	5.0	6.7	6.9	6.8
East Dist												
West Dist												
Total Co.												

Answering Time - Repair

Objective - Average Speed of Answer - 20 Seconds

SECTION 22 (2)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist												
East Dist												
West Dist												
Total Co.												

Trouble Reports Per 100 Lines

Commission Objective - 8 or Less Per 100 Lines

Case No. 99-296 Objectives: Central=1.7 East=2.5 West=1.9

SECTION 25 (4)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	0.9	1.1	1.0	1.0	1.1	1.1	1.1	1.3	1.1	0.9	0.9	0.8
East Dist	2.3	2.5	2.3	2.1	2.5	3.6	2.6	2.5	2.5	2.2	1.9	1.8
West Dist	1.9	1.8	1.8	1.8	1.9	2.8	3.3	2.6	2.0	1.8	1.7	1.8
Total Co.	1.5	1.6	2.7	1.5	1.6	2.4	2.0	1.9	1.7	2.6	1.4	2.4

KENTUCKY ALLTEL

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Local Dialing
Objective - 5% or Less ATB

SECTION 15 (2)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	0	0	0	0	0	0	0	0	0	0	0	0
East Dist	0	0	0	0	0	0	0	0	0	0	0	0
West Dist	0	0	0	0	0	0	0	0	0	0	0	0
Total Co.	0	0	0	0	0	0	0	0	0	0	0	0

Dial Tone
Objective - 95% Within 3 Seconds

SECTION 15 (1)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	99.9	99.9	99.9	99.9	99.9	99.9	99.9	99.9	99.9	99.9	99.9	99.9
East Dist	99.8	99.9	99.9	99.9	99.9	99.9	99.8	99.6	99.6	99.3	99.9	99.9
West Dist	99.9	99.9	99.9	99.9	99.9	99.8	99.1	99.6	99.9	99.9	99.9	99.9
Total Co.	99.9	99.9	99.9	99.9	99.9	99.7	99.7	99.7	99.8	99.7	99.9	99.9

Toll Connecting
Objective - 3% or Less ATB

SECTION 15 (3)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	0.1	0.0	0.0	0.0	1.2	1.2	0.3	0.1	0.0	0.0	0.0	0.0
East Dist	0.3	0.0	0.0	0.0	0.1	0.0	0.0	0.4	0.2	0.0	0.0	1.2
West Dist	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.1	0.0	0.2	0.0
Total Co.	0.2	0.0	0.0	0.0	0.4	0.4	0.1	0.3	0.1	0.0	0.1	0.4

KENTUCKY ALLTEL - EXCHANGES BY DISTRICT

CENTRAL	EAST	WEST
Berea	Ashland	Albany
Bryantsville	Augusta	Arlington
Hustonville	Barbourville	Bardwell
Irvine	Brodhead	Bee Spring
Lancaster	Brooksville	Bradfordsville
Lexington	Catlettsburg	Brownsville
Liberty	Cumberland	Burkesville
Midway	Dover	Burnside
Nicholasville	E Bernstadt	Calvert City
Versailles	Evarts	Campbellsville
Wilmore	Ewing	Caneyville
	Fernleaf	Cecilia
	Flat Lick	Clarkson
	Flemingsburg	Columbia
	Garrison	Columbus
	Germantown	Elizabethtown
	Grayson	Eubank
	Greensburg	Faubush
	Greenup	Glasgow
	Hazard	Hodgenville
	Hillsboro	Lebanon
	Jenkins	Leitchfield
	Johnsville	Loretto
	Leatherwood	Mamothcave
	Lewisburg	Milburn
	Livingston	Monticello
	London	Nancy
	Manchester	Park City
	Mays Lick	Science Hill
	Meads	Scottsville
	Morehead	Shopville
	Mt. Olivet	Smithland
	Mt. Vernon	Smiths Grove
	Olive Hill	Somerset
	Oneida	South Hardin
	Owingsville	Tompkinsville
	Paint Lick	Uniontown
	Russell	White Lily
	Salt Lick	
	Sharpsburg	
	Southshore	
	Tollesboro	
	Vanceburg	
	Vicco	
	Washington	

PERCENT OUT OF SERVICE TROUBLES CLEARED IN 24 HRS

KY Central PSC Obj:	89.9	Jan04	Feb04	Mar04	Apr04	May04	Jun04	Jul04	Aug04	Sep04	Oct04	Nov04	Dec04
PSC DAC 3100	90.45	91.83	96.04	93.87	90.10	83.16 *	82.76 *	88.28 *	91.35 *	91.16	91.93	89.88 *	
PSC DAC 3103	89.48	88.76 *	93.52	94.14	89.98	88.35 *	92.12	92.89	90.57	91.77	94.62	91.18	
PSC DAC 3104	71.74	88.44 *	96.49	98.01	90.08	83.88 *	91.06	91.17	89.62 *	93.79	92.18	89.29 *	
PSC DAC 3105	91.43	98.15	97.37	100.00	100.00	85.50 *	91.67	90.28	92.94	92.31	97.30	93.10	
KY Central District	86.96 *	90.12	95.11	94.74	90.24	85.56 *	88.06 *	90.79	90.70	91.91	93.17	90.36	
KY Eastern PSC Obj:	89.6	Jan04	Feb04	Mar04	Apr04	May04	Jun04	Jul04	Aug04	Sep04	Oct04	Nov04	Dec04
PSC DAC 3200	90.52	88.76 *	90.48	92.62	72.73 *	82.03 *	86.18 *	82.67 *	80.86 *	87.44 *	88.48 *	85.78 *	
PSC DAC 3300	98.09	98.09	99.13	98.76	98.38	94.60	93.28	96.78	96.29	93.83	96.93	93.05	
PSC DAC 3400	91.25	94.24	98.20	97.97	88.42 *	89.46 *	89.20 *	93.71	93.64	95.54	95.92	96.79	
PSC DAC 3500	95.21	99.53	99.45	99.49	100.00	93.36	98.58	97.23	98.56	98.35	97.33	95.24	
KY Eastern District	92.63	92.93	95.29	95.67	82.96 *	87.94 *	89.41 *	89.59 *	88.06 *	91.64	92.92	90.26	
KY Western PSC Obj:	93.1	Jan04	Feb04	Mar04	Apr04	May04	Jun04	Jul04	Aug04	Sep04	Oct04	Nov04	Dec04
PSC DAC 3600	98.43	98.48	99.27	98.96	98.523	97.77	97.57	95.775	97.58	97.34	98.5	96.22	
PSC DAC 3700	93.75	95.44	91.8 *	95.13	90.857 *	89.66 *	90.15 *	94.464	91.32 *	93.93	96.02	88.32 *	
PSC DAC 3800	92.66 *	92.62 *	96.4	97.61	91.597 *	91.32 *	95.21	92.936 *	92.51 *	96.87	97.02	94.59	
PSC DAC 3900	91.33 *	96.86	97.94	99.28	97.354	93.52	90.12 *	95.8	95.51	98.22	97.61	95.22	
PSC DAC 3901	97.45	95.65	99.02	97.86	94.218	94.44	86.26 *	93.713	94.15	95.74	90.42 *	96	
KY Western District	94.75	96.23	97.06	98.04	95.45	93.73	92.86 *	94.638	94.41	96.75	96.19	94.8	
Total State Of KY	91.30	92.58	95.66	95.89	88.4	88.6	90.28	91.162	89.86	93.09	93.86	91.29	

TROUBLES PER 100 ACCESS LINES

	Jan04	Feb04	Mar04	Apr04	May04	Jun04	Jul04	Aug04	Sep04	Oct04	Nov04	Dec04
1.7												
PSC DAC 3100	0.51	0.64	0.57	0.56	0.63	0.87	0.70	0.72	0.57	0.47	0.55	0.49
PSC DAC 3103	1.43	1.57	1.40	1.53	1.62	2.31 *	1.65	1.92	* 1.54	1.26	1.33	1.15
PSC DAC 3104	2.94	* 2.92	* 2.78	* 2.54	* 2.90	* 3.86	* 3.38	* 3.74	* 3.80	* 2.78	* 2.72	* 2.21 *
PSC DAC 3105	1.59	1.63	1.65	1.65	1.77	* 2.62	* 1.59	1.80	* 2.02	* 1.48	1.28	0.88
KY Central PSC Obj:	0.93	1.05	0.95	0.97	1.07	1.48	1.15	1.26	1.06	0.85	0.91	0.78
2.5												
PSC DAC 3200	2.66	* 2.75	* 2.23	2.30	2.91	* 3.76	* 2.98	* 2.93	* 3.17	* 2.85	* 2.36	2.38
PSC DAC 3300	1.73	1.91	1.75	1.59	1.76	3.03	1.96	1.92	1.89	1.58	1.44	1.38
PSC DAC 3400	2.56	* 3.09	* 3.28	* 2.51	* 2.87	* 4.16	* 3.14	* 2.69	* 2.58	* 2.28	2.09	1.85
PSC DAC 3500	2.56	* 2.70	* 1.97	2.19	2.15	3.30	* 2.72	* 2.72	* 2.46	1.97	1.74	1.21
	2.33	2.54	* 2.26	2.10	2.46	3.56	* 2.64	* 2.52	* 2.55	* 2.22	1.93	1.82
KY Eastern PSC Obj:	2.66	* 2.75	* 2.23	2.30	2.91	* 3.76	* 2.98	* 2.93	* 3.17	* 2.85	* 2.36	2.38
1.9												
PSC DAC 3600	1.46	1.60	1.39	1.37	1.66	2.12	* 2.42	* 2.19	* 1.34	1.51	1.26	1.46
PSC DAC 3700	1.73	1.89	2.17	* 2.19	1.60	2.05	* 3.36	* 2.28	* 2.02	* 1.54	1.34	1.51
PSC DAC 3800	1.96	* 1.51	1.55	1.67	1.65	3.12	* 4.04	* 2.73	* 1.97	* 1.80	1.88	1.62
PSC DAC 3900	2.34	* 2.35	* 2.25	* 2.13	* 2.54	* 3.67	* 3.60	* 3.13	* 2.61	* 2.08	* 1.98	* 2.10 *
PSC DAC 3901	2.23	* 1.99	* 2.05	* 2.10	* 2.03	* 3.29	* 3.23	* 3.01	* 2.34	* 2.20	* 2.29	* 2.42 *
	1.89	1.83	1.81	1.81	1.87	2.79	* 3.27	* 2.61	* 1.96	* 1.78	1.68	1.75
KY Western PSC Obj:	1.89	1.83	1.81	1.81	1.87	2.79	* 3.27	* 2.61	* 1.96	* 1.78	1.68	1.75
Total State Of KY	1.50	1.61	1.48	1.45	1.60	2.38	2.01	1.90	1.65	2.63	1.35	2.38

