



AT&T Kentucky
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May 30, 2008

RECEIVED

MAY 30 2008

PUBLIC SERVICE
COMMISSION

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 ten (10) copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's First Data Requests to South Central Telcom, LLC.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

cc: Parties of Record

712365

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

MAY 30 2008

SOUTH CENTRAL TELCOM, LLC)
)
COMPLAINANT)
)
V.)
)
BELLSOUTH TELECOMMUNICATIONS, INC.)
)
DEFENDANT)

PUBLIC SERVICE
COMMISSION

CASE NO. 2006-00448

BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T KENTUCKY'S FIRST DATA REQUESTS
TO SOUTH CENTRAL TELCOM, LLC

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to the Order of the Kentucky Public Service Commission dated May 21, 2008, hereby serves its First Data Requests numbered 1 – 17 to South Central Telcom, LLC ("South Central Telcom").

INSTRUCTIONS

(a) If any response required by way of answer to these Data Requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion. If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(b) These Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(c) If a Data Request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Data Request, answer all parts of the Data Request to which you do not object, and as to each part to which you object, separately set forth the specific basis for the objection.

(d) These Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Data Requests subsequently become known or should your initial response be incorrect or untrue.

(e) For each Data Request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DEFINITIONS

(a) "South Central Telcom" means, unless otherwise indicated, South Central Telcom, LLC, the competitive local exchange carrier, any predecessors in interest, its parents, subsidiaries, and affiliates, its present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of South Central Telcom.

(b) "AT&T Kentucky" means BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky.

(c) "You" and "your" refer to South Central Telcom.

(d) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(e) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(f) The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of South Central Telcom, including, but not limited to, correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail ("Email") files, and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

(g) The phrases "refer to" and "relate to" mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any

way, or in any way logically or factually connected or associated with the matter discussed.

DATA REQUESTS

1. Does South Central Telcom admit that AT&T Kentucky is not an interexchange carrier? If not, provide in detail the basis for your response and produce any and all documents that support it.
2. How much does South Central Telcom claim AT&T Kentucky has failed to pay in access charges pursuant to South Central Telcom's switched access tariffs? Produce any and all documents that support your claim.
3. List and describe in detail the types of traffic that South Central Telcom claims are subject to access charges under South Central Telcom's switched access tariffs at issue in this case.
4. Does South Central Telcom agree that transit traffic (in this case, traffic not originated by AT&T Kentucky) is not the type of traffic subject to access charges under South Central Telcom's switched access tariffs? If no, explain in detail the basis for your response and produce any and all documents that support it.
5. Does South Central Telcom agree that wireless calls originating and terminating within the same local MTA are "local" calls governed by reciprocal compensation arrangements under Sections 251 and 252 of the Telecommunications Act of 1996 and that South Central Telcom's switched access tariff does not apply to such traffic? If not, explain in detail the basis for your response and produce any and all documents that support it.
6. To what type of carriers does South Central Telcom's PSC KY Tariff No. 2 ("switched access tariff") on file with the Kentucky Public Service Commission apply?
7. How does South Central Telcom determine the jurisdiction of the traffic for which it bills AT&T Kentucky under its switched access tariffs? Produce any and all documents relevant to this determination.
8. Explain in detail what types of traffic are included in South Central Telcom's access charge claim against AT&T Kentucky and produce any and all documents that support your explanation.
9. Is transit traffic (traffic not originated by AT&T Kentucky) included in the amount of access charges you allege AT&T Kentucky owes South Central Telcom? If so, how much of the charges are for transit traffic? Produce any and all documents that support your response.

10. If your response to Data Request 9 is "no," what process does South Central Telcom use to exclude transit traffic (traffic not originated by AT&T Kentucky) from its billing to AT&T Kentucky? Provide any and all documents relevant to this process.
11. Does South Central Telcom allege that AT&T Kentucky ordered switched access facilities or services from South Central Telcom's tariffs? If so, produce any and all orders, service orders, access service requests or other such documentation wherein AT&T Kentucky placed an order with South Central Telcom for such access services.
12. If your response to Data Request 11 is "no," explain in detail South Central Telcom's basis for billing AT&T Kentucky access charges pursuant to South Central Telcom's switched access tariff rates. Provide any and all documents that support your basis.
13. Does South Central Telcom accept, or has it accepted, orders from other carriers to purchase facilities or services for access from South Central Telcom pursuant to its switched access tariffs?
14. If your answer to Data Request 13 is yes, what types of carriers have purchased facilities or services, and does South Central Telcom bill, or has South Central Telcom billed, those carriers?
15. Does South Central Telcom own a switch? If so, where? If not, what switch does South Central Telcom use to send and receive traffic?
16. Does South Central Telcom have an agreement with South Central Rural Telephone Cooperative, the incumbent local exchange carrier? If so, describe what type of agreement it is and provide a copy.
17. On what basis does South Central Telcom take the position that an interconnection agreement is not required for interconnection between a Competitive Local Exchange Carrier and an Incumbent Local Exchange Carrier for the exchange of traffic? State specific references to any regulatory orders, laws or documents that support your claim.

Respectfully submitted,


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COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.,
D/B/A AT&T KENTUCKY

712343

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 30th day of May, 2008.

John E. Selent
Edward T. Depp
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