



Mary K. Keyer
General Counsel
Kentucky Legal Department

AT&T Kentucky
601 W. Chestnut Street
Room 407
Louisville, KY 40203

T 502-582-8219
F 502-582-1573
mary.keyer@att.com

September 10, 2009

RECEIVED

SEP 11 2009

**PUBLIC SERVICE
COMMISSION**

VIA OVERNIGHT MAIL

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

Re: Petition of Windstream Kentucky East, LLC, for Arbitration of an
Interconnection Agreement With New Cingular Wireless PCS, d/b/a AT&T
Mobility
KSPC 2009-00246

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and five (5)
copies of New Cingular Wireless PCS, d/b/a AT&T Mobility's First Data Requests to
Windstream Kentucky East, LLC.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

cc: Party of Record

742758

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF WINDSTREAM KENTUCKY)	
EAST, LLC, FOR ARBITRATION OF AN)	CASE NO.
INTERCONNECTION AGREEMENT WITH)	2009-00246
NEW CINGULAR WIRELESS PCS,)	
D/B/A AT&T MOBILITY)	

**NEW CINGULAR WIRELESS PCS,
D/B/A AT&T MOBILITY'S FIRST DATA REQUESTS
TO WINDSTREAM KENTUCKY EAST, LLC**

New Cingular Wireless PCS, d/b/a AT&T Mobility ("AT&T Mobility"), hereby serves its First Data Requests to Windstream Kentucky East, LLC ("Windstream").

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) "Windstream" means, unless otherwise indicated, Windstream Kentucky East, LLC, the incumbent 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 Windstream.

(b) "AT&T Mobility" means New Cingular Wireless PCS, d/b/a AT&T Mobility.

(c) "You" and "your" refer to Windstream.

(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 Windstream, 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. Provide a native Excel version of Windstream's cost study with no enabling of any "Protect Workbook" and "Protect Sheet," or provide passwords that permit disabling of any "Protect Workbook" and "Protect Sheet."
2. Provide the total Windstream minutes of use ("MOUs") for each year for the last five years (2004-2008) for the following categories used in Windstream's cost study. Provide an explanation for any zero values.
 - a. Local Terminating
 - b. Local Originating
 - c. Local Tandem Terminating
 - d. Local Tandem Originating
 - e. EAS Terminating
 - f. EAS Originating
 - g. Interstate Toll Terminating
 - h. Interstate Toll Originating
 - i. Intrastate Toll Terminating
 - j. Intrastate Toll Originating
 - k. Recip Comp Terminating
 - l. Recip Comp Originating
 - m. Host/Remote Terminating
 - n. Host/Remote Originating
 - o. LATA Tandem Terminating
 - p. LATA Tandem Originating
3. Provide Windstream's annual reports to shareowners for the past two years (2007-2008).
4. Provide all Windstream's Form 10-K reports submitted to the Securities and Exchange Commission ("SEC") since January 1, 2004.
5. Provide all Windstream's annual and quarterly reports, including gross revenue reports, filed with the Kentucky Public Service Commission since January 1, 2004.
6. Provide all Windstream's annual reports and Form 477 reports for Kentucky filed with the Federal Communications Commission ("FCC") since January 1, 2004.
7. Provide all materials Windstream has provided to financial analysts and potential investors in investor presentations since January 1, 2008.
8. Does Windstream offer Voice over Internet Protocol ("VoIP") with its broadband services in Kentucky?

- a. If so, please describe Windstream's VoIP, including when Windstream began offering VoIP in Kentucky and the current number of Windstream's VoIP subscribers in Kentucky.
9. Provide all work papers, including source documents, supporting Windstream's cost study. Work papers should include, to the extent they exist, all documentation supporting claimed equipment, material and labor costs, as well as all network measurements, such as claimed minutes of use per year, length of interoffice cables, bandwidth of interoffice transmission equipment, cost of debt, cost of equity, etc.
10. Explain the distinction between "composite rate of return," "interstate rate of return," and "intrastate rate of return" as found on the "Cost Factors" page of Windstream's cost study. This explanation should specify which "return" is used in developing Windstream's recommended costs.
11. Explain how expenses associated with service order activities have been excluded in the development of maintenance and joint factors used in Windstream's cost study.
12. Explain the method employed by Windstream to ensure that the costs claimed in its study are forward-looking.
13. For all switching and transport costs claimed in Windstream's study, provide the historical "booked" cost for each line item.
14. Explain what is meant by the description "monthly cost per minute" found on the Results page of Windstream's cost study.
15. Explain the purpose of the NTS Percents found in the Input section of Windstream's cost study.
16. Explain whether the following components are treated as traffic-sensitive or non-traffic-sensitive in Windstream's study:
 - a. Switch processor and matrix costs;
 - b. Initial software and software upgrade costs;
17. List all "host" and all "remote" switches in Windstream's network.
18. State whether each remote switch listed performs a switching function for a call dialed by an end user connected to that remote switch and terminated to another end user connected to that remote switch.
19. Provide a list, on a line-item level of detail, showing all switching investments and costs treated as non-usage-sensitive in Windstream's cost study.