PERCENT REGULAR SERVICE INSTALLATIONS IN 5 DAYS

	94.2	Jan04	Feb04	Mar04	Apr04	May04	Jun04	Jul04	Aug04	Sep04	Oct04	Nov04	Dec04
KY Central PSC Obj:													
PSC DAC 3100		97.12	97.54	98.41	99.23	99.05	95.18	99.05	94.69	92.83 *	95.48	97.25	87.71 *
PSC DAC 3103		97.30	97.98	98.48	98.44	98.84	98.27	98.87	96.54	95.13	95.68	97.84	93.70 *
PSC DAC 3104		77.32 *	94.46	96.00	96.15	94.38	87.90 *	95.60	94.10 *	96.00	97.11	96.27	95.75
PSC DAC 3105		97.56	96.39	95.29	96.84	96.92	97.06	96.08	96.43	91.75 *	91.55 *	98.96	97.62
KY Central District		94.24	97.22	97.96	98.35	98.25	95.51	98.42	95.48	94.19 *	95.64	97.40	92.04 *
KY Eastern PSC Obj:													
95.8													
PSC DAC 3200		95.21 *	93.92 *	95.09 *	93.93 *	94.20 *	83.80 *	92.17 *	94.31 *	93.89 *	96.18	97.09	90.87 *
PSC DAC 3300		94.38 *	98.13	97.57	97.45	98.15	89.24 *	90.85 *	97.75 *	95.81	94.80 *	94.92 *	93.30 *
PSC DAC 3400		96.62	94.89 *	98.31	94.76 *	94.93 *	85.37 *	91.69 *	95.76 *	97.32 *	98.90	98.55	99.05
PSC DAC 3500		90.59 *	98.54	96.36	98.15	100.00	96.05	93.38 *	98.81	97.47	98.67	97.01	98.73
KY Eastern District		94.70 *	96.25	96.90	95.87	96.55	87.31 *	91.66 *	96.30	95.75 *	96.45	96.50	94.45 *
KY Western PSC Obj:													
97.3													
PSC DAC 3600		96.88 *	99.50	99.69	99.55	97.95	97.57	97.22 *	96.21 *	98.97 *	99.05	99.44	98.38
PSC DAC 3700		90.76 *	97.02 *	97.86	96.92 *	94.85 *	87.80 *	85.93 *	98.17	97.07 *	96.55 *	99.65	94.62 *
PSC DAC 3800		94.15 *	96.67 *	95.91 *	95.45 *	92.61 *	80.49 *	91.07 *	95.75 *	96.01 *	98.51	97.68	93.16 *
PSC DAC 3900		90.24 *	95.95 *	97.21 *	96.70 *	96.21 *	94.22 *	99.28	99.35	98.42	99.21	98.11	96.51 *
PSC DAC 3901		95.24 *	96.37 *	97.01 *	89.93 *	94.47 *	90.73 *	95.24 *	97.38	96.89 *	97.03 *	96.26 *	96.47 *
KY Western District		93.59 *	97.21 *	97.50	96.12 *	95.15 *	89.94 *	93.89 *	97.26 *	97.52 *	98.21	98.34	95.80 *
Total State Of KY		94.22	96.90	97.47	96.87	96.81	91.18	94.81	96.25	95.63	96.58	97.37	93.96

ALLTEL COMMUNICATIONS
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Phyllis Masters
External Affairs

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RECEIVED

SEP 13 2004

PUBLIC SERVICE
COMMISSION

September 13, 2004

Mr. Kyle Willard
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: ALLTEL Kentucky and Kentucky ALLTEL Service Results
July 2004

Enclosed are both ALLTEL Kentucky's and Kentucky ALLTEL's service results for the month of July 2004.

As you are likely aware, Kentucky has experienced an uncharacteristic amount of storms this summer. The result of these storms has been an increase in the number of service affecting issues in the months of May, June and July. ALLTEL has been working extremely hard to maintain high service levels by working many hours of overtime and also working over the weekends during these months. We have also been assigning construction personnel to assist the service technicians in restoring service. We are confident that our service results will show improvement for August and the remainder of the year.

ALLTEL is committed to service quality and is working hard everyday to ensure that our customers are satisfied and that we meet the goals that the Commission has established. Should you wish to discuss these issues further please feel free to contact me.

Sincerely

Phyllis Masters

Phyllis Masters

2005 Service Results

- **January – All objectives met or exceeded.**
- **February – All objectives met or exceeded.**
- **March – All objectives met or exceeded.**
- **April – All objectives met or exceeded.**

KENTUCKY ALLTEL

2005 PSC OBJECTIVE REPORT
807 KAR 5:061

Regular Service Installation

Commission Objective - 90% Within 5 Days

Case No. 99-296 Objectives: Central=94.2 East=95.8 West=97.3
SECTION 10 (1)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	95.0	98.9	98.6	98.4								
East Dist	96.0	98.4	98.0	98.2								
West Dist	98.5	98.9	98.8	98.7								
Total Co.	96.3	98.7	98.4	98.4								

Trouble Clearing - 24 Hours
Commission Objective - 85%
Case No. 99-296 Objectives: Central=89.9 East=89.6 West=93.1
SECTION 25 (3)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	92.6	96.8	98.6	96.8								
East Dist	92.8	94.5	96.5	97.1								
West Dist	96.8	99.0	99.3	98.0								
Total Co.	93.8	96.4	98.0	97.3								

Answering Time - Toll - Operator Assistance
Objective - Average Speed of Answer - 8 Seconds

SECTION 22 (1)

	J	F	M	A	M	J	J	A	S	O	N	D
Total Co.	5.5	6.8	6.2	5.8								

Trouble Reports Per 100 Lines
Commission Objective - 8 or Less Per 100 Lines
Case No. 99-296 Objectives: Central=1.7 East=2.5 West=1.9
SECTION 25 (4)

	J	F	M	A	M	J	J	A	S	O	N	D
Central Dist	0.9	0.8	0.5	0.7								
East Dist	2.0	1.7	1.2	1.5								
West Dist	1.8	1.3	1.1	1.5								
Total Co.	1.4	1.1	0.8	1.1								

Answering Time - Repair
Objective - Average Speed of Answer - 20 Seconds

SECTION 22 (2)

	J	F	M	A	M	J	J	A	S	O	N	D
Total Co.	5.8	3.9	6.0	7.2								

KENTUCKY ALLTEL - EXCHANGES BY DISTRICT

CENTRAL	EAST	WEST
Berea	Ashland	Albany
Bryantsville	Augusta	Arlington
Hustonville	Barbourville	Bardwell
Irvine	Brodhead	Bee Spring
Lancaster	Brooksville	Bradfordsville
Lexington	Catlettsburg	Brownsville
Liberty	Cumberland	Burkesville
Midway	Dover	Burnside
Nicholasville	E Bernstadt	Calvert City
Versailles	Evarts	Campbellsville
Wilmore	Ewing	Caneyville
	Fernleaf	Cecilia
	Flat Lick	Clarkson
	Flemingsburg	Columbia
	Garrison	Columbus
	Germantown	Elizabethtown
	Grayson	Eubank
	Greensburg	Faubush
	Greenup	Glasgow
	Hazard	Hodgenville
	Hillsboro	Lebanon
	Jenkins	Leitchfield
	Johnsville	Loretto
	Leatherwood	Mamothcave
	Lewisburg	Milburn
	Livingston	Monticello
	London	Nancy
	Manchester	Park City
	Mays Lick	Science Hill
	Meads	Scottsville
	Morehead	Shopville
	Mt. Olivet	Smithland
	Mt. Vernon	Smiths Grove
	Olive Hill	Somerset
	Oneida	South Hardin
	Owingsville	Tompkinsville
	Paint Lick	Uniontown
	Russell	White Lily
	Salt Lick	
	Sharpsburg	
	Southshore	
	Tollesboro	
	Vanceburg	
	Vicco	
	Washington	



3A – Provide any empirical evidence to support each of Alltel’s assertions regarding its service standard performance. This information should be in a spreadsheet format and include all the raw data, any analysis and appropriate graphs and/or charts that clearly depict Alltel’s conclusions.

