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Via E-Mail and United States Mail

February 8, 2007

Douglas F. Brent Stoll Keenon Ogden PLLC 500 West Jefferson Street, Suite 2000 PNC Plaza Louisville, KY 40202-2874

Re: P.S.C. Case No. 2006-00532

Dear Doug:

As you requested I asked Windstream to review its policy regarding notice to certain wholesale customers regarding major outages. Your client (T-Mobile) requested the policy be expanded to include all carriers who order facilities from Windstream. For the reasons I previously outlined in my email, Windstream respectfully declines T-Mobile's request.

Specifically, in my February 2, 2007 e-mail, I explained that Windstream cannot expand its wholesale notification policy to include all carriers who may order facilities (*e.g.*, special access) since such expansion is not practical and overly burdensome. <u>Windstream's policy is</u> <u>intended to notify those carriers who own equipment that is collocated in its offices and,</u> <u>therefore, who would have a need to respond to the notice to make any associated repairs to their</u> <u>own equipment</u>. Windstream's notice, however, is not intended to reach every carrier who merely <u>leases</u> equipment from Windstream. In such instances, the leasing carriers have no repair obligations. Additionally, there is no readily available means to identify every such carrier (including appropriate contact notification information) that orders circuits out of Windstream's tariff or the end offices to which they may be connected. In fact, even developing and maintaining updates to such a list would be highly impractical, and in the case of a major outages (which Windstream's notice is intended to address), Windstream's resources are better spent responding to the outage and notifying those carriers with collocated equipment that may need to perform equipment repair.

In sum, the purpose of Windstream's notice is to reach those carriers who collocate in its offices because they <u>own</u> equipment located there and are responsible for the associated repairs. T-Mobile's request is just not practical and exceeds the purpose of Windstream's notification policy. In fact, T-Mobile's request would expand Windstream's notification obligation to include practically any long distance carrier in the U.S. that may be sending a long distance call to a

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Windstream customer. T-Mobile should understand these practicality concerns. Windstream believes that wireless providers like T-Mobile do not provide notice to all carriers whose calling potentially may be interrupted in the event of a network outage. In fact, it is Windstream's experience that wireless providers generally may encounter more network congestion and a greater likelihood of network outages than wireline carriers.

Therefore, for the reasons set forth above and our prior communications, Windstream's notification policy is reasonable and effectively targets those carriers who need to respond in such major outages in order to may necessary equipment repairs. I am filing a copy of this letter with the Commission in light of your email pertaining to T-Mobile's anticipated filing on February 9, 2007.

yours Mark R. C versfree

cc: Beth O'Donnell Dennis G. Howard II

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