20. Provide the account balances for 2006, 2007 and 2008 for the accounts used to develop Windstream's proposed forward-looking common cost factor. Also, provide the equivalent account balances for the first six months of 2009.
21. What is the vintage of the account balances in the column titled "Embedded Kentucky East Plant" on the "Capital ACF" page in Windstream's cost study?
22. Provide the account balances for 2006, 2007 and 2008 for the accounts corresponding to the rows for the column titled "Embedded Kentucky East Plant" on the "Capital ACF" page in Windstream's cost study.
23. In addition to the 2007 data found in Windstream's cost study, provide the account balances for 2006 and 2008 for the accounts associated with the "Embedded Plant Distribution" found on the "Capital ACF" page.
24. Describe all linkages between data found in the "Transport Termination Equipment Report" and the main portion of Windstream's cost study (pages 2-32 in the pdf file).
25. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for terminating equipment prices for Windstream Kentucky East that correspond to the "IX Electronics Prices" found on the "Electronics Prices" page in the "Transport Termination Equipment Report."
26. Provide a description of the specific equipment, including the identification of the hardware vendor, associated with Windstream's "IX Electronics Prices" found on the "Electronics Prices" page in the "Transport Termination Equipment Report."
27. Explain why the "Loop Electronic Price" is the same as the "IX Electronic Price" for each corresponding facility type as shown on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report."
28. Explain the acronym "STS1" as shown on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report."
29. Name and describe the network systems that are sources for the "Electronic Data" pages in Windstream's "Transport Termination Equipment Report."
30. Page 51 of the pdf file containing Windstream's cost study is labeled "ATTACHMENT B, Electronics Input for Cost Study." Is this the intended description for the material found at pages 52-71? If not, please explain.
31. Describe all linkages between data found in ATTACHMENT B and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

32. Explain the meaning of each acronym found under the heading "InPlaceCode" in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.
33. Explain the length information found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B. This explanation should explicitly describe how the length is calculated for each entry associated with the Albany exchange.
34. Provide the vintage(s) of the material and install cost data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.
35. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for the material costs associated with Windstream's IX facilities in Kentucky consistent with the data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.
36. Who performs the installation activities associated with IX facilities in Kentucky consistent with the data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B?
 - a. If outside vendors are involved, provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for the installation work performed by outside vendors to install IX facilities in Kentucky.
 - b. If Windstream employees are involved, describe each work group included in the "install cost" and the average labor rate for employees performing the work in each work group.
37. Describe all linkages between data found in ATTACHMENT C and the main portion of Windstream's cost study (pages 2-32 in the pdf file).
38. Describe all linkages between data found in ATTACHMENT D and the main portion of Windstream's cost study (pages 2-32 in the pdf file).
39. Provide for each row found on the "Switch Costs" and "Tandem Costs" pages of Windstream's ATTACHMENT C and ATTACHMENT D the following information:
 - a. CLLI code for existing switch
 - b. Switch type for existing switch
 - c. An explanation of the modeled switch type
40. Provide the source file "MDF Power Transmission Worksheet.xls" mentioned in Note (1) as found on the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.
41. Explain why HAI 5.3 default values for the SS7 Switching and Tandem Fixed and Variable Switch costs as found on the "Switch Cost Data" pages of Windstream's

ATTACHMENT C and ATTACHMENT D are reasonable estimates to measure Windstream's SS7 costs in Kentucky.