Response: The attached graphs provide a summary of Kentucky Alltel's actual achieved service quality performance compared to the Commission's standard objectives and the higher Verizon objectives. While Kentucky Alltel’s service quality numbers for 2003 suffered because of a catastrophic ice storm in February and a protracted labor issue that occurred between June and October, it has exhibited solid service quality performance prior to and after these occurrences.

In fact, since acquiring the Kentucky Verizon territories in August of 2002 Kentucky Alltel met or exceeded the standards for other ILECs in Kentucky 24 of the past 33 months. Kentucky Alltel met or exceeded the industry standard objective for “Regular Service Installation” and Trouble Clearing 24 Hours” for the prior 10 consecutive months. Further, Kentucky Alltel has met the industry service objective for “Trouble Clearing” the previous 19 months. Kentucky Alltel has met the industry service quality standard for “Trouble Reports per 100 lines” since it began operations in Kentucky in August of 2002.

An important indicator of Kentucky Alltel's service quality is the decreasing number of complaints received by the Commission. During the year 2003 the PSC received over 1,000 service complaints regarding Kentucky Alltel. Again, during that year Kentucky Alltel faced two critical challenges, a debilitating ice storm in February and a work stoppage, which began in June and ended in October 2003. In 2004, this number dropped dramatically to 401. So far for the year 2005 (January through May), Kentucky Alltel has received 110 total complaints from the Commission. That is an average of 22 complaints per month which puts Kentucky Alltel on track to again significantly reduce the number of complaints it received during the previous year.

The competitive nature of Kentucky’s telecommunications marketplace demands that all providers of communications – wireless, cable, CLECs, ISPs – make customer service paramount. The variety and scope of providers means that customers no longer will tolerate a company that ignores their issues or concerns. Like its competitors, Kentucky Alltel must devote its employee’s time and energy to meeting the ever-changing needs of its customers.

