

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC)
DISPUTE BETWEEN WINDSTREAM)
KENTUCKY EAST, LLC, BRANDENBURG) CASE NO. 2008-00203
TELEPHONE COMPANY AND MCIMETRO)
ACCESS TRANSMISSION SERVICES, LLC)
d/b/a VERIZON ACCESS)

**MCIMETRO'S SUPPLEMENTAL REQUESTS FOR INFORMATION
TO WINDSTREAM KENTUCKY EAST LLC**

MCImetro Access Transmission Services, LLC d/b/a Verizon Access
("MCImetro") propounds the following requests for information to Windstream
Kentucky East LLC ("Windstream").

INSTRUCTIONS

Each response shall be answered under oath or be accompanied by a signed
certification of the preparer or person supervising the preparation of the response on
behalf of the entity that the response is true and accurate to the best of that person's
knowledge, information, and belief formed after a reasonable inquiry.

The respondent shall make timely amendment to any prior responses if it obtains
information which indicates that the response was incorrect when made or, though
correct when made, is now incorrect in any material respect. For any requests to which
the respondent fails or refuses to furnish all or part of the requested information,
respondent shall provide a written explanation of the specific grounds for their failure to
completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

INTERROGATORIES

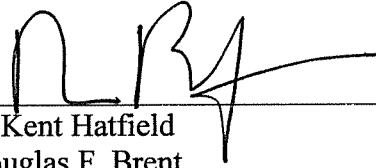
15. Does Windstream assert any claim against MCImetro in this proceeding? If so, please state each such claim.
16. With respect to each claim stated in response to Interrogatory No. 15:
 - a. If the claim is based on one or more tariff provisions, please identify each such provision, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.
 - b. If the claim is based on one or more statutory provisions, please identify each such provision, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.
 - c. If the claim is based on one or more FCC or Commission rules or regulations, please identify each such rule or regulation, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.
 - d. If the claim is based on one or more FCC or Commission orders, please identify each such order, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.
 - e. If the claim is based on one or more contractual provisions, please identify each such provision, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.
 - f. If the claim is based on any other legal theory, please identify each such theory, the basis for Windstream's claim that it requires MCImetro to pay Windstream, the amount claimed, and how that amount was calculated.

17. Please identify any bills Windstream has sent MCImetro relating to the traffic at issue in this proceeding.
18. Does Windstream contend that MCImetro must reimburse Brandenburg Telephone Company (“Brandenburg”) for any amounts that Brandenburg is ordered to pay Windstream? If so:
 - a. If this contention is based on one or more tariff provisions, please identify each such provision, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.
 - b. If this contention is based on one or more statutory provisions, please identify each such provision, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.
 - c. If this contention is based on one or more FCC or Commission rules or regulations, please identify each such rule or regulation, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.
 - d. If this contention is based on one or more FCC or Commission orders, please identify each such order, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.
 - e. If this contention is based on one or more contractual provisions, please identify each such provision, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.
 - f. If this contention is based on any other legal theory, please identify each such theory, the basis for Windstream’s claim that it requires MCImetro to pay Brandenburg, the amount Windstream asserts MCImetro should be required to pay, and how that amount was calculated.

DOCUMENT REQUESTS

1. Please produce all documents supporting or otherwise relating to Windstream's response to Interrogatory No. 16.
2. Please produce all documents supporting or otherwise relating to Windstream's response to Interrogatory No. 17.
3. Please produce all documents supporting or otherwise relating to Windstream's response to Interrogatory No. 18.

Respectfully submitted,



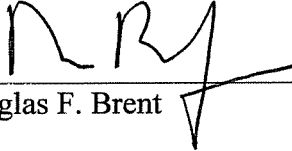
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing requests has been served by first class mail on those persons whose names appear below this 16th day of March, 2010.

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