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October 16, 2009

RECEIVED

OCT 16 2009

PUBLIC SERVICE
COMMISSION

VIA COURIER

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
KPSC 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, LLC d/b/a AT&T Mobility's Second Data Requests to
Windstream Kentucky East, LLC.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Party of Record

745055

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 SECOND DATA REQUESTS
TO WINDSTREAM KENTUCKY EAST, LLC**

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, on behalf of itself and its wireless operating affiliates (collectively "AT&T Mobility"), hereby serves its Second Data Requests to Windstream Kentucky East, LLC ("Windstream" or "Windstream Kentucky East").

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, LLC d/b/a AT&T Mobility, on behalf of itself and its wireless operating affiliates.

(c) "You" and "your" refer to Windstream or Windstream Kentucky East.

(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

64. Windstream Kentucky East in Exhibit A attached to its response to AT&T Mobility's First Data Request #2 appears to say that it does not "record" certain minutes of use ("MOU") data for the years requested and, thereby, the data are not available.
- a. Has Windstream Kentucky East recorded any usage information (including sampling information) such as MOUs or message counts for any period since 2004 for any category for which Windstream responded that it did not "record" the requested MOUs? For each category Windstream Kentucky East has responded affirmatively, describe the recorded usage information including its vintage and provide the most recent information recorded, if available.
 - b. Did Windstream Kentucky East regularly record any usage information (including sampling information) such as MOUs or message counts for any period prior to 2004 for any category for which Windstream responded that it did not "record" the requested MOUs?
 - c. Does Windstream Kentucky East regularly record such usage information (including sampling information) such as MOUs or message counts currently for any category for which Windstream responded that it did not "record" the requested MOUs?
65. Windstream Kentucky East in Exhibit A attached to its response to AT&T Mobility's First Data Request #2 appears to say that it does not "retain" certain minutes of use ("MOU") data for the years requested and, thereby, the data are not available.
- a. Has Windstream Kentucky East recorded and retained any usage information (including sampling information) such as MOUs or message counts for any period since 2004 for any category for which Windstream responded that it did not "retain" the requested MOUs? For each category Windstream Kentucky East has responded affirmatively, describe the usage information including its vintage and provide the most recent information retained.
 - b. Explain Windstream Kentucky East's policy for retaining MOU data.
66. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which

Windstream Kentucky East describes as “additional cost study support materials.” Regarding the file titled “KY219_ASAP_channel usage by exch.pdf,” please respond to the following requests.

- a. Please describe the system that is the source for this report.
- b. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please explain the meaning of each reported numerical amount and of any notes as well as explain all acronyms found in the report for this exchange.
- c. Please explain the faint handwritten note found towards the top of the first page of the report.
- d. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility’s First Data Request #1.

67. Windstream Kentucky East attached to its response to AT&T Mobility’s First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream describes as “additional cost study support materials.” Regarding the file titled “KY220_ASAP_channel usage by exch.pdf,” please respond to the following requests.

- a. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, would Windstream Kentucky East’s response be the same as its response to AT&T Mobility’s Second Data Request #66(b)? If not, describe anything that would be different to its response to AT&T Mobility Second Data Request #66(b).
- b. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility’s First Data Request #1.

68. Windstream Kentucky East attached to its response to AT&T Mobility’s First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as “additional cost study support materials.” Regarding the file titled “KY219_ASAP_facility count by exch.pdf,” please respond to the following requests.

- a. Please describe the system that is the source for this report.
- b. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please explain the meaning of each reported numerical amount.
- c. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please explain the meaning of the reported CLLI codes. Do these CLLI

- codes identify the "A" and "Z" locations of a circuit, *i.e.*, the end points of a circuit?
- d. Please explain the handwritten note found on the first page of the report.
 - e. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
 - f. The one page report for SHDNKYXA (page 150 of 158 in the pdf file) is partially obscured. Please provide a legible copy of the full page.
69. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_facility count by exch.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #68(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #68(b).
 - b. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
70. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_ASAP_High Cap By Exchange.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please explain the meaning of each reported numerical amount. In addition, explain all possible values for "Juris."
 - c. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please explain the meaning of the reported CLLI codes. Do these CLLI codes identify the "A" and "Z" locations of a circuit, *i.e.*, the end points of a circuit?
 - d. The handwritten note found at the bottom of the second page of the report is illegible. Please provide a legible copy of this page and explain this note.

