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**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

TOUCHSTONE COMMUNICATIONS, INC.)
and ALEC, Inc.)
))
Complainants,)
))
vs.)
))
KENTUCKY ALLTEL, Inc.)
))
Defendant.)

**Case No.
2005-00482**

**WINDSTREAM KENTUCKY EAST, INC.'S
RESPONSES TO COMPLAINTANTS'
SECOND SET OF DATA REQUESTS**

Windstream Kentucky East, Inc. f/k/a Kentucky Alltel, Inc. ("Windstream") files the following responses to the second set of data requests submitted by TOUCHSTONE, d/b/a ALEC, Inc. ("ALEC"). Pursuant to the parties' agreement, the responses are being filed on February 9, 2007.

1. Please produce copies of all checks sent to ALEC from Windstream and its predecessors, as well as the accompanying records showing date, time periods covered and elements for which payment was issued.

RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 1: Windstream objects to this request as the material is already available to ALEC and, therefore, not properly subject to discovery. Without waiving its objection, Windstream states that any payments already made by Windstream or its predecessor to ALEC are already in ALEC's possession and ALEC also may refer to Exhibit A to Windstream's Motion to Dismiss and Answer and Windstream's Notice of Payment received in this matter by the Commission on February 2, 2007.

2. Please produce any and all settlement agreements that Windstream or its predecessors completed with ALEC in regard to reciprocal compensation or traffic (local or toll or other) usage payments.

RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 2: Windstream is not aware of any such settlement agreements.

3. Please produce copies of all evidence, whether documentary, photographic, electronic, or otherwise, you plan to introduce at the formal hearing of this matter.

RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 3: No final decision has been made at this time. Windstream further objects to this request as it is overly broad. Without waiving this objection, Windstream refers ALEC to all documents filed by Windstream in this proceeding and states that Windstream may update this request if necessary upon the filing of Windstream's testimony on February 20, 2007.

4. Please list all witnesses you intend to call to testify in this matter by way of direct testimony, as well as a complete description of each witness' name, occupation, educational background and a detailed description of the expected testimony of each witness.

RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 4: No final decision has been made at this time. Windstream currently intends to call Stephen Weeks who is the Director of Wholesale Services. Mr. Weeks began his telecommunications career in 1994 with ALLTEL Corporation, serving in various managerial positions in the wireless field operations including Vice President / General Manager. Since 1999, he has served in various managerial positions for Alltel and then with Windstream with responsibilities including negotiating inter-carrier agreements and managing inter-carrier relationships. He was named Director – Wholesale Product Management in 2003, with responsibilities for management of Windstream's switched and special access services. Windstream at this time has not identified the details of his expected testimony and will supplement as necessary with its testimony filed in this matter on February 20, 2007.

5. With respect to each expert the defendant has retained and may expect to call at the formal hearing in this matter, please state:

- (a) Identity;
- (b) Education, training, experience and field of specialty;
- (c) Subject matter of any investigation or study conducted by the expert;
- (d) Whether any written reports were completed by the expert and the date of said reports;
- (e) The person who has custody of any such reports;
- (f) Subject matter on which the expert is expected to testify;
- (g) Substance of facts and opinions to which the expert is expected to testify;
- (h) Summary of the grounds for each opinion;
- (i) Hourly rate charged by the expert;
- (j) Amount of the fee charged by the expert on this case;
- (k) Number of cases the expert has consulted or otherwise been retained on by Windstream or its predecessors;
- (l) Identification of all cases in which the expert has testified at trial or hearing.

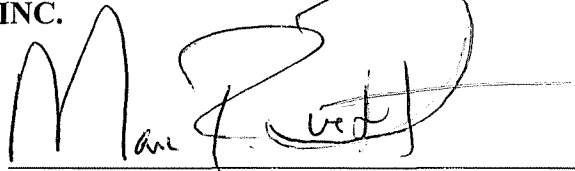
RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 5: None identified at this time.

6. Identify each and every predecessor of Windstream, including the type of entity; a description of the change in entity status; and dates of each change. Please include a chart outlining changes described herein.

RESPONSE TO SUPPLEMENTAL DATA REQUEST NO. 6: Windstream's predecessor was Verizon South, Inc. which was an ILEC serving various exchanges throughout Kentucky. The transaction between Windstream and Verizon was the result of an asset acquisition and not a merger so that no chart is appropriate. The Kentucky assets were held by Verizon and then transferred to Windstream, which was a separate and unaffiliated entity from Verizon.

Respectfully submitted,

**WINDSTREAM KENTUCKY EAST,
INC.**

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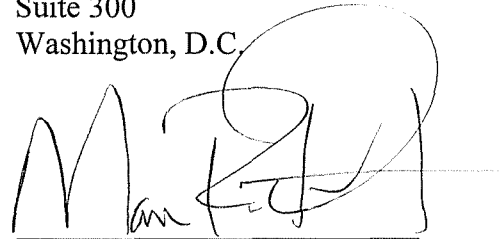
Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634
Telephone: (502) 223-3477

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 9th day of February, 2007 upon:

Jonathon A. Amlung
Amlung Law Offices
616 South Fifth Street
Louisville, Kentucky 40202

Kristopher E. Twomey
Law Offices of Kristopher E. Twomey
1725 I Street NW
Suite 300
Washington, D.C.

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', is written over a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet

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