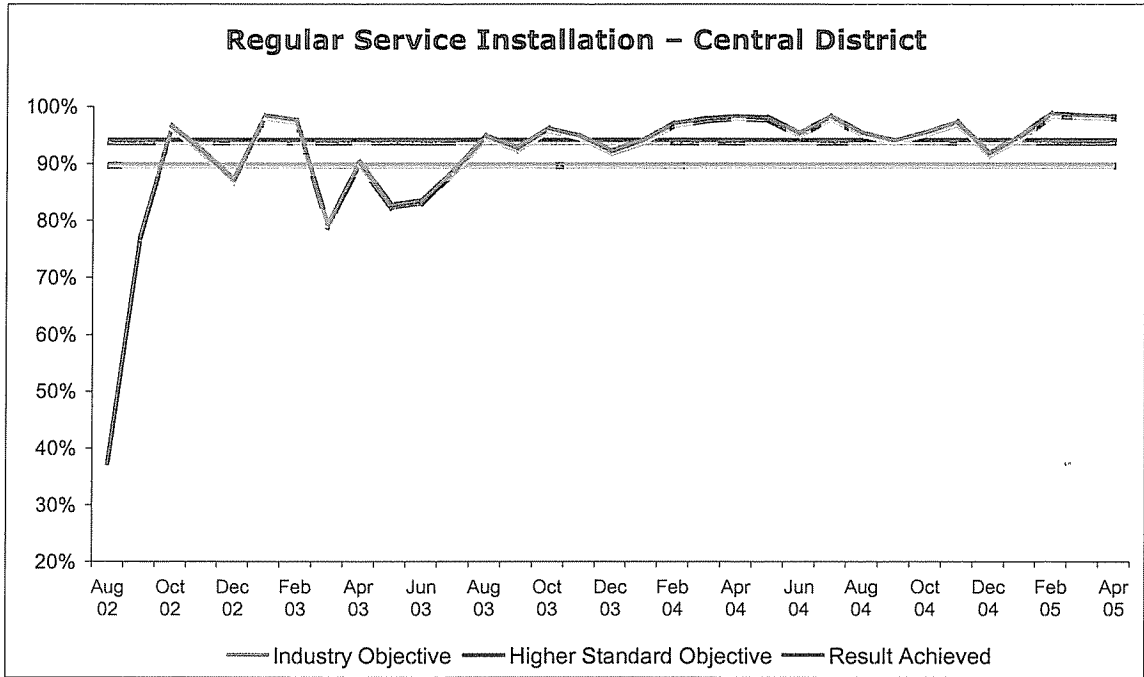


Chart 1

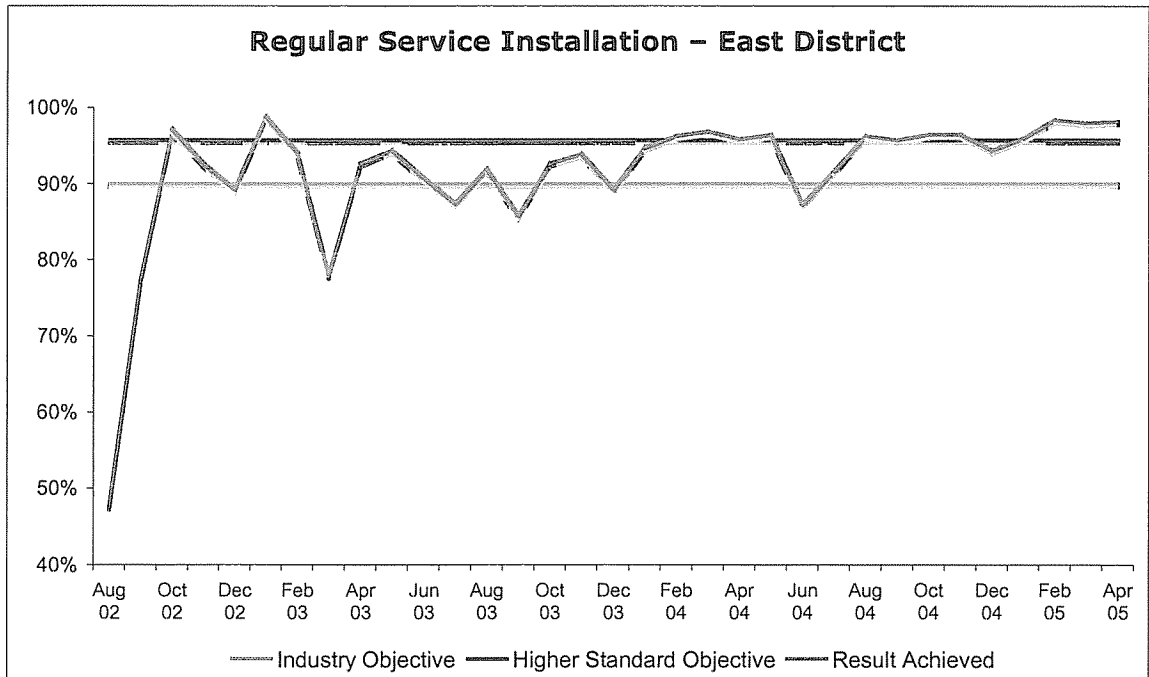


Chart 2

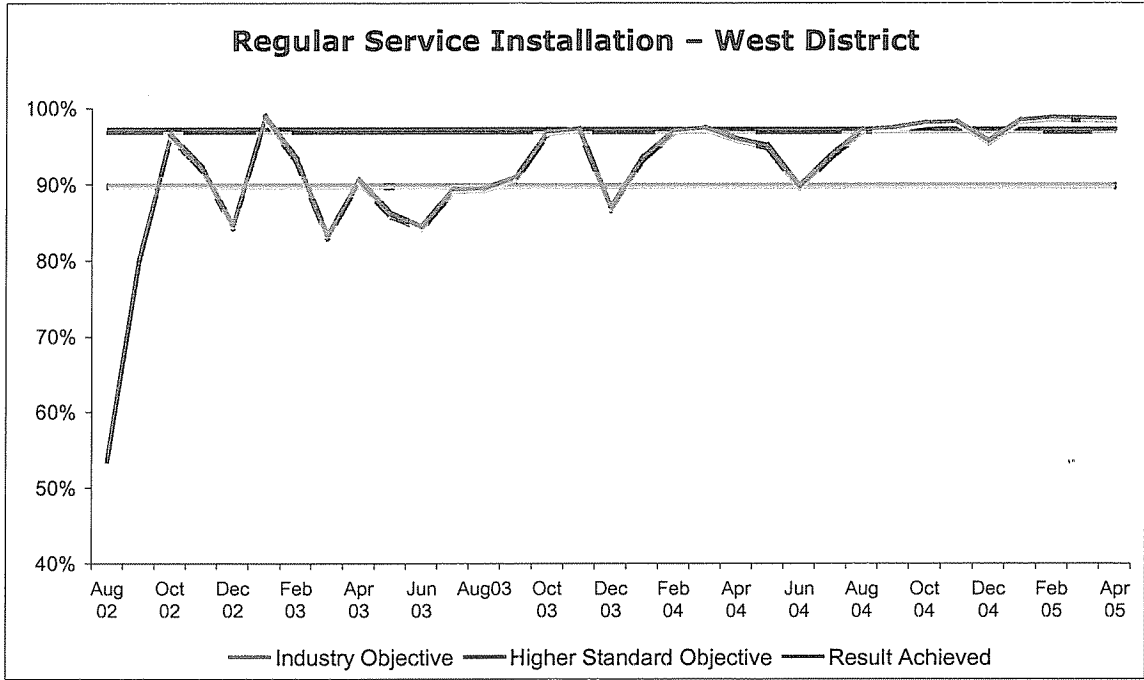


Chart 3

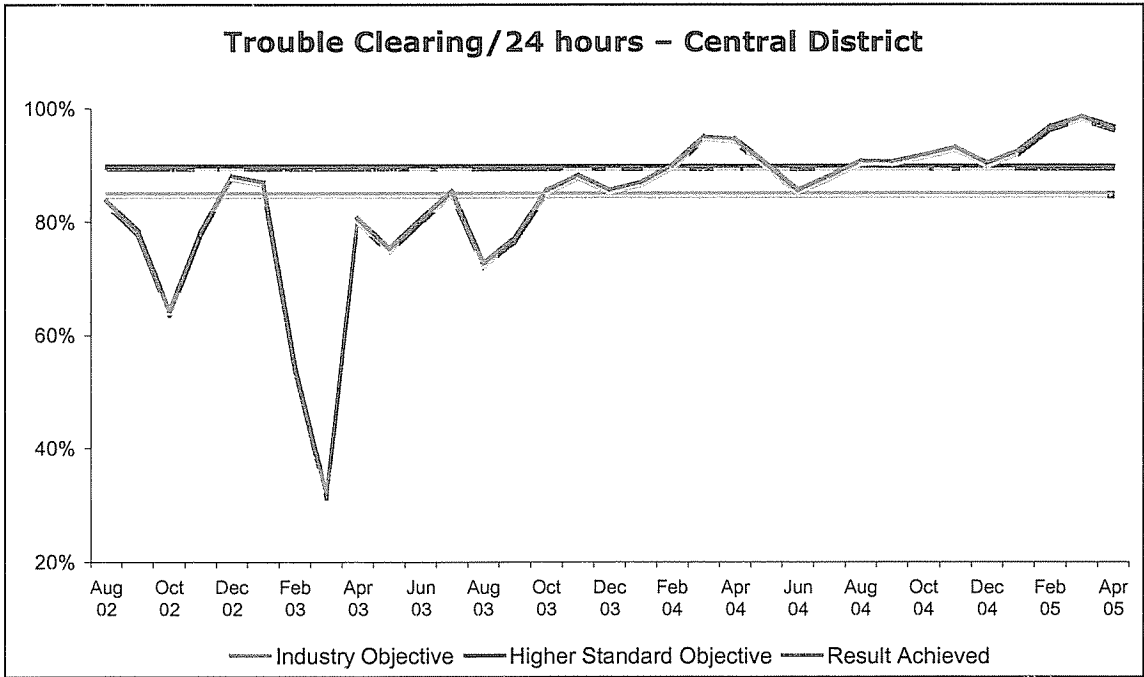


Chart 4

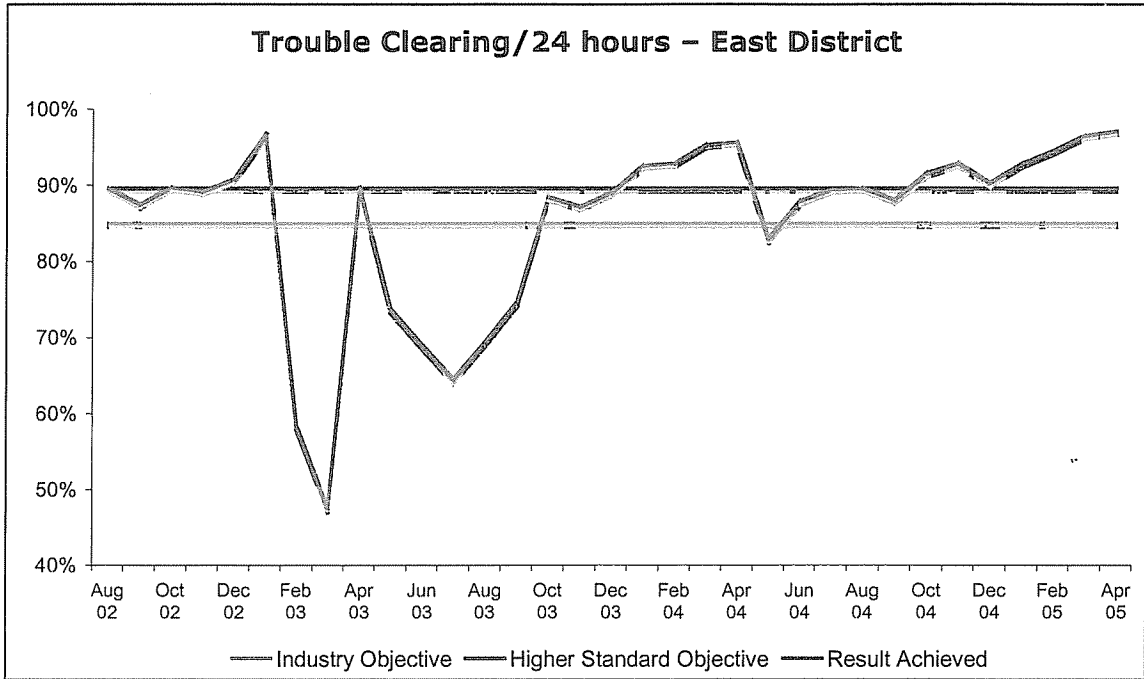


