

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MOUNTAIN RURAL TELEPHONE)
COOPERATIVE CORPORATION)

COMPLAINANT)

V.)

KENTUCKY ALLTEL, INC.)

RESPONDENT)

CASE NO. 2006-00198

RECEIVED

SEP 28 2006

PUBLIC SERVICE
COMMISSION

WINDSTREAM KENTUCKY EAST, INC.'S RESPONSES TO THE DATA REQUESTS
BY MOUNTAIN RURAL TELEPHONE COOPERATIVE CORPORATION

Comes now Windstream Kentucky East, Inc. f/k/a Kentucky Alltel, Inc. ("Windstream") and submits the following Responses to the Data Requests served by Mountain Rural Telephone Cooperative Corporation ("Mountain Rural") dated September 14, 2006. Windstream objects to all of Mountain Rural's data requests that seek information regarding Windstream's "legal basis" for its positions in this proceeding. Legal theories and conclusions are not discoverable items and are properly the subjects of parties' legal briefs and reply briefs. Windstream also states that as all of Mountain Rural's data requests seek generally "each and every factual" basis for a variety of items, such requests are vague and overly broad. Without waiving any objection to the requests, Windstream provides the following responses.

1. **MOUNTAIN RURAL REQUEST NO. 1:** State each and every factual and legal basis for Windstream's refusal to pay the traffic sensitive portion of Mountain Rural's switched access service charges.

WINDSTREAM RESPONSE NO. 1: This question is inappropriate as Windstream has not refused to pay and in fact has paid traffic sensitive charges to Mountain Rural. Please see Attachment A. See also Paragraph 2 of Windstream's Motion to Dismiss, for Discovery, and for Injunctive Relief and Answer which states explicitly that "Kentucky Alltel does not dispute the [traffic sensitive] charges."

2. **MOUNTAIN RURAL REQUEST NO. 2:** State each and every factual and legal basis for Windstream's refusal to pay the facilities charges portion of Mountain Rural's switched access service charges.

WINDSTREAM RESPONSE NO. 2: Windstream has not refused to pay all facilities charges to Mountain Rural. Subject to verification and Mountain Rural's proper invoicing, Windstream has paid facilities charges that are appropriately billed to Windstream. Specifically, Windstream has remitted payment to Mountain Rural with respect to circuits billed beginning January 2006. Windstream disputes circuit billings prior to December 2005 as those trunks were jointly provisioned two-way facilities provided in accordance with a Meet Point arrangement. In a Meet Point arrangement, each party is responsible for providing facilities to the meet point, and neither party is responsible for facilities beyond its meet point. Finally, Windstream disputes the amount of the circuits billed for December 2005 due to the fact that Mountain Rural had not provided Windstream at that time sufficient notice of the network change (*i.e.*, removal of non-Windstream traffic from the Meet Point Jointly Provisioned trunk groups) enabling Windstream to reduce the size of the trunks to the appropriate levels.

3. **MOUNTAIN RURAL REQUEST NO. 3:** State each and every factual and legal basis for Windstream's refusal to pay the Non-Traffic Sensitive ("NTSR") portion of Mountain Rural's switched access service charges.

WINDSTREAM RESPONSE NO. 3: Please refer to Windstream's Motion to Dismiss, for Discovery, and for Injunctive Relief and Answer and all other pleadings filed by Windstream in the instant proceeding which set forth Windstream's position with respect to Mountain Rural's NTS charges. Windstream states further that Response No. 3 is subject to the data requests served by Windstream on Mountain Rural in this proceeding, Mountain Rural's responses thereto, and further discovery that may be had by the parties.

4. **MOUNTAIN RURAL REQUEST NO. 4:** If you contend that Windstream's ACS minutes are not subject to all three components of Mountain Rural's switched access service charges as identified in the previous three data requests, state each and every factual and legal basis for that contention. Your explanation should separately address each component of Mountain Rural's switched access service charges.

WINDSTREAM RESPONSE NO. 4: As this request seeks the same information as that sought in Requests No. 1 through 3, please see Responses No. 1 through 3 above.

Respectfully submitted,



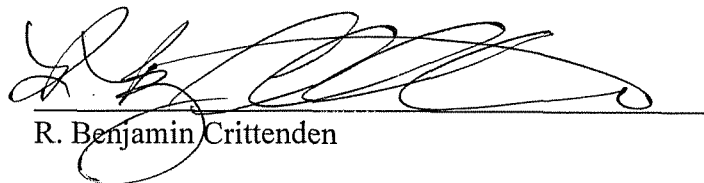
Mark R. Overstreet
R. Benjamin Crittenden
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
Telephone: 502-223-3477
COUNSEL FOR:
WINDSTREAM KENTUCKY EAST, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Windstream Kentucky East, Inc.'s Responses to the Data Requests by Mountain Rural Telephone Cooperative Corporation was served via United States Postal Service, First Class Mail, postage prepaid, upon:

John E. Selent
Edward T. Depp
Holly C. Wallace
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

on this the 28th day of September, 2006.



