

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RECEIVED

MOUNTAIN RURAL TELEPHONE)
COOPERATIVE CORPORATION)
COMPLAINANT)

OCT 19 2006

PUBLIC SERVICE
COMMISSION

V.) CASE NO. 2006-00198

KENTUCKY ALLTEL, INC.)
RESPONDENT)

WINDSTREAM KENTUCKY EAST, INC.'S RESPONSES TO THE SUPPLEMENTAL
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 Supplemental Data Requests served by Mountain Rural Telephone Cooperative Corporation ("Mountain Rural") dated October 4, 2006. Windstream objects to any Mountain Rural data request that seeks information generally regarding "undisputed charges." Three types of charges are at issue between the parties (*i.e.*, traffic sensitive, non-traffic sensitive, and facilities), making Mountain Rural's reference to "charges" vague and ambiguous. Windstream, nevertheless, has made an attempt in good faith to answer the data requests based on Windstream's assumptions as to which charges Mountain Rural may be referring. Windstream further objects to the requests which (i) are not further supplements to the first data requests served by Mountain Rural; (ii) seek information which is publicly available in this proceeding or already available to Mountain Rural in its own records; and (iii) are improperly formatted requests for admissions. However, in an effort to move the parties closer to resolution and without waiving any objection to the requests, Windstream provides the following responses.

1. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 1:** Did Windstream, or its counsel, receive a letter from Holly Wallace dated June 14, 2006 and addressed to Mark Overstreet stating that Mountain Rural may terminate Windstream for non-payment of undisputed charges?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 1: Attached as Exhibit A is a letter received by Windstream and dated June 14, 2006 from Holly Wallace to Mark Overstreet. Also included in Exhibit A is a letter from Mark Overstreet to Holly Wallace dated June 19, 2006. That letter responds to the June 14, 2006 correspondence and requests invoices from Mountain Rural to support the assertions by Mountain Rural which were in conflict with Mountain Rural's prior billings. Those prior billings to Windstream reflected a credit balance for facilities charges.

Exhibit A

Dinsmore & Shohl LLP
ATTORNEYS

Holly C. Wallace
(502) 540-2309 (Direct Dial)
holly.wallace@dinslaw.com

June 14, 2006

VIA FACSIMILE AND U.S. MAIL

Mark R. Overstreet, Esq.
Stites & Harbison
421 W. Main Street
P.O. Box 634
Frankfort, KY 40602-0634

RE: *Mountain Rural Telephone Cooperative Corporation, Inc. v. Kentucky Alltel, Inc.; Case No. 2006-00198*

Dear Mark:

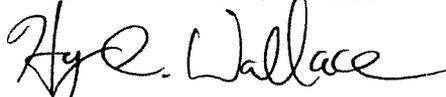
On May 12, 2006, W.A. Gillum, General Manager of Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain Rural") sent a letter via Certified U.S. Mail to Ms. Janan Johnson informing her that Mountain Rural would terminate services to Kentucky Alltel, Inc. ("Alltel") billed under Account No. 666 on June 12, 2006 pursuant to 807 KAR 5:006, §13 and 14.

The June 12, 2006 termination date has passed, and Alltel has still not paid all outstanding undisputed charges. Pursuant to 807 KAR 5:006, §14, and in accordance with Mr. Gillum's letter to Ms. Johnson dated May 12, 2006, Mountain Rural may terminate Alltel for non-payment of undisputed charges incurred without further notice to Alltel. *We urge Alltel* to either immediately pay all undisputed charges, or make arrangements for the termination of traffic from Alltel's end users to Mountain Rural's end users via an inter-exchange carrier such as Alltel Communications, Inc. Such alternate arrangements should result in minimal, if any, disruption of service. No further notice will be provided to Alltel.

Thank you and if you have any questions with regard to this matter, please call me at (502) 540-2309.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

cc: Beth O'Donnell
David S. Samford, Esq.
Amy E. Dougherty, Esq.
John E.B. Pinney, Esq.
John E. Selent, Esq.
Edward T. Depp, Esq.