Chart 5

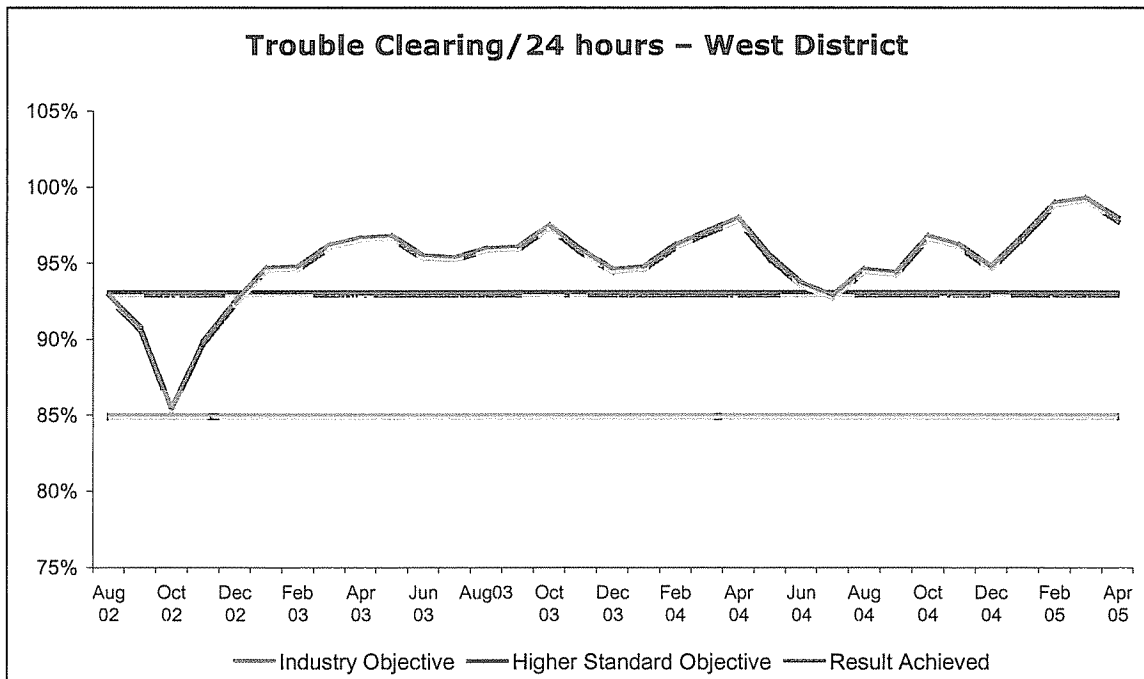


Chart 6

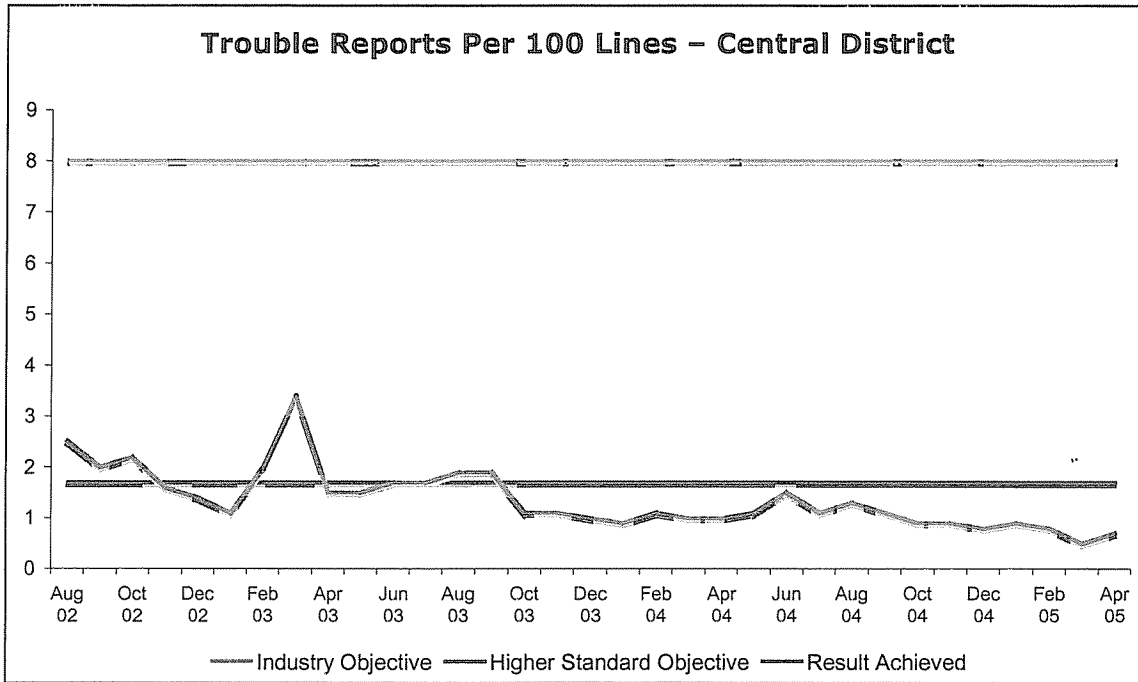


Chart 7

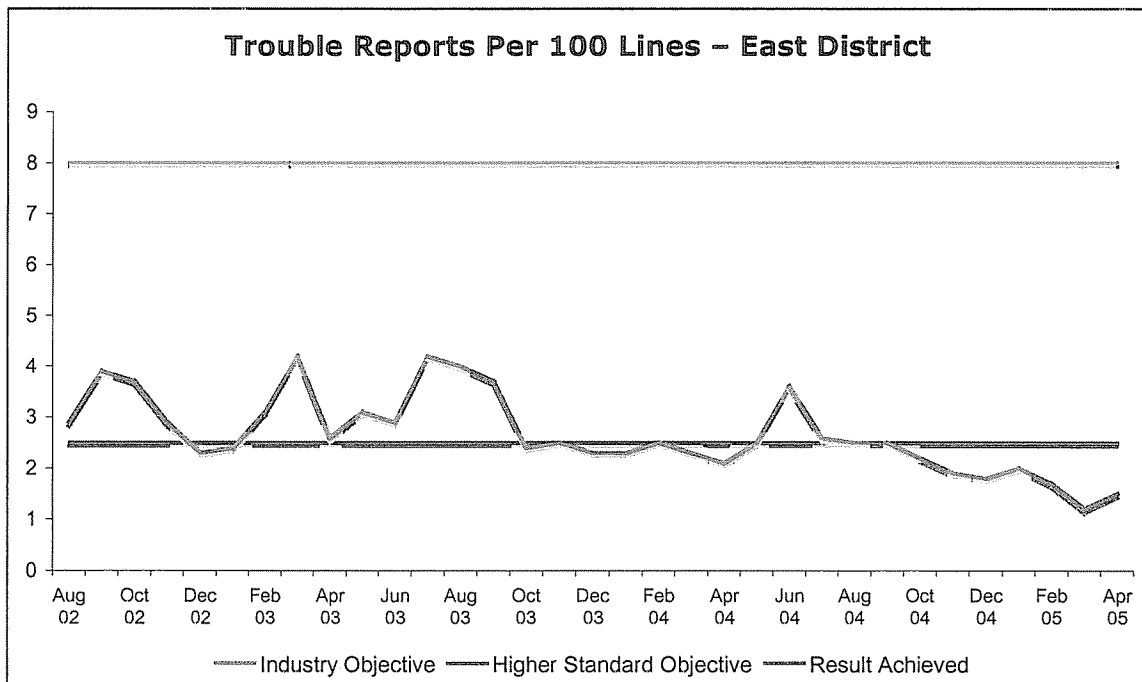


Chart 8

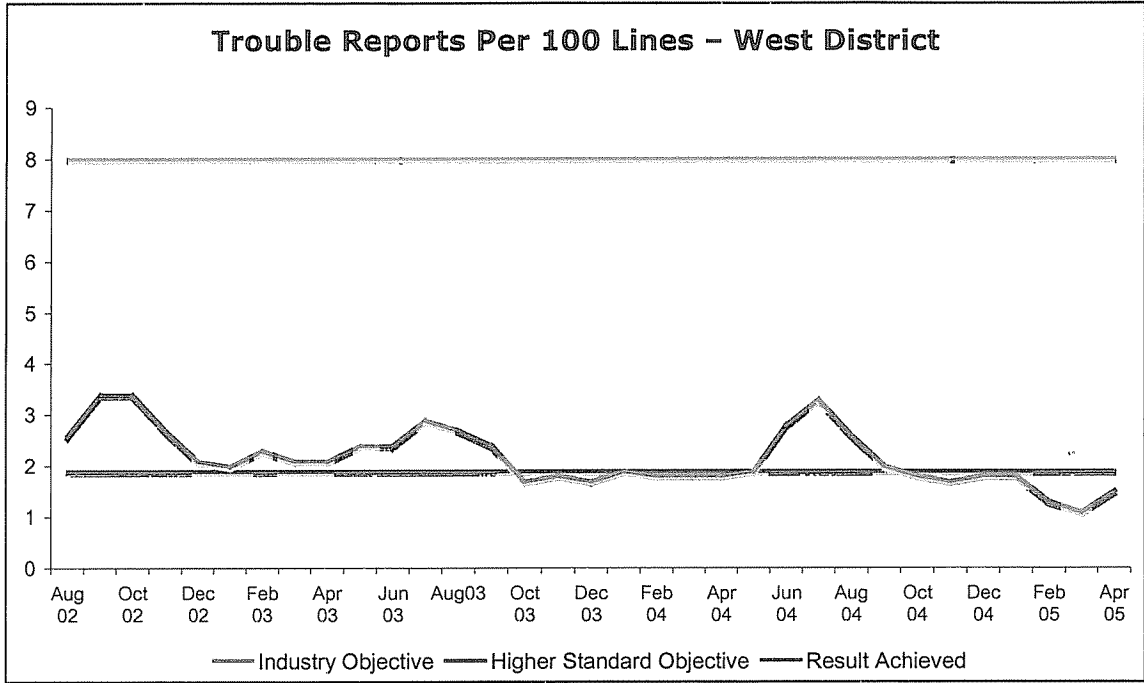
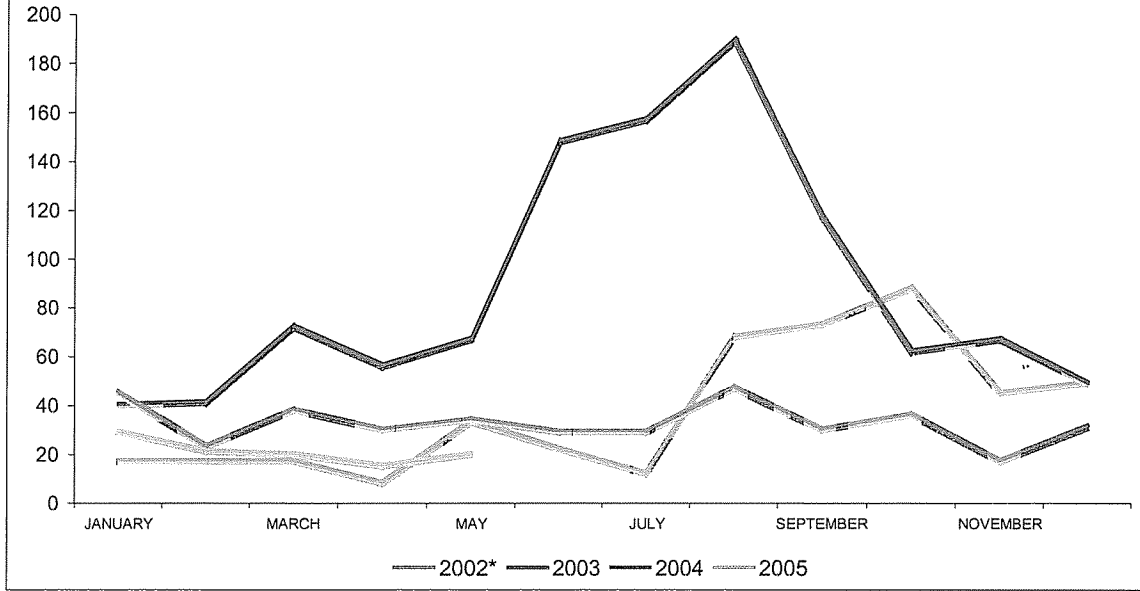


