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COMMONWEALTH OF KENTUCKY

JUL 2 1 2008
PUBLIC SERVICE

COMMISSION

BEFORE THE PUBLIC SERVICE 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 REQUESTS FOR INFORMATION TO BRANDENBURG TELEPHONE COMPANY

MCImetro Access Transmission Services, LLC d/b/a Verizon Access ("MCImetro") propounds the following requests for information to Brandenburg Telephone Company.

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 Brandenburg Telephone Company terminate calls in Radcliff, Kentucky originating from subscribers of Brandenburg Telecom LLC in Elizabethtown, Kentucky?
- 2. If the answer to Request No. 1. is yes, please identify and provide a copy of any and all traffic exchange agreements or other agreements of any kind between Brandenburg Telephone Company and Brandenburg Telecom which relate to the traffic.
- 3. Does Brandenburg Telecom LLC terminate calls in Elizabethtown, Kentucky originating from subscribers of Brandenburg Telephone Company in Radcliff, Kentucky?
- 4. If the answer to Request No. 3 is yes, please identify and provide a copy of any and all traffic exchange agreements or other agreements of any kind between Brandenburg Telecom LLC and Brandenburg Telephone Company which relate to the traffic.
- 5. Does Brandenburg Telephone Company or any current affiliate, subsidiary, joint venture partner or other related entity provide dial-up Internet access in Kentucky?
- 6. If the answer to Request No. 5 is yes, please identify each dial-up access number used by Brandenburg Telephone Company which is outside of Windstream's exchange boundary and rated locally to Elizabethtown.
- 7. Please identify any telecommunications transmission facilities owned, controlled or operated by Brandenburg Telephone Company, or any affiliate, which connect with Windstream in Hardin County, Kentucky.
- 8. For any facilities identified in response to Request No. 7, identify the point of connection by CLLI code, if applicable, or otherwise, and describe the circuit capacity of the facility.
- 9. Please identify any telecommunications transmission facilities owned, controlled or operated by Brandenburg Telephone Company, or any affiliate, which connect with BellSouth Telecommunications, Inc.

- 10. For any facilities identified in response to Request No. 9, identify the point of connection by CLLI code, if applicable, or otherwise, and describe the circuit capacity of the facility.
- 11. Does Brandenburg Telephone Company provide intraLATA and interLATA services in Kentucky?
- 12. Does Brandenburg Telephone Company terminate intraLATA toll traffic to Windstream in Elizabethtown?
- 13. If the response to Request No. 12 is affirmative, please describe the facilities used to transport the traffic to the Windstream network, and identify by CLLI the point of connection.
- 14. Please provide a copy of any agreement governing the exchange of traffic from Radcliff and Elizabethtown between Brandenburg Telephone Company and any present or former incumbent carrier serving Elizabethtown.
- 15. Please identify the member or members of Brandenburg Telecom LLC.
- 16. Please provide a copy of any "operating agreement," as that term is used in KRS 275.015(20), for Brandenburg Telecom LLC.
- 17. For any agreements identified in response to Requests No. 2, 4, or 14, please state whether these agreements have been filed with the Public Service Commission of Kentucky ("PSC"), state whether the PSC approved any of such agreements, indicate the date of any such approval and provide a copy of or citation to any such Commission order or correspondence evidencing its acceptance or approval of each such agreement.

Respectfully submitted,

C. Kent Hatfield

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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 17th day of July, 2008.

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