June 19, 2006

VIA E-MAIL AND FIRST CLASS U.S. MAIL

Mark R. Overstreet
(502) 209-1219
(502) 223-4387 FAX
moverstreet@stites.com

Holly C. Wallace
Dinsmore & Shohl, LLP
500 West Jefferson Street
1400 PNC Plaza
Louisville, KY 40202-2810

Re: P.S.C. Case No. 2006-00198

Dear Holly:

This is in response to your letter dated June 14, 2006, threatening immediate disconnection of services to Kentucky Alltel by Mountain Rural and as a follow-up to the parties' conference call with Commission Staff. In your letter you asserted there were undisputed charges owed by Kentucky Alltel that subsequently were identified during the call as totaling "\$30,000 to \$40,000." As stated during the call, Kentucky Alltel is not aware of any such outstanding undisputed charges with the single exception of the late payment charges in the amount of \$899.01 with respect to the traffic sensitive charges previously paid. A copy of Kentucky Alltel's check in the amount of \$899.01 is attached. It was sent to Mountain Rural via overnight delivery on June 14, 2006.

With regard to your client's request for verification, also attached is a series of email communications between Angie Pennington of Mountain Rural and Janann Holmes of Alltel demonstrating that verification of the facilities charges already had taken place prior to your June 14, 2006 letter and had resulted in a credit in the amount of \$24,809.69 on the invoice from Mountain Rural to Kentucky Alltel for the period June 1, 2006 through June 30, 2006. A copy of that invoice is also attached. As noted in the email communications, Kentucky Alltel requested the appropriate invoices from Mountain Rural as early as March 29, 2006. Ms. Holmes followed up by telephone with "Alicia" at Mountain Rural after which Ms. Pennington responded with her May 16, 2006 email. On May 17, 2006, Ms. Holmes again requested information from Mountain Rural regarding the "TSC/PON and from/to points for the circuit" in order to verify that the circuits Mountain Rural was billing were still in place. Alltel also requested information regarding the number of T1s that Mountain Rural was billing and the associated mileage. In Mountain Rural's May 24, 2006 email, Ms. Pennington notes that "a credit will be calculated during billing" and that the overcharge by Mountain Rural occurred when its billing clerk was not made aware of the facilities change. These overcharges resulted in a credit to Kentucky Alltel as reflected on the June invoice.

Holly C. Wallace

June 19, 2006

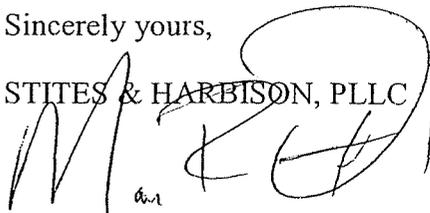
Page 2

Finally, as Kentucky Alltel requested during the conference call last week, if your clients have information contrary to the latest invoice provided by Mountain Rural to Kentucky Alltel, please forward it to our attention immediately along with a reconciliation of that information to the credit on the June invoice. To date, Kentucky Alltel has not received anything from Mountain Rural in support of the "\$30,000 to \$40,000" outstanding balance asserted during the call.

We appreciate your attention to these matters.

Sincerely yours,

STITES & HARBISON, PLLC


Mark R. Overstreet

cc: Amy E. Dougherty

-----Original Message-----

From: Angie Pennington [mailto:apennington@mountaintelephone.com]
Sent: Wednesday, May 24, 2006 10:03 AM
To: Holmes, Janann
Cc: sison@mountaintelephone.com
Subject: RE: Alltel Billing

D701304 is a disconnect order. The DD was 12/16/05 but the order was not completed until sometime in January. The credit will be calculated during billing so I'm not sure what it will be yet.

According to our records, Alltel had 8 T1's total - and 5 were disconnected leaving 3 - 2 to the tandem and 1 to our switch. So yes, we do show a total of 3 now. We had 7.5 on the CABS bill because the T1 to our switch used to be split to half to the switch and the other half to the tandem. At some point that was changed and the billing clerk was not made aware of it. That will also be corrected on the bill in June.