Chart 9

Kentucky Commission Complaints





Regular Service Installation - CENTRAL DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	90%	94.2%	38.0%	No	No
Sept 02	90%	94.2%	77.3%	No	No
Oct 02	90%	94.2%	96.7%	Yes	Yes
Nov 02	90%	94.2%	92.4%	Yes	No
Dec 02	90%	94.2%	87.3%	No	No
Jan 03	90%	94.2%	98.5%	Yes	Yes
Feb 03	90%	94.2%	97.7%	Yes	Yes
Mar 03	90%	94.2%	79.5%	No	No
Apr 03	90%	94.2%	90.4%	Yes	No
May 03	90%	94.2%	82.9%	No	No
Jun 03	90%	94.2%	83.7%	No	No
Jul 03	90%	94.2%	88.9%	No	No
Aug 03	90%	94.2%	95.0%	Yes	Yes
Sept 03	90%	94.2%	92.9%	Yes	No
Oct 03	90%	94.2%	96.3%	Yes	Yes
Nov 03	90%	94.2%	95.0%	Yes	Yes
Dec 03	90%	94.2%	92.4%	Yes	No
Jan 04	90%	94.2%	94.2%	Yes	Yes
Feb 04	90%	94.2%	97.2%	Yes	Yes
Mar 04	90%	94.2%	98.0%	Yes	Yes
Apr 04	90%	94.2%	98.4%	Yes	Yes
May 04	90%	94.2%	98.2%	Yes	Yes
Jun 04	90%	94.2%	95.5%	Yes	Yes
Jul 04	90%	94.2%	98.4%	Yes	Yes
Aug 04	90%	94.2%	95.5%	Yes	Yes
Sept 04	90%	94.2%	94.2%	Yes	Yes
Oct 04	90%	94.2%	95.6%	Yes	Yes
Nov 04	90%	94.2%	97.4%	Yes	Yes
Dec 04	90%	94.2%	92.0%	Yes	No
Jan 05	90%	94.2%	95.0%	Yes	Yes
Feb 05	90%	94.2%	98.9%	Yes	Yes
Mar 05	90%	94.2%	98.6%	Yes	Yes
Apr 05	90%	94.2%	98.4%	Yes	Yes
				7 No's	12 No's



Regular Service Installation - EAST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	90%	95.8%	47.7%	No	No
Sept 02	90%	95.8%	77.6%	No	No
Oct 02	90%	95.8%	97.1%	Yes	Yes
Nov 02	90%	95.8%	92.6%	Yes	No
Dec 02	90%	95.8%	89.3%	No	No
Jan 03	90%	95.8%	98.8%	Yes	Yes
Feb 03	90%	95.8%	94.1%	Yes	No
Mar 03	90%	95.8%	78.0%	No	No
Apr 03	90%	95.8%	92.7%	Yes	No
May 03	90%	95.8%	94.4%	Yes	No
Jun 03	90%	95.8%	90.8%	Yes	No
Jul 03	90%	95.8%	87.4%	No	No
Aug 03	90%	95.8%	91.9%	Yes	No
Sept 03	90%	95.8%	85.8%	No	No
Oct 03	90%	95.8%	92.7%	Yes	No
Nov 03	90%	95.8%	93.9%	Yes	No
Dec 03	90%	95.8%	89.3%	No	No
Jan 04	90%	95.8%	94.7%	Yes	No
Feb 04	90%	95.8%	96.3%	Yes	Yes
Mar 04	90%	95.8%	96.9%	Yes	Yes
Apr 04	90%	95.8%	95.9%	Yes	Yes
May 04	90%	95.8%	96.5%	Yes	Yes
Jun 04	90%	95.8%	87.3%	No	No
Jul 04	90%	95.8%	91.7%	Yes	No
Aug 04	90%	95.8%	96.3%	Yes	Yes
Sept 04	90%	95.8%	95.8%	Yes	Yes
Oct 04	90%	95.8%	96.5%	Yes	Yes
Nov 04	90%	95.8%	96.5%	Yes	Yes
Dec 04	90%	95.8%	94.4%	Yes	No
Jan 05	90%	95.8%	96.0%	Yes	Yes
Feb 05	90%	95.8%	98.4%	Yes	Yes
Mar 05	90%	95.8%	98.0%	Yes	Yes
Apr 05	90%	95.8%	98.2%	Yes	Yes
				8 No's	19 No's



Regular Service Installation - WEST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	90%	97.3%	54.1%	No	No
Sept 02	90%	97.3%	80.2%	No	No
Oct 02	90%	97.3%	96.6%	Yes	No
Nov 02	90%	97.3%	92.4%	Yes	No
Dec 02	90%	97.3%	84.7%	No	No
Jan 03	90%	97.3%	99.0%	Yes	Yes
Feb 03	90%	97.3%	93.5%	Yes	No
Mar 03	90%	97.3%	83.4%	No	No
Apr 03	90%	97.3%	90.7%	Yes	No
May 03	90%	97.3%	86.3%	No	No
Jun 03	90%	97.3%	84.6%	No	No
Jul 03	90%	97.3%	89.4%	No	No
Aug03	90%	97.3%	89.6%	No	No
Sept 03	90%	97.3%	91.1%	Yes	No
Oct 03	90%	97.3%	97.0%	Yes	No
Nov 03	90%	97.3%	97.4%	Yes	Yes
Dec 03	90%	97.3%	87.1%	No	No
Jan 04	90%	97.3%	93.6%	Yes	No
Feb 04	90%	97.3%	97.2%	Yes	No
Mar 04	90%	97.3%	97.5%	Yes	Yes
Apr 04	90%	97.3%	96.1%	Yes	No
May 04	90%	97.3%	95.2%	Yes	No
Jun 04	90%	97.3%	89.9%	No	No
Jul 04	90%	97.3%	93.9%	Yes	No
Aug 04	90%	97.3%	97.3%	Yes	Yes
Sept 04	90%	97.3%	97.5%	Yes	Yes
Oct 04	90%	97.3%	98.2%	Yes	Yes
Nov 04	90%	97.3%	98.3%	Yes	Yes
Dec 04	90%	97.3%	95.8%	Yes	No
Jan 05	90%	97.3%	98.5%	Yes	Yes
Feb 05	90%	97.3%	98.9%	Yes	Yes
Mar 05	90%	97.3%	98.8%	Yes	Yes
Apr 05	90%	97.3%	98.7%	Yes	Yes

10 No's

22 No's



Trouble Rpts Per 100 Lines - CENTRAL DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	8	1.7	2.5	Yes	No
Sept 02	8	1.7	2.0	Yes	No
Oct 02	8	1.7	2.2	Yes	No
Nov 02	8	1.7	1.6	Yes	Yes
Dec 02	8	1.7	1.4	Yes	Yes
Jan 03	8	1.7	1.1	Yes	Yes
Feb 03	8	1.7	2.0	Yes	No
Mar 03	8	1.7	3.4	Yes	No
Apr 03	8	1.7	1.5	Yes	Yes
May 03	8	1.7	1.5	Yes	Yes
Jun 03	8	1.7	1.7	Yes	Yes
Jul 03	8	1.7	1.7	Yes	Yes
Aug 03	8	1.7	1.9	Yes	No
Sept 03	8	1.7	1.9	Yes	No
Oct 03	8	1.7	1.1	Yes	Yes
Nov 03	8	1.7	1.1	Yes	Yes
Dec 03	8	1.7	1.0	Yes	Yes
Jan 04	8	1.7	0.9	Yes	Yes
Feb 04	8	1.7	1.1	Yes	Yes
Mar 04	8	1.7	1.0	Yes	Yes
Apr 04	8	1.7	1.0	Yes	Yes
May 04	8	1.7	1.1	Yes	Yes
Jun 04	8	1.7	1.5	Yes	Yes
Jul 04	8	1.7	1.1	Yes	Yes
Aug 04	8	1.7	1.3	Yes	Yes
Sept 04	8	1.7	1.1	Yes	Yes
Oct 04	8	1.7	0.9	Yes	Yes
Nov 04	8	1.7	0.9	Yes	Yes
Dec 04	8	1.7	0.8	Yes	Yes
Jan 05	8	1.7	0.9	Yes	Yes
Feb 05	8	1.7	0.8	Yes	Yes
Mar 05	8	1.7	0.5	Yes	Yes
Apr 05	8	1.7	0.7	Yes	Yes
				0' No's	7 No's



