



John Selent
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PUBLIC SERVICE
COMMISSION

June 25, 2008

VIA FEDERAL EXPRESS

Hon. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

***Re: In the Matter of: South Central Telcom LLC v. BellSouth
Telecommunications, Inc., Case No. 2006-00448.***

Dear Ms. Stumbo:

We are enclosing one original and eleven (11) copies of South Central Telcom LLC's Supplemental Data Requests to BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky for filing with the Public Service Commission of the Commonwealth of Kentucky. Please file-stamp one copy and return it to us in the enclosed self-addressed stamped envelope.

Thank you, and if you have any questions, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

John E. Selent

JES/lb

Enclosure

cc: Edward T. Depp, Esq.

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JUN 26 2008

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTH CENTRAL TELCOM LLC)	
Complainant)	
)	
v.)	Case No. 2006-00448
)	
BELLSOUTH TELECOMMUNICATIONS,)	
INC.)	
Defendant)	
)	

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

South Central Telcom LLC ("South Central"), by counsel, and pursuant to the May 21, 2008 procedural order entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter, hereby propounds the following supplemental data requests upon BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T"). These supplemental data requests shall be answered in accordance with the Commission's Order of May 21, 2008.

SUPPLEMENTAL DATA REQUEST NO. 1: 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:

SUPPLEMENTAL DATA REQUEST NO. 2: Identify and produce all documents, specifically including but not limited to agreements, letters, and e-mails, by which AT&T has agreed to deliver any traffic other than toll traffic to South Central Telcom.

RESPONSE:

SUPPLEMENTAL DATA REQUEST NO. 3: 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:

SUPPLEMENTAL DATA REQUEST NO. 4: 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:

SUPPLEMENTAL DATA REQUEST NO. 5: 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:

SUPPLEMENTAL DATA REQUEST NO. 6: If you admit Supplemental Data Request No. 5, please identify the specific 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:

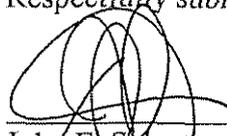
SUPPLEMENTAL DATA REQUEST NO. 7: Other than CMRS traffic, state whether AT&T is using toll trunks to send South Central Telcom any traffic that AT&T believes should not be billed as toll traffic? If AT&T is sending any such traffic, identify all such traffic, identify the date(s) upon which AT&T began sending such traffic, and produce any documents relating to or otherwise supporting your response.

RESPONSE:

SUPPLEMENTAL DATA REQUEST NO. 8: AT&T Supplemental Data Request Nos. 18, 19, and 21 use the term "toll." Please provide AT&T's definition of the word "toll" as used in those requests.

RESPONSE:

Respectfully submitted,



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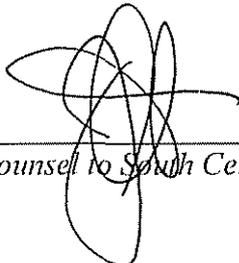
Counsel to South Central Telcom LLC

CERTIFICATE OF SERVICE

I hereby certify a true and accurate copy of the foregoing was served, by first-class United States mail, sufficient postage prepaid, on the following individuals this 25th day of June, 2008:

Mary K. Keyer
General Counsel/Kentucky
601 W. Chestnut Street
P.O. Box 32410
Louisville, KY 40232
Counsel for BellSouth Telecommunications, Inc.

Lisa Foshee, Esq.
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Counsel to South Central Telcom LLC