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March 6, 2007

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MAR 07 2007

PUBLIC SERVICE
COMMISSION

Via Federal Express

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: *In the Matter of: BellSouth Telecommunications, Inc. v. Brandenburg Telephone Company, Case No. 2006-00546*

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Brandenburg Telephone Company's Responses to BellSouth Telecommunications' Data Requests. Please return a file-stamped copy in the self-addressed, postage prepaid envelope furnished herewith.

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

Sincerely,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk
Enclosures

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 07 2007

PUBLIC SERVICE
COMMISSION

In the Matter of:

BELLSOUTH TELECOMMUNICATIONS, INC.)
)
COMPLAINANT)
)
v.) CASE NO. 2006-00546
)
BRANDENBURG TELEPHONE COMPANY)
)
DEFENDANT)

RESPONSES TO BELLSOUTH TELECOMMUNICATIONS' DATA REQUESTS

Brandenburg Telephone Company ("Brandenburg"), by counsel, and pursuant to the January 24, 2007 Order of the Public Service Commission of the Commonwealth of Kentucky ("the Commission"), hereby responds to the data requests of BellSouth Telecommunications, Inc. ("BellSouth").

REQUEST NO. 1: Do you contend that the ACS traffic at issue in this case was being routed during the Relevant Period over any trunk group, including EAS trunk groups, other than the Common Transport Trunk Group ("CTTG")? If not, please state so in your response.

RESPONSE: As Brandenburg stated in its Answer, Brandenburg is without information sufficient to ascertain how BellSouth routed ACS traffic to Brandenburg during the Relevant Period. ACS traffic is indistinguishable from other intraLATA toll traffic routed over the CTTG. Therefore, Brandenburg does not know whether BellSouth routed ACS traffic over the CTTG or over other trunk groups during the Relevant Period.

REQUEST NO. 2: Do you contend that BellSouth did not pay Brandenburg the full amounts due, other than amounts pertaining to disputes unrelated to the issues in this case, on the SN-642-NET

statements between BellSouth and Brandenburg during the Relevant Period? If so, please identify and provide any and all documentation that supports that contention. If not, please state so in your response.

RESPONSE: To the extent that Brandenburg was able to bill traffic delivered over the intra-LATA toll groups (“CTTG”) during the Relevant Period, Brandenburg’s records indicate that BellSouth does not have an outstanding balance for amounts pertaining to the disputes related to the issues in this case. However, given Brandenburg has no way of verifying whether BellSouth actually routed the ACS traffic over the intra-LATA toll groups, or over other trunk groups such as the EAS trunk groups, Brandenburg is without information sufficient to determine whether it has been fully and fairly compensated by BellSouth for terminating ACS traffic during the Relevant Period.

Respectfully submitted,



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Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

6th I hereby certify a true and accurate copy of the foregoing was served on the following this day of March, 2007:

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Counsel for BellSouth Telecommunications, Inc.

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Counsel for BellSouth Telecommunications, Inc.



Counsel to Brandenburg Telephone
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