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COMMONWEALTH OF KENTUCKY

APR 1 8 2006

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

	CARTER COUNTY ENHANCED 911)
	COMPLAINANT)
v.) CASE NO. 2006-00149
	SOUTHEAST TELEPHONE, INC. and KENTUCKY ALLTEL, INC.)))
	DEFENDANTS)

ANSWER

SouthEast Telephone, Inc., ("SouthEast") by and through counsel, files the following Answer to the Complaint by Carter County Enhanced 911:

SouthEast Telephone received notice on March 16, 2006, that there was a problem with the information received by the Enhanced 911 Emergency Telephone Service in Carter County. SouthEast fully understands the seriousness of the situation at bar; however, there are limitations on SouthEast's ability to update this information. SouthEast does not have access to Alltel's database; therefore unfortunately we can not upload the 911 address listings in-house. We can only submit the listings to Alltel, with the hope that they will upload the information into the database in a timely manner. It is this fact that makes us dependent not only on our own system, but Alltel's, as well. SouthEast currently maintains documentation evidencing that we have been sending the 911 address updates on a daily basis, including that of Lina Spillman. It must also be stressed that the spreadsheet we have been using to supply the 911 address information was provided to us by Alltel for this exact purpose.

Despite the limitations placed upon SouthEast's ability to update the information we have been doing everything within our power to correct the problem. We developed and began utilizing a tool to more effectively add customers to the 911 database on March 22, 2006. (See Attachment 1) This tool allows our provisioning department to enter records into the system using a web interface and extract a Nena 2.1 standard file up to 9 times per day. Once the extraction is performed, it is e-mailed to Enoch Morris at Alltel for processing. It is important to note that even with the utilization of the new tool, SouthEast will remain reliant upon Alltel to upload the information into their database in a timely manner.

Since the mis-fortunate incident involving Ms. Spilman, SouthEast has also compiled a list of all customers that have switched their local service to our company and were still our customers as of the date of the implementation of the new tool. It is worth noting that all of the information in the compilation has already been submitted to Alltel daily, on the spreadsheet supplied by Alltel. This bulk of current 911 information was re-sent to Alltel on April 13, 2006. (See attachment 2) Unfortunately, the promptness and accuracy at which this information is updated into the database is completely beyond SouthEast's control.

Respectfully submitted,

SOUTHEAST TELEPHONE, INC.

Bethany Bow Upon R
Bethany Bowersock

SouthEast Telephone, Inc.

106 Scott Ave.

P.O. Box 1001

Pikeville, KY 41502

(606) 432-3000

beth.bowersock@setel.com

CERTIFICATE OF SERVICE

Kentucky Alltel, Inc. Enoch Morris 2000 Highland Road Twinsburg, OH 44087

Bethany Bowersock

Counsel for SouthEast Telephone, Inc.

Email Message

(Page 1 of 1)

Date: 17-Apr-2006 14:11 -0400 From: SMB (Steve Brinager)

To: BLB, LAT

Subject: (fwd) 911 Data File

Re-Sent-By: SMB (Steve Brinager); on 17-Apr-2006 14:11 -0400

Date: 21-Mar-2006 14:52 -0500 From: SMB (Steve Brinager)
To: enoch.morris@alltel.com

BCC: DS, ORM, wes.maynard@setel.com

Subject: 911 Data File

Beth/Liz,

Here is the email I sent Enoch the day before we started using the web based 911 interface.

----Original Message---Date: 21-Mar-2006 14:52 -0500
From: SMB (Steve Brinager)
Subject: 911 Data File

Enoch,

I'm making a couple of tweaks to the user interface for our 911 tool, but by this evening, we should be putting real records into it. Hopefully, we'll be sending you a data file tomorrow morning. Until I get the automated transfer working, would it be acceptable for Oma to just email you the data files in place of the spreadsheets or would you prefer I pload them manually through the dial-up interface?

Steve Brinager
Software Engineer
SouthEast Telephone
106 Scott Avenue
Pikeville, Ky 41501
606-432-3000 ext. 413
steve.brinager@setel.com

It is literally true that you can succeed best and quickest by helping others to succeed.

-- Napoleon Hill

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Email Message

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Date: 13-Apr-2006 15:21 -0400

From: ORM (Oma Miller) To: enoch.morris@alltel.com

Subject: bcc: Alltel SET Customer List

Attachment: 009BFC4F

Attachment-name: 911_ALLTEL_COMBINED.xls

Enoch,

This is the combined list of all active Alltel SouthEast Telephone customers. These are records that have already been submitted in the past. Please make sure that all the past records prior to SouthEast Telephone utilizing the newly developed tool are in the 911 database.

If you have any questions, please let me know.

Oma Miller Director of Provisioning SouthEast Telephone 606-432-3000 ext 350