



AT&T Kentucky
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July 2, 2008

RECEIVED

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PUBLIC SERVICE
COMMISSION

VIA FEDERAL EXPRESS

Ms. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: South Central Telcom LLC, Complainant v. BellSouth
Telecommunications, Inc., Defendant
PSC 2006-00448

Dear Ms. Stumbo:

Enclosed for filing in the above-captioned case are the original and six (6) copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's Responses to South Central Telcom's Supplemental Data Requests.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

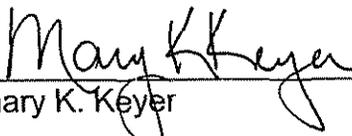
cc: Party of Record

715007

CERTIFICATE OF SERVICE FOR 2006-00448

It is hereby certified that a true and correct copy of the foregoing was served on the following individual by mailing a copy thereof on the 2nd day of July, 2008.

John E. Selent
Dinsmore & Shohl LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202



Mary K. Keyer

REQUEST: Identify and produce all documents, specifically including but not limited to agreements, letters, and e-mails, by which AT&T believes it has the authority to utilize switched access facilities to deliver any traffic other than toll traffic to South Central Telcom.

RESPONSE: The traffic other than AT&T-originated traffic that AT&T Kentucky delivers to South Central Telcom is transit traffic originated by third parties and destined for South Central Telcom end users. Because the parties have not negotiated an agreement, it is not clear whether AT&T-originated traffic is toll traffic for intercarrier compensation purposes.

Not only does AT&T Kentucky have authority to deliver transit traffic to South Central Telcom, pursuant to the Kentucky Public Service Commission's Order in Case No. 2004-00044, AT&T Kentucky is obligated to deliver transit traffic. In addition, as set forth in its initial responses, when South Central Telcom arranged for inclusion of the South Central Telcom NPA/NXXs in the Telcordia® Local Exchange Routing Guide ("LERG"), South Central Telcom provided notification to all carriers to route traffic to South Central Telcom in accordance with the routing information provided by South Central Telcom in the LERG.

Despite efforts by AT&T Kentucky to enter into a traffic exchange agreement with South Central Telcom, South Central Telcom consistently declined to enter into such an agreement. However, South Central Telcom has acquiesced in delivery of transit traffic to it. South Central Telcom has actual notice of transit traffic delivered to it by AT&T Kentucky via the Exchange Message Interface ("EMI") records provided by AT&T Kentucky to South Central Telcom. In fact, South Central Telcom admits that it backs CMRS-originated traffic out of bills sent to AT&T Kentucky.

If South Central Telcom wants AT&T Kentucky to deliver calls directed to South Central Telcom end users in a different manner, South Central Telcom should change its routing assignments in the LERG.

AT&T Kentucky
KY PSC Docket No. 2006-00448
South Central Telcom, LLC's Supplemental Data Requests
Received Date: June 26, 2008
Supplemental Item No. 1
Page 2 of 2

Documents responsive to this request regarding AT&T Kentucky's attempt to negotiate an agreement were produced in conjunction with initial data requests. With respect to the EMI records sent from AT&T Kentucky to South Central Telcom, South Central Telcom should have copies of such records.

REQUEST: Identify and produce all documents, specifically including but not limited to agreements, letters, e-mails, by which AT&T has agreed to deliver any traffic other than toll traffic to South Central Telcom.

RESPONSE: See response to Supplemental Data Request 1.

REQUEST: Admit or deny that AT&T did not seek South Central Telcom's advance permission to implement any agreement(s) or other arrangement(s) identified in response to Supplemental Data Request No.2, above. If you deny this statement, please fully explain your reason for doing so, and identify all evidence (whether documentary or not) that supports or is otherwise related to the basis of your denial.

RESPONSE: Deny. AT&T Kentucky sought a traffic exchange agreement with South Central Telcom. Despite efforts by AT&T Kentucky to enter into a traffic exchange agreement with South Central Telcom, South Central Telcom consistently declined to enter into such an agreement.