R. Benjamin Crittenden

ATTACHMENT A



ALLTEL Communications
Wireline Revenue Accounting
One Allied Drive
1269-B4F03-NC
Little Rock, AR 72202-2099

Mountain Rural Telephone COOP, Inc.
405 Main Street
West Liberty, KY 41472

May 17, 2006

Enclosed are checks in the total amount of \$60,403.49, with respect to the intrastate/intralata traffic sensitive portion of the Mountain Rural CABS invoices for usage periods 11/26/05-4/24/06. Additionally, Angie Pennington forwarded information to me today regarding the facility circuits, and payment with respect to the facility invoices will follow upon verification of the circuit charges.

As documented in an email from John Bratton to Eileen Bodamer on 11/18/05 and in communications between the parties, Kentucky Alltel disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Kentucky Alltel will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.

Please let me know if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Janann H. Johnson".

Janann H. Johnson



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 35
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber: 002

BAN: 666

Bill Date: 2/1/2006

State: KY (9690)

Dispute Reason Invalid Usage

Dispute Amount: \$49,308.77

Dispute Amt W/Held: \$49,308.77

Payment Amount: \$32,788.88

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute which is currently subject to a complaint pending before the Kentucky Public Service Commission. Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 34
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	2/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$91.94
Dispute Amt W/Held:	\$91.94
Payment Amount:	\$32,788.88
Dispute Description:	Windstream is an ILEC and, therefore, cannot cross state boundaries. Interstate usage should be billed to the applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 545
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	D.ALT.1.6
BAN:	0414FGD0666
Bill Date:	8/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$4,222.10
Dispute Amt W/Held:	\$4,222.10
Payment Amount:	\$7,039.02
Dispute Description:	Paying \$80.75 for July invoice. Remainder of late charges are under dispute because they apply to carrier common line, interstate, and interlata charges.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 544
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	8/1/2006
State:	KY (9690)
Dispute Reason	Invalid Factors
Dispute Amount:	\$11,225.65
Dispute Amt W/Held:	\$11,225.65
Payment Amount:	\$7,039.02

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit the payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 543
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	8/1/2006
State:	KY (9690)
Dispute Reason	Incorrect Customer Being Billed
Dispute Amount:	\$1 74
Dispute Amt W/Held:	\$1 74
Payment Amount:	\$7,039.02
Dispute Description:	Windstream is an ILEC and therefore can not cross the LATA boundaries. Interlata usage should be billed to the applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 542
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	8/1/2006
State:	KY (9690)
Dispute Reason	Incorrect Customer Being Billed
Dispute Amount:	\$18.74
Dispute Amt W/Held:	\$18.74
Payment Amount:	\$7,039.02
Dispute Description:	Windstream is an ILEC and therefore cannot cross state boundries interstate usage should be billed to the applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 549
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	D.ALT.1.7
BAN:	0414FGD0666
Bill Date:	9/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$4,344.52
Dispute Amt W/Held:	\$4,344.52
Payment Amount:	\$7,115.33
Dispute Description:	Late charges are under dispute because they apply to carrier common line. Interstate and interlata charges



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 548
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	9/1/2006
State:	KY (9690)
Dispute Reason	Invalid Factors
Dispute Amount:	\$11,276.57
Dispute Amt W/Held:	\$11,276.57
Payment Amount:	\$7,115.33

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 547
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	9/1/2006
State:	KY (9690)
Dispute Reason	Incorrect Customer Being Billed
Dispute Amount:	\$0.35
Dispute Amt W/Held:	\$0.35
Payment Amount:	\$7,115.33
Dispute Description:	Windstream is an ILEC and therefore cannot cross LATA boundaries. Interlata usage should be billed to the applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 546
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	9/1/2006
State:	KY (9690)
Dispute Reason	Incorrect Customer Being Billed
Dispute Amount:	\$17.80
Dispute Amt W/Held:	\$17.80
Payment Amount:	\$7,115.33
Dispute Description:	Windstream is an ILEC and therefore cannot cross state boundaries interstate usage should be billed to applicable long distance carrier



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 535
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	12
BAN:	0414FGS0666
Bill Date:	12/1/2005
State:	KY (9690)
Dispute Reason	Overbilling
Dispute Amount:	\$321.05
Dispute Amt W/Held:	\$321.05
Payment Amount:	\$2,062.56
Dispute Description:	Portion of sales tax attributable to over-billing of circuit



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 534
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	12/1/2005
State:	KY (9690)
Dispute Reason	Overbilling
Dispute Amount:	\$5,350.99
Dispute Amt W/Held:	\$5,350.99
Payment Amount:	\$2,062.56

Dispute Description: Windstream disputes the amounts listed above on the Dec-05 bill for circuits due to the fact that MRTC did not provide Windstream sufficient Notice of the network change (removal of non-Windstream traffic from the Meet Point Jointly Provisioned trunk groups) enabling Windstream to reduce the size of the trunks to the appropriate levels