- e. The handwritten note found at the top of the first page of the report is illegible. Please provide a legible copy of this page and explain this note.
 - f. Using the data for the first exchange found in the report, *i.e.*, ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
 - g. A note on the bottom of page 209 of the pdf file says "pages 1-232 not printed." Please provide these pages and explain why these pages were not printed.
71. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_high cap by exchange.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #70(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #70(b).
 - b. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
72. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream describes as "additional cost study support materials." Regarding the file titled "KY219_Loop Summary table rpt.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, *i.e.*, Albany, please explain the meaning of each reported numerical amount.
 - c. Please explain the meaning of the handwritten amounts found in the report for Albany.
 - d. Please explain the meaning of the handwritten "N/A" found on the first page of the report.
 - e. Using the data for the first exchange found in the report, *i.e.*, Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

73. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Loop Summary table rpt.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #72(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #72(b).
 - b. Please explain the handwritten notes found at pages 1, 3 and 12 of the report.
 - c. Using the data for the first exchange found in the report, *i.e.*, Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
74. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream describes as "additional cost study support materials." Regarding the file titled "KY219_monthly totals by exch_access lines.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, *i.e.*, Albany, please explain the meaning of each reported numerical amount. This explanation should decode the "Line Types."
 - c. Please explain the meaning of the handwritten amounts found in the report for Albany.
 - d. Please explain the meaning of the faint note on the first page that appears to be a date.
 - e. Using the data for the first exchange found in the report, *i.e.*, Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's AT&T Mobility's First Data Request #1.
75. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Monthly Totals by Exch_Access Lines.pdf," please respond to the following requests.

- a. Using the data for the first exchange found in the report, *i.e.*, Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #74(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #74(b).
 - b. Please explain why no handwritten adjustments have been made to Arlington comparable to the handwritten adjustments for Albany.
 - c. Please explain the handwritten adjustments shown for London, Mount Olivet and White Lily.
 - d. Using the data for the first exchange found in the report, *i.e.*, Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
76. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_Summarize Electronic data.pdf," please respond to the following requests.
- a. Please describe the database, "Interexchange.mdb," that is the source for this report.
 - b. Using the data for the first exchange found in the report, *i.e.*, Albany, please explain the meaning of each reported numerical amount
 - c. Please explain the meaning of the handwritten amounts found on the last page of the report.
 - d. Using the data for the first exchange found in the report, *i.e.*, Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
77. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Summarize Electronic data.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #76(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #76(b).
 - b. Using the data for the first exchange found in the report, *i.e.*, Arlington, please provide the mapping for each reported numerical amount in this

report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

78. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Please explain the relationship of the data contain in the file "KY219_Summarize Electronic data.pdf" to data found in each of the following files:
- a. KY219_ASAP_channel usage by exch.pdf,
 - b. KY219_ASAP_facility count by exch.pdf,
 - c. KY219_ASAP_High Cap By Exchange.pdf,
 - d. KY219_Loop Summary table rpt.pdf, and
 - e. KY219_monthly totals by exch_access lines.pdf.
79. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Please explain the relationship of the data contain in the file "KY220_Summarize Electronic data.pdf" to data found in each of the following files:
- a. KY220_ASAP_channel usage by exch.pdf,
 - b. KY220_ASAP_facility count by exch.pdf,
 - c. KY220_ASAP_high cap By exchange.pdf,
 - d. KY220_Loop Summary table rpt.pdf, and
 - e. KY220_Monthly Totals by Exch_Access Lines.pdf.
80. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY East_Lexington IX Fiber Cables.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, *i.e.*, Albany, please explain the meaning of each reported numerical amount.
 - c. Please explain the meaning of the note found immediately above the Albany exchange data.
 - d. Using the data for the first exchange found in the report, *i.e.*, Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

81. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY East_London IX Fiber Cables.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #80(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #80(b).
 - b. Using the data for the first exchange found in the report, *i.e.*, Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
82. Windstream Kentucky East's response to AT&T Mobility's First Data Request #11 says that expenses associated with service order activities have not been removed from Windstream's maintenance factor inputs. Maintenance factors are developed in the "Cost Factors" worksheet of Windstream's cost study.
- a. Please admit or deny that Windstream's response regarding expenses associated with service order activities refers to the amounts found in cells F9, F10, F11, F12 and F13 in the "Cost Factors" worksheet in the Excel file titled "Windstream Kentucky East_RecipComp Study_2009.xls." Windstream should respond with respect to each individual amount if the response varies across the referenced cells. Furthermore, if Windstream's response is to deny, Windstream should identify the specific cells in the Excel version of its cost study that support its response to AT&T Mobility's First Data Request #11.
 - b. What are the vintages of the current investments and current expenses (cells E9, E10, E11, E12, and E13, and F9, F10, F11, F12 and F13 in the "Cost Factors" worksheet) used to develop Windstream's maintenance factors.
 - c. Please provide Windstream Kentucky East's end-of-period balances for 2006, 2007, 2008 and September 2009 for the following plant accounts:
 - i. Account 2210 (Central office-switching)
 - ii. Account 2212 (Digital electronic switching)
 - iii. Account 2230 (Central office-transmission)
 - iv. Account 2232 (Circuit equipment)
 - v. Account 2410 (Cable and wire facilities)
 - vi. Account 2411 (Poles)
 - vii. Account 2421 (Aerial cable)
 - viii. Account 2422 (Underground cable)

- ix. Account 2423 (Buried cable)
 - x. Account 2426 (Intrabuilding network cable)
 - xi. Account 2431 (Aerial wire)
 - xii. Account 2441 (Conduit systems)
 - xiii. Copper cable portion of Account 2421
 - xiv. Copper cable portion of Account 2422
 - xv. Copper cable portion of Account 2423
- d. Please provide Windstream Kentucky East's account balances for 2006, 2007 and 2008 and for the first nine months of 2009 for the following accounts:
- i. Account 6210 (Central office switching expense)
 - ii. Account 6212 (Digital electronic expense)
 - iii. Account 6230 (Central office transmission expense)
 - iv. Account 6232 (Circuit equipment expense)
 - v. Account 6410 (Cable and wire facilities expenses)
 - vi. Account 6411 (Poles expense)
 - vii. Account 6421 (Aerial cable expense)
 - viii. Account 6422 (Underground cable expense)
 - ix. Account 6423 (Buried cable expense)
 - x. Account 6426 (Intrabuilding network cable expense)
 - xi. Account 6431 (Aerial wire expense)
 - xii. Account 6441 (Conduit systems expense)
 - xiii. Copper cable expense portion of Account 6421
 - xiv. Copper cable expense portion of Account 6422
 - xv. Copper cable expense portion of Account 6423
- e. Please provide Windstream Kentucky East's connect and disconnect service order counts for 2006, 2007 and 2008 and for the first nine months of 2009 for the following customer groups:
- i. All customers
 - ii. Only retail customers
 - iii. IXC customers
 - iv. Customers purchasing intrastate services
 - v. Customers purchasing interstate services
 - vi. CLEC customers
- f. Please provide Windstream Kentucky East's counts of newly connected access lines and disconnected access lines for 2006, 2007 and 2008 and for the first nine months of 2009.
- g. Please provide Windstream Kentucky East's counts of newly connected circuits and disconnected circuits for 2006, 2007 and 2008 and for the first nine months of 2009 for the following circuit types:
- i. DS0 loops
 - ii. DS1 loops
 - iii. DS3 loops
 - iv. SONET (*i.e.*, STS1, OC3, OC12, *etc.*) loops
 - v. DS0 transport
 - vi. DS1 transport

