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PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Ms. Stephanie Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

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

Dear Ms. Stumbo:

AT&T Kentucky wishes to make the following comments regarding the
Commission's Intra-Agency Memorandum ("Memorandum") dated September 25, 2008,
which memorializes the informal conference held in the above-referenced proceeding
on September 11, 2008.

AT&T Kentucky would like to state that AT&T Kentucky indicated that SouthEast
Telephone's request to commingle an unbundled copper loop-nondesigned (UCL-ND)
with a port is a unique combination that no other CLEC has requested even when UNE-
P was available. Because there are numerous combinations that could be available,
AT&T has not developed a process for every possible combination for which there may
be no demand. AT&T began working diligently on developing a process once it
established what exactly SouthEast Telephone was trying to commingle due to the
uniqueness of the request. AT&T Kentucky disagreed, and disagrees, with Mr.
Maynard's comment that a process has been in place for a long time to address this
situation.

AT&T further stated that the UCL-ND is a specific type of loop that is not
available everywhere and that it is not available at the location for which SouthEast
Telephone requested in the order that is the subject of this docket.

AT&T Kentucky respectfully requests that the comments made herein be reflected in the Commission's Intra-Agency Memorandum. The original and ten (10) copies of this letter are enclosed for filing.

Thank you for your attention to this matter.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

cc: Parties of Record

Enclosures

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