Angie

-----Original Message-----

From: Janann.Holmes@alltel.com [mailto:Janann.Holmes@alltel.com]
Sent: Monday, May 22, 2006 3:41 PM
To: apennington@mountaintelephone.com
Cc: sison@mountaintelephone.com
Subject: RE: Alltel Billing

I made a mistake on the last circuit ID - the 120 s/b to the WLBTKYXADS1 switch, not the tandem. Sorry!

-----Original Message-----

From: Holmes, Janann
Sent: Monday, May 22, 2006 2:13 PM
To: 'apennington@mountaintelephone.com'
Cc: Shayne
Subject: RE: Alltel Billing
Importance: High

Angie - although our circuit ids are different than what you have listed, we show 7 T1s in service until 12/16/05. Four T1's shb disconnected as of 12/16/05 (we show 102-105 disconnected). Can you please answer some more questions for me?

1.) For the order listed below - D701304 - do you show that order as a disconnect order & credit will be issued to ALLTEL for 12/16/05-5/31/06? (I want to clarify the meaning of "re-groom".) If you do show as a disconnect order, can you provide the credit amount and calculation, that will be issued on the 6/1/06 bill?

2.) We show only 7 T1s were in service up thru 12/16/05. How is the 7.5 derived?

3.) As of 12/16/05, we show 3 T1s still in service - a 101/T1/MRHDKYXA02T/WLBTKYXA01T; 101/T1/MRHDKYXA02T/WLBTKYXADS1; 102/T1/MRHDKYXA02T/WLBTKYXA01T. Do you show the same?

Please let me know ASAP! I would like to get this issue completely resolved by month end.

THANKS!

-JHJ-

-----Original Message-----

From: Angie Pennington [mailto:apennington@mountaintelephone.com]

Sent: Wednesday, May 17, 2006 11:01 AM

To: Holmes, Janann

Cc: Shayne

Subject: RE: Alltel Billing

The trunks have actually been in place since the 80's so unfortunately, we longer have the original order. I do have an order to augment the existing group from 2000. It's GTE order GN03773.006. Circuit ID's are 102/T1/MRHDKYXA02T/WLBTKYXA01T thru 108/T1/MRHDKYXAK01/WLBTKYXA01T. Maybe this helps? We do have an order pending in billing that will appear on the next bill to re-groom the trunk group - ORD# D701304. This may help as well.

There are 7.5 T1's and the POP is Winchester which is 51 miles.

I'm happy to answer any questions that you might have.

Angie

-----Original Message-----

From: Janann.Holmes@alltel.com [mailto:Janann.Holmes@alltel.com]

Sent: Wednesday, May 17, 2006 10:43 AM

To: apennington@mountaintelephone.com

Cc: sison@mountaintelephone.com

Subject: RE: Alltel Billing

Importance: High

Angie - I understand what the bill is for, but I have to verify that the circuit I'm getting billed for is/was actually in place & is a 1 way to you, or 2 way circuit & is carrying our traffic. Can you please supply the TSC/PON and from/to points for the circuit so I can send to my ICSC group & get it verified? Once I am able to verify the circuit exists/existed, I can get the bills submitted for payment.

I do have one question regarding the quantities - the facility has 382.5 - how many T1's are you billing & what is the mileage for each? Please answer the same question for the term charges.

Sorry to have to ask all the questions, but normally I receive a CSR for circuit charges & can figure this out for myself.

Please let me know ASAP!

THANKS!

