



S T O L L · K E E N O N · O G D E N
P L L C

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099
www.skofirm.com

DOUGLAS F. BRENT
DIRECT DIAL: 502-568-5734
douglas.brent@skofirm.com

July 17, 2008

RECEIVED

JUL 21 2008

PUBLIC SERVICE
COMMISSION

Ms. Stephanie L. Stumbo
Executive Director
Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

**RE: Investigation into Traffic Dispute between Windstream Kentucky East
Brandenburg Telephone Company and. MCI metro Access Transmission
Services, LLC and, Inc.**
Case No. 2008-00203

Dear Ms. Stumbo:

Enclosed please find an original and ten copies of MCI metro Access Transmission Services, LLC's Information Requests to Brandenburg Telephone Company and Windstream Kentucky East LLC. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me in the prepaid envelope.

Sincerely yours,

Douglas F. Brent

DFB:ec
Enclosures
cc: Parties of Record

105138.116493/533555.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 21 2008

In the Matter of:

PUBLIC SERVICE
COMMISSION

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 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.

1. Does Windstream contend that its Kentucky "Transit Traffic Service" tariff (S11.1 of Windstream Kentucky East P.S.C. KY No. 7) applies to any traffic originated by Brandenburg Telephone Company in Radcliff, Kentucky and routed to Windstream's network in Elizabethtown, Kentucky? If the answer is other than affirmative, please explain.
2. Has Windstream billed Brandenburg Telephone Company under its "Transit Traffic Service" tariff (S11.1 of Windstream Kentucky East P.S.C. KY No. 7)?
3. With reference to the March 27, 2007, 3:24 p.m. email from Steven Williams of Windstream to Randall Bradley of Brandenburg Telephone Company (*see* Exhibit 3 to Brandenburg Telephone Company's Complaint in Case No. 2008-00239), please describe the traffic terminating to Brandenburg Telephone Company that Windstream sends via BellSouth due to lack of a direct connection to its tandem.
4. Please provide a copy of any agreements between Windstream and Brandenburg Telephone Company governing any exchange of traffic on trunk groups GN056322 and GN056191.
5. For each agreement identified in response to Request No. 4, please state whether the agreement has been filed with the Public Service Commission of Kentucky ("PSC") and whether the PSC approved the agreement, indicate the date of any such approval, and provide a copy of any Commission order or correspondence evidencing its acceptance or approval of the agreement.
6. Please identify any telecommunications transmission facilities owned, operated or controlled by Brandenburg Telephone Company, or any affiliate, that connect with Windstream in Hardin County Kentucky.
7. For each facility identified in response to Request No. 6, please specify the location where each such connection occurs.
8. Please explain the benefits of Windstream's February 21, 2007 proposal to George Lewis of Brandenburg Telephone Company (*see* Exhibit 3 to Brandenburg Telephone Company's Complaint in Case No. 2008-00239) to establish a trunk group from Brandenburg Telephone Company to Windstream's Elizabethtown tandem, and explain Windstream's proposal that existing T-1's be "removed" or "move[d]" to effect this proposal.

9. With reference to the audit of traffic and traffic study described in Windstream's March 16, 2007 proposal to Randall Bradley of Brandenburg Telephone Company (*see* Exhibit 3 to Brandenburg Telephone Company's Complaint in Case No. 2008-00239), please explain Windstream's assertion that "no additional facilities" would be required to establish a tandem trunk group between Windstream and Brandenburg Telephone Company. In addition, describe the process that would allow this trunk group to be established "in a matter of minutes."
10. For (7-digit dialed) calls from Windstream customers in Elizabethtown to 270-769-3330, does Windstream route these calls to EZTWKYXA, an MCI metro point of interconnection with Windstream at 111 S. Main in Elizabethtown?
11. If the answer to Request No. 10 is no, please explain how Windstream routes this traffic.
12. For (7-digit dialed) calls from Brandenburg Telecom LLC customers in Elizabethtown to 270-769-3330, do these calls transit Windstream's network?
13. If the answer to Request No. 12 is yes, does Windstream route these calls to EZTWKYXA, an MCI metro point of interconnection with Windstream at 111 S. Main in Elizabethtown?
14. If the answer to Request No. 13 is no, please explain how Windstream routes this traffic.

Respectfully submitted,



C. Kent Hatfield
Douglas F. Brent
STOLL KEENON OGDEN, PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Phone: (502) 333-6000
Fax: (502) 333-6099
douglas.brent@skofirm.com

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 17th day of July, 2008.

John E. Selent
Edward T. Depp
Holly C. Wallace
DINSMORE & SHOHL, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

Bruce F. Clark
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634

A handwritten signature in black ink, appearing to read 'D. Brent', is written over a horizontal line.

Douglas F. Brent