Trouble Rpts Per 100 Lines - EAST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	8	2.5	2.9	Yes	No
Sept 02	8	2.5	3.9	Yes	No
Oct 02	8	2.5	3.7	Yes	No
Nov 02	8	2.5	2.9	Yes	No
Dec 02	8	2.5	2.3	Yes	Yes
Jan 03	8	2.5	2.4	Yes	Yes
Feb 03	8	2.5	3.1	Yes	No
Mar 03	8	2.5	4.2	Yes	No
Apr 03	8	2.5	2.6	Yes	No
May 03	8	2.5	3.1	Yes	No
Jun 03	8	2.5	2.9	Yes	No
Jul 03	8	2.5	4.2	Yes	No
Aug 03	8	2.5	4.0	Yes	No
Sept 03	8	2.5	3.7	Yes	No
Oct 03	8	2.5	2.4	Yes	Yes
Nov 03	8	2.5	2.5	Yes	Yes
Dec 03	8	2.5	2.3	Yes	Yes
Jan 04	8	2.5	2.3	Yes	Yes
Feb 04	8	2.5	2.5	Yes	Yes
Mar 04	8	2.5	2.3	Yes	Yes
Apr 04	8	2.5	2.1	Yes	Yes
May 04	8	2.5	2.5	Yes	Yes
Jun 04	8	2.5	3.6	Yes	No
Jul 04	8	2.5	2.6	Yes	No
Aug 04	8	2.5	2.5	Yes	Yes
Sept 04	8	2.5	2.5	Yes	Yes
Oct 04	8	2.5	2.2	Yes	Yes
Nov 04	8	2.5	1.9	Yes	Yes
Dec 04	8	2.5	1.8	Yes	Yes
Jan 05	8	2.5	2.0	Yes	Yes
Feb 05	8	2.5	1.7	Yes	Yes
Mar 05	8	2.5	1.2	Yes	Yes
Apr 05	8	2.5	1.5	Yes	Yes
				0 No's	14 No's



Trouble Rpts Per 100 Lines - WEST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	8	1.9	2.6	Yes	No
Sept 02	8	1.9	3.4	Yes	No
Oct 02	8	1.9	3.4	Yes	No
Nov 02	8	1.9	2.7	Yes	No
Dec 02	8	1.9	2.1	Yes	No
Jan 03	8	1.9	2.0	Yes	No
Feb 03	8	1.9	2.3	Yes	No
Mar 03	8	1.9	2.1	Yes	No
Apr 03	8	1.9	2.1	Yes	No
May 03	8	1.9	2.4	Yes	No
Jun 03	8	1.9	2.4	Yes	No
Jul 03	8	1.9	2.9	Yes	No
Aug03	8	1.9	2.7	Yes	No
Sept 03	8	1.9	2.4	Yes	No
Oct 03	8	1.9	1.7	Yes	Yes
Nov 03	8	1.9	1.8	Yes	Yes
Dec 03	8	1.9	1.7	Yes	Yes
Jan 04	8	1.9	1.9	Yes	Yes
Feb 04	8	1.9	1.8	Yes	Yes
Mar 04	8	1.9	1.8	Yes	Yes
Apr 04	8	1.9	1.8	Yes	Yes
May 04	8	1.9	1.9	Yes	Yes
Jun 04	8	1.9	2.8	Yes	No
Jul 04	8	1.9	3.3	Yes	No
Aug 04	8	1.9	2.6	Yes	No
Sept 04	8	1.9	2.0	Yes	No
Oct 04	8	1.9	1.8	Yes	Yes
Nov 04	8	1.9	1.7	Yes	Yes
Dec 04	8	1.9	1.8	Yes	Yes
Jan 05	8	1.9	1.8	Yes	Yes
Feb 05	8	1.9	1.3	Yes	Yes
Mar 05	8	1.9	1.1	Yes	Yes
Apr 05	8	1.9	1.5	Yes	Yes
				0 No's	18 No's



Trouble Clearing/24 Hours/CENTRAL DISTRICT					
	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	85%	89.9%	83.7%	No	No
Sept 02	85%	89.9%	78.5%	No	No
Oct 02	85%	89.9%	64.3%	No	No
Nov 02	85%	89.9%	78.3%	No	No
Dec 02	85%	89.9%	88.1%	Yes	No
Jan 03	85%	89.9%	87.0%	Yes	No
Feb 03	85%	89.9%	54.2%	No	No
Mar 03	85%	89.9%	31.9%	No	No
Apr 03	85%	89.9%	80.6%	No	No
May 03	85%	89.9%	75.3%	No	No
Jun 03	85%	89.9%	80.5%	No	No
Jul 03	85%	89.9%	85.4%	Yes	No
Aug 03	85%	89.9%	72.7%	No	No
Sept 03	85%	89.9%	77.2%	No	No
Oct 03	85%	89.9%	85.6%	Yes	No
Nov 03	85%	89.9%	88.3%	Yes	No
Dec 03	85%	89.9%	85.7%	Yes	No
Jan 04	85%	89.9%	87.0%	Yes	No
Feb 04	85%	89.9%	90.1%	Yes	Yes
Mar 04	85%	89.9%	95.1%	Yes	Yes
Apr 04	85%	89.9%	94.7%	Yes	Yes
May 04	85%	89.9%	90.2%	Yes	Yes
Jun 04	85%	89.9%	85.6%	Yes	No
Jul 04	85%	89.9%	88.1%	Yes	No
Aug 04	85%	89.9%	90.8%	Yes	Yes
Sept 04	85%	89.9%	90.7%	Yes	Yes
Oct 04	85%	89.9%	91.9%	Yes	Yes
Nov 04	85%	89.9%	93.2%	Yes	Yes
Dec 04	85%	89.9%	90.4%	Yes	Yes
Jan 05	85%	89.9%	92.6%	Yes	Yes
Feb 05	85%	89.9%	96.8%	Yes	Yes
Mar 05	85%	89.9%	98.6%	Yes	Yes
Apr 05	85%	89.9%	96.8%	Yes	Yes
				11 No's	20 No's



Trouble Clearing/24 Hours/EAST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	85%	89.6%	89.6%	Yes	Yes
Sept 02	85%	89.6%	87.5%	Yes	No
Oct 02	85%	89.6%	89.7%	Yes	Yes
Nov 02	85%	89.6%	89.2%	Yes	No
Dec 02	85%	89.6%	90.9%	Yes	Yes
Jan 03	85%	89.6%	96.7%	Yes	Yes
Feb 03	85%	89.6%	58.3%	No	No
Mar 03	85%	89.6%	47.5%	No	No
Apr 03	85%	89.6%	89.8%	Yes	Yes
May 03	85%	89.6%	73.7%	No	No
Jun 03	85%	89.6%	68.9%	No	No
Jul 03	85%	89.6%	64.5%	No	No
Aug 03	85%	89.6%	69.4%	No	No
Sept 03	85%	89.6%	74.6%	No	No
Oct 03	85%	89.6%	88.5%	Yes	No
Nov 03	85%	89.6%	87.2%	Yes	No
Dec 03	85%	89.6%	89.1%	Yes	No
Jan 04	85%	89.6%	92.6%	Yes	Yes
Feb 04	85%	89.6%	92.9%	Yes	Yes
Mar 04	85%	89.6%	95.3%	Yes	Yes
Apr 04	85%	89.6%	95.7%	Yes	Yes
May 04	85%	89.6%	83.0%	No	No
Jun 04	85%	89.6%	87.9%	Yes	No
Jul 04	85%	89.6%	89.4%	Yes	No
Aug 04	85%	89.6%	89.6%	Yes	Yes
Sept 04	85%	89.6%	88.1%	Yes	No
Oct 04	85%	89.6%	91.6%	Yes	Yes
Nov 04	85%	89.6%	92.9%	Yes	Yes
Dec 04	85%	89.6%	90.3%	Yes	Yes
Jan 05	85%	89.6%	92.8%	Yes	Yes
Feb 05	85%	89.6%	94.5%	Yes	Yes
Mar 05	85%	89.6%	96.5%	Yes	Yes
Apr 05	85%	89.6%	97.1%	Yes	Yes
				8 No's	16 No's



Trouble Clearing/24 Hours/WEST DISTRICT

	Industry Objective	Higher Standard Objective	Result Achieved	Industry Objective Met	Higher Standard Obj Met
Aug 02	85%	93.1%	92.9%	Yes	No
Sept 02	85%	93.1%	90.8%	Yes	No
Oct 02	85%	93.1%	85.5%	Yes	No
Nov 02	85%	93.1%	89.9%	Yes	No
Dec 02	85%	93.1%	92.5%	Yes	No
Jan 03	85%	93.1%	94.7%	Yes	Yes
Feb 03	85%	93.1%	94.8%	Yes	Yes
Mar 03	85%	93.1%	96.2%	Yes	Yes
Apr 03	85%	93.1%	96.7%	Yes	Yes
May 03	85%	93.1%	96.8%	Yes	Yes
Jun 03	85%	93.1%	95.5%	Yes	Yes
Jul 03	85%	93.1%	95.4%	Yes	Yes
Aug03	85%	93.1%	96.0%	Yes	Yes
Sept 03	85%	93.1%	96.1%	Yes	Yes
Oct 03	85%	93.1%	97.5%	Yes	Yes
Nov 03	85%	93.1%	95.9%	Yes	Yes
Dec 03	85%	93.1%	94.6%	Yes	Yes
Jan 04	85%	93.1%	94.8%	Yes	Yes
Feb 04	85%	93.1%	96.2%	Yes	Yes
Mar 04	85%	93.1%	97.1%	Yes	Yes
Apr 04	85%	93.1%	98.0%	Yes	Yes
May 04	85%	93.1%	95.5%	Yes	Yes
Jun 04	85%	93.1%	93.7%	Yes	Yes
Jul 04	85%	93.1%	92.9%	Yes	No
Aug 04	85%	93.1%	94.6%	Yes	Yes
Sept 04	85%	93.1%	94.4%	Yes	Yes
Oct 04	85%	93.1%	96.8%	Yes	Yes
Nov 04	85%	93.1%	96.2%	Yes	Yes
Dec 04	85%	93.1%	94.8%	Yes	Yes
Jan 05	85%	93.1%	96.8%	Yes	Yes
Feb 05	85%	93.1%	99.0%	Yes	Yes
Mar 05	85%	93.1%	99.3%	Yes	Yes
Apr 05	85%	93.1%	98.0%	Yes	Yes
				0 No's	6 No's