Moreover, pursuant to the Kentucky Public Service Commission's Order in Docket No. 2004-00044, AT&T Kentucky is obligated to deliver transit traffic. Also, when South Central Telcom arranged for inclusion of the South Central Telcom NPA/NXXs in the LERG, South Central Telcom provided notification to all carriers to route traffic to South Central Telcom in accordance with the routing information in the LERG.

South Central Telcom has acquiesced in delivery of transit traffic to it. First, South Central Telcom has actual notice of transit traffic delivered to it by AT&T Kentucky via the EMI records provided by AT&T Kentucky to South Central Telcom. In fact, South Central Telcom admits that it backs CMRS-originated traffic out of bills sent to AT&T Kentucky.

Please see Supplemental Data Request Response No. 1 regarding responsive documents.

REQUEST: Admit or deny that AT&T has not, at any time, secured South Central Telcom's permission to implement any agreement(s) or other arrangement(s) identified in response to Supplemental Data Request No. 2, above. If you deny this statement, please fully explain your reason for doing so, and identify all evidence (whether documentary or not) that supports or is otherwise related to the basis of your denial.

RESPONSE: Deny. See response to Supplemental Data Request 3.

REQUEST: Admit or deny that, when AT&T delivers traffic to South Central Telcom, it is obligated to compensate South Central Telcom. If you deny this statement, please fully explain your reason for doing so, and identify all evidence (whether documentary or not) that supports or is otherwise related to the basis of your denial.

RESPONSE: Deny. For the third party traffic for which AT&T Kentucky acts as a transit provider, AT&T Kentucky is not obligated to compensate South Central Telcom. AT&T Kentucky provides South Central Telcom with industry standard call records for the transit traffic. It is then incumbent on South Central Telcom to use the call records to invoice the originating carrier.

AT&T Kentucky agrees that it should compensate South Central Telcom for terminating AT&T-originated traffic. That is a key reason that AT&T Kentucky has sought an agreement with South Central Telcom. Because South Central Telcom has declined to execute an agreement, however, there is no arrangement pursuant to which AT&T Kentucky can pay South Central Telcom. South Central Telcom's switched access tariff is not applicable to AT&T Kentucky because the tariff only offers facilities for purchase - facilities that AT&T Kentucky has not ordered or used - because it routes traffic destined for South Central Telcom via South Central Rural Telephone Cooperative, in accordance with routing information provided in the LERG.

REQUEST: If you admit Supplemental Data Request No. 5, please identify rate of compensation that AT&T is obligated to pay. If you do not know the specific rate, please fully explain why you do not know the specific rate, and describe how what you believe is an appropriate rate should be determined.

RESPONSE: Because AT&T Kentucky denied Supplemental Data Request 5, no response is necessary. By way of further response, AT&T Kentucky refers South Central Telcom to the proposed agreement attached to its initial data responses.

REQUEST: Other than CMRS traffic, state whether AT&T is using toll units to send South Central Telcom any traffic that AT&T believes should not be billed as toll traffic? If AT&T is sending any such traffic, identify all such traffic, identify the date(s) upon which AT&T began sending such traffic, and produce any documents relating to or otherwise supporting your response.

RESPONSE: When South Central Telcom arranged for inclusion of the South Central Telcom NPA/NXXs in the LERG, South Central Telcom provided notification to all carriers to route traffic to South Central Telcom using the routing information provided in the LERG.

AT&T Kentucky should not be billed for transit traffic – CMRS-, ICO- or CLEC-originated traffic that AT&T Kentucky delivers to South Central Telcom. In addition, AT&T Kentucky should not be billed for AT&T-originated traffic out of South Central Telcom's switched access tariff, because the tariff is not applicable to AT&T Kentucky's delivery of the traffic. Absent an agreement setting forth an intercarrier compensation mechanism, the parties cannot exchange compensation.

REQUEST: AT&T Supplemental Data Request Nos. 18, 19, and 21 use the term "toll." Please provide AT&T definition of the word "toll" as used in those request.

RESPONSE: Without a negotiated agreement that defines the nature of traffic for intercarrier compensation purposes, AT&T Kentucky has defaulted to its end-user tariff definition for toll.