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 552
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	D.ALT.1.5
BAN:	0414FGD0666
Bill Date:	7/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$4,169.74
Dispute Amt W/Held:	\$4,169.74
Payment Amount:	\$7,572.19
Dispute Description:	Late payments charges are associated with disputed (CCL) invoice items.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 551
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	7/1/2006
State:	KY (9690)
Dispute Reason	incorrect Customer Being Billed
Dispute Amount:	\$0.95
Dispute Amt W/Held:	\$0.95
Payment Amount:	\$7,572.19
Dispute Description:	Windstream is an ILEC, and therefore, cannot cross LATA boundaries. All InterLATA usage should be billed to the applicable long distance carrier



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 550
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	7/1/2006
State:	KY (9690)
Dispute Reason	Incorrect Customer Being Billed
Dispute Amount:	\$11.12
Dispute Amt W/Held:	\$11.12
Payment Amount:	\$7,572.19
Dispute Description:	Windstream is an ILEC and, therefore, cannot cross state boundaries. All interstate usage should be billed to the applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 541
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	7/1/2006
State:	KY (9690)
Dispute Reason	Invalid Factors
Dispute Amount:	\$12,219.99
Dispute Amt W/Held:	\$12,219.99
Payment Amount:	\$7,572.19

Dispute Description: Windstream disputes the CCL charges on ACS traffic Until the parties resolve the CCL dispute , which is currently subject to a complaint pending before the Kentucky Public Service commision, Windstream will remit the payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 37
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	003
BAN:	666
Bill Date:	3/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$15,832.50
Dispute Amt W/Held:	\$15,832.50
Payment Amount:	\$12,006.26

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 36
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	3/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$25.32
Dispute Amt W/Held:	\$25.32
Payment Amount:	\$12,006.26

Dispute Description: Windstream is an ILEC and, therefore, cannot cross state boundaries. Usage should be billed to applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 40
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber: 004

BAN: 666

Bill Date: 4/1/2006

State: KY (9690)

Dispute Reason: Invalid Usage

Dispute Amount: \$17,221.40

Dispute Amt W/Held: \$17,221.40

Payment Amount: \$13,076.85

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 39
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	4/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$38.78
Dispute Amt W/Held:	\$38.78
Payment Amount:	\$13,076.85
Dispute Description:	Windstream is an ILEC and, therefore, cannot cross state boundaries. Usage should be billed to applicable long distance carrier



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 38
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	4/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$6,071.11
Dispute Amt W/Held:	\$6,071.11
Payment Amount:	\$13,076.85

Dispute Description: Winstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Winstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 43
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber: 005

BAN: 666

Bill Date: 5/1/2006

State: KY (9690)

Dispute Reason Invalid Usage

Dispute Amount: \$31.87

Dispute Amt W/Held: \$31.87

Payment Amount: \$11,213.76

Dispute Description: Windstream is an ILEC and, therefore, cannot cross state boundaries. Usage should be billed to applicable long distance carrier.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 42
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	5/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$13,634.43
Dispute Amt W/Held:	\$13,634.43
Payment Amount:	\$11,213.76

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 41
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	5/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$9,461.17
Dispute Amt W/Held:	\$9,461.17
Payment Amount:	\$11,213.76

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 199
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

InvoiceNumber:	006
BAN:	666
Bill Date:	6/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$13,965.56
Dispute Amt W/Held:	\$13,965.56
Payment Amount:	\$10,789.03

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 198
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	6/1/2006
State:	KY (9690)
Dispute Reason	Late Payment Charge Invalid
Dispute Amount:	\$16,690.80
Dispute Amt W/Held:	\$16,690.80
Payment Amount:	\$10,789.03

Dispute Description: Windstream disputes the CCL charges on ACS traffic. Until the parties resolve the CCL dispute, which is currently subject to a complaint pending before the Kentucky Public Service Commission, Windstream will remit payment to Mountain Rural only with respect to the traffic sensitive portion of the CABS invoices.



Disputed Invoices

Mountain Rural Telephone

Date of Claim: 9/22/2006
Claim #: 197
Contact Name: Tracie Johnson
Contact Phone: 501-748-6918
Contact Email: Tracie.L.Johnson@Windstream.com

Bill Date:	6/1/2006
State:	KY (9690)
Dispute Reason	Invalid Usage
Dispute Amount:	\$16.13
Dispute Amt W/Held:	\$16.13
Payment Amount:	\$10,789.03

Dispute Description: Windstream is an ILEC and, therefore, cannot cross state boundaries. Usage should be billed to applicable long distance carrier.



Date of Claim	7/31/06
Contact Name	Tracie L. Johnson
Contact Phone	501.748.6918
Contact Email	Tracie.L.Johnson@Windstream.com
DISPUTE INFORMATION	
BAN	666
State	KY
Dispute Reason	Overbilling
Dispute Amount	\$18,016.38
Dispute Amt W/Held	\$18,016.38
Payment Amount	\$0.00
Dispute Description	Windstream disputes the facility bills for June 2004 through November 2005 usage on the basis that during the billed period trunks were jointly provisioned two-way facilities provided in accordance with a Meet Point arrangement. In a Meet Point arrangement, each party is responsible for providing facilities to the meet point. Neither party is responsible for facilities beyond its meet point.