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March 20, 2009

RECEIVED

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PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: SouthEast Telephone, Inc., Complainant v. BellSouth
Telecommunications, Inc. d/b/a AT&T Kentucky, Defendant
KSPC 2008-00279

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's First Data Requests to SouthEast Telephone, Inc.

Sincerely,


Mary K. Keyer
General Counsel/Kentucky

cc: Parties of Record

Enclosures

731943

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTHEAST TELEPHONE, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2008-00279
)	
BELLSOUTH TELECOMMUNICATIONS, INC.,))	
D/B/A AT&T KENTUCKY)	
)	
DEFENDANT)	

BELLSOUTH TELECOMMUNICATIONS, INC.
D/B/A AT&T KENTUCKY'S FIRST DATA REQUESTS
TO SOUTHEAST TELEPHONE, INC.

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to the Order of the Kentucky Public Service Commission dated February 26, 2009, hereby serves its First Data Requests to SouthEast Telephone, Inc. ("SouthEast").

INSTRUCTIONS

(a) If any response required by way of answer to these Data Requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion. If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who

has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(b) These Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(c) If a Data Request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Data Request, answer all parts of the Data Request to which you do not object, and as to each part to which you object, separately set forth the specific basis for the objection.

(d) These Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Data Requests subsequently become known or should your initial response be incorrect or untrue.

(e) For each Data Request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DEFINITIONS

(a) "SouthEast Telephone" means, unless otherwise indicated, SouthEast Telephone, Inc., the competitive local exchange carrier, any predecessors in interest, its parents, subsidiaries, and affiliates, its present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of SouthEast Telephone.

(b) "AT&T Kentucky" means BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky.

(c) "You" and "your" refer to SouthEast Telephone.

(d) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(e) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(f) The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of SouthEast Telephone, including, but not limited to, correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail ("Email") files, and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

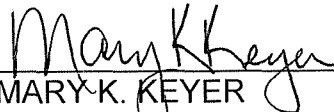
(g) The phrases “refer to” and “relate to” mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

DATA REQUESTS

1. For the 19,981 orders and dates SouthEast Telephone Inc. listed in Exhibit A of its response to the Kentucky Public Service Commission’s Data Request No. 4 and that SouthEast Telephone claims it placed for the wholesale loop port combination (“WLP”) from December 12, 2007 through December 1, 2008, please provide the following information:
 - a. the number of orders by date for new circuits only
 - b. the number of orders by date for feature changes to existing WLP lines
 - c. the number of orders by date for moves of existing WLP lines
 - d. the number of orders by date for conversion of existing lines to WLP
 - e. the number of orders by date for disconnect of WLP lines
 - f. the number of orders by date for other activity not represented by (a) through (e) and specify what those orders were for and the dates of those orders.

2. Provide any and all documentation that SouthEast Telephone provided to AT&T that indicated the dates of the requests and locations of circuits, including WLP circuits, that SouthEast Telephone, Inc. claims it requested AT&T to provision as commingled arrangements.

Respectfully submitted,



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COUNSEL FOR BELL SOUTH
TELECOMMUNICATIONS, INC.,
D/B/A AT&T KENTUCKY


CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individuals by mailing a copy thereof, this 20th day of March, 2009.

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