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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC)
DISPUTE BETWEEN WINDSTREAM)
KENTUCKY EAST, LLC, BRANDENBURG)
TELEPHONE COMPANY AND MCIMETRO) Case No. 2008-00203
ACCESS TRANSMISSION SERVICES, LLC)
D/B/A/ VERIZON ACCESS)

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

Windstream Kentucky East, LLC ("Windstream") submits as follows in response to the Requests for Information served by MCIMetro Access Transmission Services, LLC d/b/a Verizon Access ("Verizon"). As used herein, Brandenburg Telephone Company is referred to as "Brandenburg".

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.

RESPONSE: Windstream states that its tariffs do not provide for any service which allows any carrier to utilize Windstream's network in a manner contrary to LERG routing protocols (*e.g.*, when Windstream's network is not on the call path); however, Windstream states that in the event Brandenburg were originating traffic for delivery to a carrier homed behind Windstream's network, then such tariff would be applicable.

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)?

RESPONSE: Yes. During the time that Windstream believed the traffic in question to be transit traffic, Windstream rendered invoices to Brandenburg under the tariffed tandem transit rate. Please refer also to Windstream's response to Commission Staff data request No. 1(b). No such invoices were paid.

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.

RESPONSE: Trunk Groups GN056191 and GN0563222, per Windstream's local tariff, are for the exchange of EAS traffic only between Windstream and Brandenburg ILEC for the rate centers of Radcliff and Vinegrove. In 2001 and 2002, these trunk groups were provisioned and put in service. Windstream customers cannot dial 1+ to Radcliff and Vinegrove. Further, Windstream customers who subscribe to a Local Calling Plan ("LCP") cannot dial 1+ toll for the rate centers of Brandenburg and North Garrett. Windstream customers, who do not subscribe to the LCP, must dial 1+ toll to reach Brandenburg and North Garrett. All other Brandenburg ILEC rate centers are dialed as 1+ toll by Windstream customers and routed by Windstream to AT&T's tandem in Louisville when the customer does not have an intra-LATA carrier code ("IPIC"). If the customer has an IPIC on his or her line, the call is routed to the carrier designated by the customer to carry the call.

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.

RESPONSE: Please see Windstream's attachment provided in response to
Commission Staff Data Request No. 4.

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.

RESPONSE: Any such Commission docket or approval information is publicly available to Verizon from the Commission's website or filing office.

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.

RESPONSE: Without waiving its objection that this request seeks information regarding facilities owned or controlled by an entity other than Windstream, Windstream states as follows to the best of its knowledge: as to Brandenburg ILEC: OCN 0398 RDCLKYXADS0 TSC GN056191 to EZTWKYXADS0 OCN 9690 and RDCLKYXADS0 TSC GN056322 to EZTWKYXADS0 OCN 9690; as to Brandenburg CLEC: OCN 5672 RDCLKYXAL1MD TSC GN078329 to EZTWKYXA05T and RDCLKYXAL1MD TSC GN078365 to EZTWKYXA05T.

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.

RESPONSE: Windstream's statement was advising Brandenburg that existing T1 facilities and DS0s could be disconnected from the existing trunk groups and reused for a Windstream proposed trunk group to its Elizabethtown Tandem. Accordingly, Windstream proposed to establish a trunk group from Brandenburg's Radcliff tandem to Windstream's Elizabethtown Tandem.

7. For each facility identified in response to Request No. 6, please specify the location where each such connection occurs.

RESPONSE: 111 S. Main Street, Elizabethtown, Kentucky

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."

RESPONSE: Please refer to the response to Data Request No. 8 above explaining why no additional facilities would be required to establish a tandem trunk group. Additionally, while trunks may be turned up in a matter of minutes, the total business process to establish a new trunk group between companies cannot be completed in a matter of minutes and instead involves input of the local order into Windstream's access services and provisioning database and a normal interval time of thirty (30) days.

10. For (7-digit dialed) calls from Windstream customers in Elizabethtown to 270-769-3300, does Windstream rout these calls to EXTWKYZA, an MCImetro point of interconnection with Windstream at 111 S. Main in Elizabethtown?

RESPONSE: No.

11. If the answer to Request No. 10 is no, please explain how Windstream routes this traffic.

RESPONSE: Windstream customers in its Elizabethtown rate center calling, for example, 270-769-3330 as a 7-digit call have dial tone originating at the EZTWKYXADS0 switch located at 111 S. Main Street in Elizabethtown, Kentucky. The call is routed to the Common Language Location Identifier ("CLLI") of LSVLKYAPWA6 point code 216-002-004 for Verizon. The terminating location for that call is 526 Armory Place, Louisville, Kentucky 40202-United States-Jefferson County. The Local Exchange Routing Guide ("LERG") 7 identifies the switch associated with 502554 as LSVLKY27X3X located in Louisville, Kentucky 40202 with V/H coordinates of 06527/02773.

12. For (7-digit dialed) calls from Brandenburg Telecom LLC customers in Elizabethtown to 270-769-3330, do these calls transit Windstream's network?

RESPONSE: Windstream cannot confirm how Brandenburg CLEC customers are required to dial this specified number 270-769-3330. Windstream believes that Brandenburg CLEC's traffic is being delivered by Brandenburg to Windstream also contrary to LERG routing protocols through Windstream's network for delivery to Verizon.

13. If the answer to Request No. 12 is yes, does Windstream route these calls to EZTWKYXA, an MCImetro point of interconnection with Windstream at 111 S. Main in Elizabethtown?

RESPONSE: No.

14. If the answer to Request No. 13 is no, please explain how Windstream routes this traffic.

RESPONSE: Brandenburg CLEC routes the 5025549921 LRN (associated in the LERG with AT&T's Louisville tandem) to Windstream's Elizabethtown Tandem EZTWKYXA05T. The Elizabethtown switch translations tables route the information to the Windstream direct trunk group to LSVLKYAPWA6 for Verizon.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served by first class mail on those persons whose names appear below this 31st day of July, 2008.

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