-JHJ-

-----Original Message-----

From: Angie Pennington [mailto:apennington@mountaintelephone.com]

Sent: Wednesday, May 17, 2006 9:16 AM

To: Holmes, Janann

Cc: sison@mountaintelephone.com

Subject: RE: Alltel Billing

Janann,

The facilities bill that Alltel has is for the direct trunk transport or flat fee for FGD service. It is based on the number of T1's that are in place. When BellSouth took their traffic off the Intralata route, Alltel re-groomed the trunks and some of the T1's were disconnected at that time. Our Central Office staff worked with Sherri Bingham and Steven Weeks at Alltel on the re-groom. I would suspect that all NECA companies that you have trunks with would bill this type of facility charge. If you need the tariff sections that support direct trunk transport, just let me know and I can provide that as well.

Angie

-----Original Message-----

From: Janann.Holmes@alltel.com [mailto:Janann.Holmes@alltel.com]
Sent: Tuesday, May 16, 2006 5:17 PM
To: apennington@mountaintelephone.com
Cc: sison@mountaintelephone.com
Subject: RE: Alltel Billing

Angie - I did actually call earlier today (around 1:00/2:00) regarding the facility invoice that we have been receiving from MRTC. The circuit ID listed on the bill is not the circuit ID ALLTEL uses. I talked w/ Alicia & requested a TSC, order number, contact name/number or some other type of identification so we can verify the circuit & get the bill in for payment. She told me that the circuit had been disconnected effective 5/9/06 & I requested the same info again (for the disconnect), hoping to find someone (w/in ALLTEL) that can verify the circuit was truly in place between ALLTEL & MRTC during the time period billed. She told me she would pull the file & call me back.

Could you please make sure I get that information asap?

THANKS!

-JHJ-

-----Original Message-----

From: Angie Pennington [mailto:apennington@mountaintelephone.com]
Sent: Tuesday, May 16, 2006 3:27 PM
To: Holmes, Janann
Cc: Shayne
Subject: RE: Alltel Billing

Janann,

Please e-mail any questions that you may have and we'll try to answer them promptly.

Thanks,

Angie Pennington
Office Manager
Mountain Telephone

-----Original Message-----

From: Janann.Holmes@alltel.com [mailto:Janann.Holmes@alltel.com]
Sent: Wednesday, March 29, 2006 11:10 AM
To: apennington@mountaintelephone.com
Subject: RE: Alltel Billing

Angie - We're trying to get payments ready to send to Mtn Rural. However, I only have the 3/06 usage invoice. Could you please fax (501-905-6878) or email the invoices between the Nov '05 date on the spreadsheet & the 3/1/06 invoice that I do have? I am also missing the 2/1/06 invoice for the special access account. Could you please also send it?

THANKS!

-JHJ-

-----Original Message-----

From: Angie Pennington [mailto:apennington@mountaintelephone.com]
Sent: Monday, February 06, 2006 11:50 AM
To: Holmes, Janann
Subject: Alltel Billing

Janann,

The spreadsheet detailing the previous balance on your access bill is attached. There is also a previous balance on the facility bill as well that is not reflected on the statement itself but is included in the spreadsheet. Please let me know if you have questions.

Thanks,

Angie Pennington
Office Manager
Mountain Telephone

The information contained in this message, including attachments, may contain privileged or confidential information that is intended to be delivered only to the person identified above. If you are not the intended recipient, or the person responsible for delivering this message to the intended recipient, ALLTEL requests that you immediately notify the sender and asks that you do not read the message or its attachments, and that you delete them without copying or sending them to anyone else.

2. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 2:** Did Windstream, by counsel, advise Mountain Rural and Commission staff during a teleconference on June 20, 2006 that it did not owe Mountain Rural payment for undisputed charges?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 2: To the extent that the question is referring to undisputed facilities charges, Windstream notified Mountain Rural and Commission staff during a teleconference that Windstream was unaware of any outstanding balance with respect to facilities charges since the only invoices provided to Windstream from Mountain Rural at that time noted a credit balance to Windstream.

3. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 3:** On September 19, 2006, did Windstream pay Mountain Rural for undisputed facilities charges incurred from December 2005 through September 2006?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 3: On September 19, 2006, Windstream submitted a check to Mountain Rural in the amount of \$17,512.29, representing payment for undisputed facilities charges incurred from January 2006 through September 2006. On September 19, 2006, Windstream paid \$1,945.81 of facilities charges and \$116.75, the associated state tax, for December 2005, although \$5,350.99 of the December 2005 facilities charges remain in dispute.

4. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 4:** On September 19, 2006, did Windstream pay Mountain Rural for undisputed traffic-sensitive charges incurred from July 2006 through September 2006?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 4: No, Windstream did not pay for the months indicated above since usage charges are billed in arrears. Accordingly, on September 19, 2006, Windstream paid undisputed traffic-sensitive charges incurred for the following usage periods:

Invoice #	Invoice Date / Payment Due Date	Usage Period
D.ALT.1.7	09/01/2006 / due on 10/01/06	07/25/2006 – 08/24/2006
D.ALT.1.6	08/01/2006 / due on 08/31/06	06/25/2006 – 07/24/2006
D.ALT.1.5	07/01/2006 / due on 07/31/06	05/25/2006 – 06/24/2006

5. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 5:** When did Windstream first realize it owed Mountain Rural payment for the undisputed facilities charges referenced in Request No. 3?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 5: As stated in the response to Supplemental Data Request No. 2 above, during the parties' conference call with the Commission staff, Mountain Rural asserted that there were facilities charges other than those reflected in the invoices to Windstream which at that time showed a credit balance. Windstream then became aware that there may have been outstanding undisputed facilities charges which were not reflected in those invoices. Previously, Windstream had been working with Mountain Rural to verify facilities charges for many months since the invoices received by Windstream on January 17, 2006 (for December 2005 and January 2006 facilities) were incorrect. The invoices continued to reflect incorrect facilities charges until Mountain Rural applied the appropriate credit in June 2006. After Commission staff instructed Mountain Rural to provide Windstream invoices for the asserted remaining facilities charges and after Windstream received and reviewed the information provided by Mountain Rural, Windstream determined that there were undisputed facilities charges due to Mountain Rural for the periods January 2006 forward. A portion of the December 2005 facilities charges remains in dispute.

6. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 6:** When did Windstream first realize it owed Mountain Rural payment for the undisputed traffic-sensitive charges referenced in Request No. 4?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 6: With respect to traffic-sensitive charges for the respective usage periods referenced in Supplemental Request No. 4, Windstream realized it owed for those charges when it received Invoices D.ALT.1.5, D.ALT.1.6, and D.ALT.1.7 and verified any disputes with respect to the invoices.

7. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 7:** When, if at all, did Windstream advise the Commission that it owed Mountain rural payment for the undisputed facilities charges and the undisputed traffic-sensitive charges referenced in Request Nos. 3 and 4?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 7: With respect to the facilities charges, please refer to the foregoing responses to Supplemental Data Request No. 2 and No. 5 above. With respect to traffic-sensitive charges from May 25, 2006 through August 24, 2006, Windstream did not notify the Commission when Windstream received, verified, or paid the three respective invoices, as it is not Windstream's common practice to involve the Commission in regular billing activities.

8. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 8:** Why did Windstream decide to pay the undisputed charges referenced in Request Nos. 3 and 4 on September 19, 2006, five days after Mountain Rural served its data requests, and one week before Windstream's responses were due?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 8: Windstream's payment on September 19, 2006 occurred within one week of the parties' latest attempt to reach an amicable settlement of all charges. Specifically, Windstream and Mountain Rural continued to exchange settlement communications on September 11 and 12, 2006. On September 12, 2006, the Windstream parties responsible for paying the invoices and negotiating the potential settlement of all charges became aware that Windstream's attempt to fully resolve all outstanding charges between the parties failed. Windstream's payment occurred thereafter.

9. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 9:** Prior to September 19, 2006, when did Windstream last pay Mountain Rural for undisputed facilities charges?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 9: Please refer to responses to Supplemental Requests No. 2, 5, and 8 above.

10. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 10:** Prior to September 19, 2006, when did Windstream last pay Mountain Rural for undisputed traffic-sensitive charges?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 10: In May 2006, as previously set forth in Paragraph 2 of Windstream's Motion to Dismiss, for Discovery, and for Injunctive Relief and Answer.

11. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 11**: Please identify all carrier traffic Windstream delivers on its access trunks from its Morehead tandem to the Mountain Rural West Liberty tandem.

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 11: As an initial matter, Windstream does not understand what Mountain Rural means by the term "access trunks" as that term typically refers to interexchange carrier trunks, and the facilities between Mountain Rural and Windstream are LEC to LEC facilities. With respect to the facilities between these parties, prior to December 2005, traffic was commingled and included BellSouth traffic, Windstream traffic, wireless carrier traffic, CLEC traffic, and traffic of Mountain Rural end users that subscribed to BellSouth to carry those end users' 1+ traffic. After December 2005, the intertoll, intraLATA facilities have been repurposed now to carry Windstream traffic and may also carry wireless and CLEC traffic. The facilities do not carry the traffic of those end users who are picked to an interexchange carrier for their intraLATA toll.

12. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 12:** In Windstream Response No. 2 to Mountain Rural's First Set of Data Requests, Windstream stated, "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."

A. When did Windstream first dispute the circuit billings for months prior to December, 2005?

B. Provide any documents or correspondence evidencing when Windstream first disputed the billings.

C. Provide any and all documentation that supports Windstream's contention that prior to December, 2005 the trunks were provided in accordance with a Meet Point arrangement and not subject to tariffed rates.

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 12: (A.) Not applicable - During the months prior to December 2005, Windstream received no invoices from Mountain Rural for facilities charges. (B) Not applicable - See the answer in (A) above. Additionally, as a result of the summary information provided during the course of this proceeding, Windstream notified Mountain Rural in September of 2006 that facilities charges prior to December 2005 were inappropriate. (C) Windstream is unaware of any such documentation since Windstream was responsible for its facility costs on its side of the Meet Point and did not submit facility invoices to BellSouth or Mountain Rural for their use of those facilities during the time that the facilities were used for commingled traffic. Similarly, Windstream is unaware of any separate facility invoices received during that time from BellSouth or Mountain Rural for Windstream's use of the facilities on their side of the Meet Point.

13. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 13:** When did Windstream first dispute charges for circuits billed for December, 2005? Provide any and all documents or correspondence evidencing when Windstream disputed the circuits.

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 13: Please refer to Supplemental Requests No. 2, 5, 8, and 9.

14. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 14:** When did Windstream first receive notice of what Windstream characterizes as the "removal of non-Windstream traffic from the Meet Point currently provisioned trunk rates"?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 14: Windstream did not use the language quoted above. With respect to Windstream's reference in its response to Request No. 2 ("removal of non-Windstream traffic from the Meet Point Jointly Provisioned trunk groups"), on September 9, 2006, Mountain Rural generally advised that, "BellSouth has *indicated that they intend* to migrate all Bell-responsibility traffic heading to Mountain Rural off the AllTel tandem and onto BellSouth tandems. Unless Bell reverses themselves from this morning's call, that means that after mid-September Bell will no longer have any traffic over the Mountain / Owensboro route that existst today." [Emphasis supplied.] Windstream could not resize the facilities until both the Mountain Rural and BellSouth traffic had in fact been removed so that Windstream could determine the appropriate facilities required. Mountain Rural did not provide notice of the removal of such traffic. However, Windstream determined internally that the Mountain Rural traffic was removed on November 23, 2005 and that the BellSouth traffic had been removed on November 28, 2005. Thereafter, Windstream placed an order with Mountain Rural for reduced facilities on December 5, 2005 after which the parties resized the facilities on December 12, 2005.

15. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 15:** Prior to November 2005, did Windstream have the ability to monitor traffic over the access trunks between Windstream's tandem and Mountain Rural?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 15: Again, Windstream objects to and is confused by the use of the term "access trunk" to the facts of this proceeding. With respect to the facilities at issue between Windstream and Mountain Rural, Windstream had the technical ability to view the "in" and "out" usage volumes but not to determine the owner of the traffic.

16. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 16:** When did Windstream issue an order or otherwise request Mountain rural to reduce the size of the access trunks between the parties? Provide documentation of that order or request.

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 16: Please see the response to Supplemental Request No. 14. See also Exhibit B attached hereto.

Exhibit B

From: Wells, Jamey A
Sent: Monday, December 05, 2005 10:37 AM
To: 'mrtco@mrtc.com'
Subject: Morehead Tandem Disconnect

Hi Richard,

I have placed order D699803 in our system to disconnect 6 T1s from the trunk group between MRTC and our Morehead Tandem as you and I discussed earlier. The order is due on December 12. This will leave 2 T1s in service on the group. The contact number for our central office is 606-784-2001 and anyone should be able to help you. Please let me know if you have other questions.

Thanks,

Jamey Wells
Network Performance-Wireline
Engineer 1
(704) 845-7437

TRUNK CIRCUIT ORDER

Report Date: 10/18/06

ORDER #: D699803 ACT: D QTY: 0 WOT: 12/12/05 PTD: D

TRUNK GROUP NAME/DESCRIPTION:

TRUNK GROUP: DF45ITIAL MRHDKYXA02T/77.WLBTXYXA01T TSC: GN037793

CCNA: PON: REQUEST DATE: 12/05/05 ASR NO:

LEC: RORD: DESIRED DUE DATE: 12/12/05 PROJID:

ACNA: CKR: F45ITIAL MRHDKYXA02T/77/WLBTXYXA01T

POINT CODE A: 234136040 (CSPC) POINT CODE Z: 005002123 (ECSPC)

MCO:

OCO:

CLO:

Work Description:

Disconnect 144 trunks:6 T1's due to underutilization. Take out trunks 49-192 on trkg 1218
Contact at MRTC is Richard Fraley 606-743-3121 MRHDKYXA02T/77 WLBTXYXA01T

17. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 17:** When were the access trunks resized?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 17: December 12, 2005 as noted above in response to Supplemental Request No. 14 and Exhibit B.

18. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 18:** When did Windstream dispute interstate usage prior to September 22, 2006? Please provide all documents or correspondence that evidences that dispute.

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 18: The disputes were already provided in Attachment A to Windstream's response to Request No. 1.

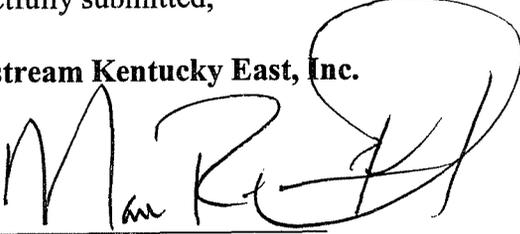
19. **MOUNTAIN RURAL SUPPLEMENTAL REQUEST NO. 19:** When did Windstream dispute interLATA usage prior to September 22, 2006? Please provide all documents or correspondence that evidences that dispute?

WINDSTREAM SUPPLEMENTAL RESPONSE NO. 19: The disputes were already provided in Attachment A to Windstream's response to Request No. 1.

Dated this 19th day of October, 2006.

Respectfully submitted,

Windstream Kentucky East, Inc.

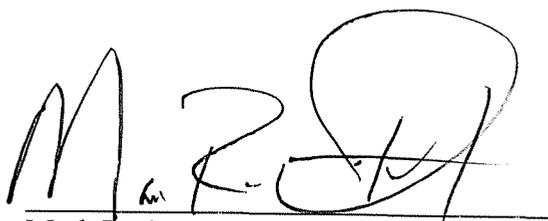
By: 

Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
(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 19th day of October, 2006 upon:

John E. Selent
Holly C. Wallace
Edward T. Depp
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
e-mail: selent@dinslaw.com



Mark R. Overstreet

KE242:00KE5:14838:1:FRANKFORT