42. Describe the location of any Windstream SS7 switches and the specific vendor for each SS7 switch. In addition, if Windstream leases any SS7 services, the description should indicate how this fits into its forward-looking SS7 network.
43. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for all prices found on the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.
44. Provide a general description of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D. This description should, at a minimum, identify the modeled switch as either a circuit switch or a soft switch as well as identify the switch vendor.
45. Provide the capacity limits of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D that are part of the technology modeling contained in Windstream's cost study.
46. Provide the "Analysis of all Windstream closed jobs for the year ending 12/31/06" mentioned on the last page of the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.
47. Provide the vintage for the working lines data found on the "Tandems Switches" page of Windstream's ATTACHMENT C.
48. Provide 2008 end-of-year working line counts for each switch found on the "Tandems Switches" page of Windstream's ATTACHMENT C.
49. Provide the vintage for the working lines and host lines data found on the "Host_Remote Switches" pages of Windstream's ATTACHMENT C and ATTACHMENT D.
50. Provide 2008 end-of-year working line and host line counts for each switch found on the "Host_Remote Switches" pages of Windstream's ATTACHMENT C and ATTACHMENT D.
51. Please provide the number of existing softswitches Windstream has under the following circumstances:
 - a. Located in Kentucky
 - b. Located outside of Kentucky
 - c. Located in Kentucky and interconnected with the public switched network
 - d. Located outside of Kentucky and interconnected with the public switched network

- e. Located in Kentucky and the same softswitch vendor and model as contained in Windstream's cost study
 - f. Located outside of Kentucky and the same softswitch vendor and model as contained in Windstream's cost study
52. Describe product management activities associated with transport and termination that are contained in the account balance for product management found in the "Common Costs" page of Windstream's cost study.
 53. Describe sales and advertising activities associated with transport and termination that are contained in the account balances for sales and advertising found in the "Common Costs" page of Windstream's cost study.
 54. Describe customer services activities associated with transport and termination that are contained in the account balance for customer services found in the "Common Costs" page of Windstream's cost study.
 55. Identify the portion of current investment and current expenses for switching expense as found in the "Cost Factors" page of Windstream's cost study associated with digital circuit switching equipment and digital packet switch equipment.
 56. Identify the portion of current investment and current expenses for circuit expense as found in the "Cost Factors" page of Windstream's cost study associated with radio systems, electronic circuit equipment and optical circuit equipment.
 57. Does Windstream currently have in its Kentucky network any of the modeled switches found in the "Switch Cost Data" pages of its cost study? If so, identify each such switch, and whether the switch performs end-office switching, tandem switching or host-remote switching functions.
 58. Explain the distinction between "working lines" and "host lines" as used in the "Host_Remote Switches" pages found in Windstream's cost study.
 59. Identify (and locate by specific tab, column and row reference) in Windstream's cost study its proposed reciprocal compensation rates for terminating traffic originating from AT&T Mobility.
 60. Provide a 2009 demand forecast for each of the MOU traffic categories Windstream has identified in its cost study.
 61. Identify any Kentucky dockets in which Windstream has provided within the past five years any cost estimate for a usage service such as local usage, intrastate switched access, interstate switched access and reciprocal compensation. For each identified docket, please provide the following information:

- a. The name of each study containing a cost estimate for a usage service;
 - b. The month and year each study containing a cost estimate for usage service was submitted in its docket;
 - c. Windstream's public testimony, if any, describing cost study;
 - d. For each qualifying cost study, identify the cost methodology used to develop the cost estimate, *e.g.*, Total Service Long-Run Incremental Cost ("TSLRIC"), Total Element Long-Run Incremental Cost ("TELRIC), average embedded cost, *etc.*;
 - e. For each qualifying cost study, whether or not a Commission order required a modification of the cost study; and
 - f. Whether or not the docket is still open.
62. What percentage of traffic originated by AT&T Mobility and sent to Windstream does Windstream claim should be subject to Windstream's terminating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's terminating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If no traffic studies or other documentation is provided, explain the basis for the claimed percentages.
63. What percentage of traffic originated by Windstream and sent to AT&T Mobility does Windstream claim should be subject to Windstream's originating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's originating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If no traffic studies or other documentation is provided, explain the basis for the claimed percentages.

Respectfully submitted,



Mary K. Keyer
601 W. Chestnut Street, Room 407
Louisville, KY 40203
Telephone: (502) 582-8219
mary.keyer@att.com

Paul Walters, Jr.
15 E. First Street
Edmond, OK 73034
Telephone: (405) 359-1718
pwalters@sbcglobal.net

COUNSEL FOR NEW CINGULAR
WIRELESS PCS, D/B/A AT&T MOBILITY

742289

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individual by electronic mail and by mailing a copy thereof, this 10th day of September 2009.

Honorable Robert C. Moore
Attorney at Law
Hazelrigg & Cox, LLP
415 West Main Street
P. O. Box 676
Frankfort, KY 40602



Mary K. Keyer

742289