KENTUCKY
COMMISSION COMPLAINTS

MONTH	2005	2004	2003	* 2002
JANUARY	30	46	41	18
FEBRUARY	22	24	42	18
MARCH	21	39	73	18
APRIL	16	31	57	9
MAY	21	35	68	34
JUNE		30	149	23
JULY		30	158	13
AUGUST		48	190	69
SEPTEMBER		31	118	74
OCTOBER		37	63	89
NOVEMBER		18	68	46
DECEMBER		32	50	50
TOTAL	110	401	1077	461

* Jan - July - Verizon

* Aug - Dec - ALLTEL

(KENTUCKY\COMPL_99)



4A – Is it Alltel’s position that competitive local exchange carriers should be subject to the same service standards as incumbent local exchange carriers? If so, explain why.

Response: Yes. Government regulation of service quality is unnecessary in today's competitive marketplace. Customers "regulate" service quality by choosing to change service providers if they are not satisfied with the service provided by their existing carrier. Even though the market is the proper "regulator" of service quality, Kentucky Alltel has not requested to be relieved of all regulatory service quality regulation in this proceeding. Kentucky Alltel is only seeking to have its regulatory service quality standards match the existing ILEC standards provided in 807 KAR 5:061.



4B – Describe in detail why Alltel believes its current service quality service standards are “arbitrarily higher and onerous.”

Response: The service quality standards presently applied to Kentucky Alltel are onerous because they are more rigorous than those imposed on any other communications provider in Kentucky, including other ILECs. Kentucky Alltel's service quality history, see response for 3A, certainly proves that providing quality service is a priority and there is no reason to hold it to a higher standard than the other regulated ILECs providing service in Kentucky. Kentucky Alltel's competitors – cable, wireless, CLECs, VoIP, ISPs – are not, and should not be, subject to any regulatory service quality standards. Regulatory service quality standards are no longer appropriate for any provider in today's competitive marketplace. Although the ILEC regulatory service quality standards (807 KAR 5:061) have outlived their usefulness, Kentucky Alltel's is only requesting, in this proceeding, to be subject to the regulatory standards that apply to other ILECs in Kentucky.



4C – Explain in detail and provide specific examples of how the current service standards are unreasonably burdensome to Alltel.

Response: The unreasonable burden placed on Kentucky Alltel, is not a financial one, but rather it is the inequity created by holding it to a higher service quality standard than other communications providers in Kentucky, including other regulated ILECs. This unreasonable burden is shown quite clearly in the charts provided in response to 2B. Kentucky Alltel's competitors are not subject to any regulatory service quality standards, nor should they be.

Kentucky's competitive communications market and the customer choice it provides, assures service quality is a priority for all providers. Communication services such as basic local exchange service, non-basic custom calling features and advanced services are available throughout Kentucky from various competitive sources. While Kentucky Alltel must divert resources to track, measure and report regulatory service quality standards that no longer reflect competitive realities, other providers are subject to no regulatory oversight of service quality. Cable, CLECs, wireless, and VoIP providers, like Vonage, are appropriately not subject to government regulation of service quality, but rather to the service quality standards imposed by the customers they serve. In today's competitive market, regulatory service standards are no longer needed for any provider. The abundance of choice for consumers means the telecommunications market now effectively regulates service quality. Elimination of unnecessary regulations governing the telecommunications industry is overdue.



4D – Explain in detail and provide specific examples of how Alltel is “competitively disadvantage[d]” by the current service standards.

Response: Kentucky Alltel's competitors are only held to service quality standards placed on them by the communications customer and the choices they make. Kentucky Alltel is not only held to this customer created service quality standard, but also must track, measure and meet regulatory service quality standards established by the Commission and no longer necessary in today's competitive communications market.

The regulatory service quality rules in 807 KAR 5:061 became effective several years prior to the 1996 Federal Telecom Act. The communications marketplace has changed significantly since that time. The speed and magnitude of this evolution is quite obvious when compared to the prevailing conditions in 1996. Today, local telephone companies like Kentucky Alltel are competing with cable, CLECs, satellite, wireless, and VoIP providers for the same customers. Yet none of these providers are subject to the rigorous service quality standards to which Kentucky Alltel is held, nor should they be. The current competitive marketplace supports the elimination of service quality regulation.

A very real example is Kentucky Alltel's experience in Lexington. As a result of vigorous competition from Insight Cable and wireless providers in Lexington, in the 30-month period ending March 31, 2005, Kentucky Alltel experienced a net 61,200 access line decrease. If regulatory service quality standards were an important issue to customers, they would not be subscribing to service provided by companies that are not subject to regulatory service quality standards.

Kentucky Alltel is experiencing a loss of customers to wireless replacement, cable companies, VoIP providers, CLECs and ISPs. These providers aren't subject to regulatory service quality standards, nor should they be. Unlike Kentucky Alltel, these companies are able to devote their full energies to meeting the demands of the market. In fact, these competitors' service quality, especially wireless and VoIP providers like Vonage, are regulated solely by the expectations of their customers. The current marketplace is more than capable of regulating service quality.



4E – Explain in detail and provide any evidence regarding how changing Alltel’s service standard levels to those prescribed in 807 KAR 5:061 will reduce the burden on Alltel.

1. In particular discuss how measuring the same activity but applying a less stringent standard can reduce the burden on Alltel.
2. Discuss how providing a report of corrective action for failing to meet a service objective for “3 consecutive months,” as KYA is required, is more burdensome than providing the same report for “2 consecutive months,” as required by KAR 5:061, Section 4(4).
3. If any of Alltel’s discussions or explanations pertain to investment, expense or other financial related concerns, provide a full and complete analysis of those financial records that document the increased burden on Alltel. The analysis should include a detailed comparison of the current financial “burdens” with those projected under the Commission’s standard service objectives.

Response: The real burden does not result from providing service quality reports and can't be shown on financial reports. Rather, the burden is in being held to the higher regulatory service quality standards imposed only on Kentucky Alltel. No other regulated ILECs operating in Kentucky are held to these higher service quality standards.

Currently, local telephone companies, CLECs, wireless, cable, and VoIP providers, like Vonage, are all competing for the same customers. Yet, Kentucky Alltel is held to regulatory service quality standards that are outdated given today’s vibrant telecommunications market and the ability the customer has to choose the company that will provide the quality service they desire. Customers have multiple providers from which to choose to address their individual communications needs. Customers “regulate” service quality by changing communications providers if their service quality does not meet the customer’s expectations. Kentucky’s current telecommunications market is more than capable of regulating providers in general, and service quality in particular.



5 – Explain in detail and provide specific examples of how competition “justif[ies] the elimination” of all service standards.

Response: Kentucky’s current competitive telecommunications marketplace removes the need for service quality measurements imposed by regulators. Kentucky Alltel’s competitors in this market – wireless, cable, CLECs, VoIP, ISPs – are only held to the standards of their customers expectations. Kentucky Alltel is held to this standard, and the elevated standards set by the Commission.

In order to meet these elevated standards, Kentucky Alltel must divert resources that could be better spent meeting the needs of our customers. The telecommunications marketplace has changed dramatically since the introduction of service quality standards. Consumers today have the power to shop among various providers for their individual communications needs. If regulatory standards were a concern for them they would not be subscribing to companies that aren’t subject to regulatory obligations.

Entire Response 6 is Redacted

6 – Refer to the Commission’s February 13, 2002 Order in Case No. 2001-00399. At page 4 of the Order, the Commission noted that approximately 950 employees would transfer from Verizon to Alltel along with many management personnel, and at page 8, it was noted that Alltel committed to hire and train 240 new customer service workers. Provide the following employment level information for all service affecting and/or customer service related employee position categories as of August 1 of each year since the Verizon acquisition.

- (a) For each position category, supply in a tabular format the following:
 - (1) position descriptions,
 - (2) responsibilities,
 - (3) total number of employees in category,
 - (4) total number of employees in category dedicated to Kentucky operations,
 - (5) geographic area/region of responsibility, and
 - (6) average employee years-of-service.

- (b) For each position category where the number of employees has dropped since the Verizon acquisition, discuss in detail and provide any analysis that indicates whether or not service levels may have been impacted by these employee reductions.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]