- vii. DS3 transport
 - viii. SONET transport
 - h. Please provide Windstream Kentucky East's most recent cost analysis or study for provisioning (connecting and disconnecting) exchange access lines.
 - i. Please provide Windstream Kentucky East's most recent cost analysis or study for provisioning (connecting and disconnecting) private line or special access lines.
 - j. Please identify all network groups involved with provisioning activities for Windstream Kentucky East initiated by customer connection requests. Also, provide an hourly labor rate for each reported work group that Windstream uses in its ordinary course of business for Kentucky.
 - k. Please identify all network groups involved with provisioning activities for Windstream Kentucky East initiated by customer disconnection requests. Also, provide an hourly labor rate for each reported work group that Windstream uses in its ordinary course of business for Kentucky.
83. Windstream Kentucky East has not made any forward-looking adjustment to current maintenance and joint factors, although Windstream claims through its response to AT&T Mobility's First Data Request #12 to have ensured its costs are forward-looking.
- a. What are the vintages of the current investments and current expenses (cells E14, E15, E16, and E17, and F14, F15, F16, and F17 in the "Cost Factors" worksheet) used to develop Windstream's joint factors.
 - b. Please provide Windstream Kentucky East's end-of-period balances for 2006, 2007, 2008 and September 2009 that correspond to the investments found in cells E14, E15, E16, and E17 in the "Cost Factors" worksheet.
 - c. Please provide Windstream Kentucky East's account balances for 2006, 2007, 2008 and the first nine months of 2009 that correspond to the expenses found in cells F14, F15, F16, and F17 in the "Cost Factors" worksheet.
 - d. Please provide Windstream Kentucky East's most recent current-to-book ratios for the investment accounts associated with cells E9, E10, E11, E12, E13, E14, E15, E16, E17, E19, E20, E21, and E22, identify the vintage of each ratio and describe the method of developing these ratios.
 - e. If Windstream Kentucky East is unable to provide the current-to-book ratios requested in AT&T Mobility's Second Data Request #83(e), then please provide the following information for each account for which current-to-book ratios are not provided:
 - i. Windstream Kentucky East's most recent depreciation study, and
 - ii. The current remaining plant in service for each plant vintage from 1989 to 2008.

84. Windstream Kentucky East in its response to AT&T Mobility's First Data Request #19 provides a list of switching investment items that are treated as non-usage sensitive. Please identify the specific cells in the cost study that contain these switching investment items.
85. Windstream Kentucky East provided an Excel spreadsheet titled "AT&T.Exh.F.DR26a.xls" attached to its response to AT&T Mobility's First Data Request #26. The following queries are with respect to this document.
 - a. Please explain the meaning and role of the amounts in the "Alloc" column found in tabs WP7.1, WP7.3 and WP7.4.
 - b. Please provide all documents supporting items on tab WP5.4 having "Forward Looking Engineering Estimate" as its source.
86. Windstream Kentucky East provided an Excel spreadsheet titled "AT&T.Exh.G.DR26b.xls" attached to its response to AT&T Mobility's First Data Request #26. The following queries are with respect to this document.
 - a. Please provide all supporting documents for the amounts found in tab "MDF RR Cable Rack Fuse SysCosts."
 - b. Please provide the source documents mentioned on row 73 in tab "Units and Parts with Discount."
 - c. Please explain the meaning of "NL Cost" and "ACP" as found on tab "NTT 15th & M DACS Cost."
 - d. Please provide all supporting documents for the embedded values used to calculate "Item Cost w/ACP," "Freight Cost," and "Sales Tax" as found on tabs "DS-3 to OC48 via an FW4500" and "NTT 15th & M DACS Cost."
 - e. Please explain the meaning of the highlighting found on tabs "DS-3 to OC48 via an FW4500" and "NTT 15th & M DACS Cost."
87. Windstream Kentucky East provided an Excel spreadsheet titled "AT&T.Exh.H.DR32.xls" attached to its response to AT&T Mobility's First Data Request #32. Please explain the meaning of "10M STRAND" as mentioned in this document.
88. Windstream Kentucky East's response to AT&T Mobility's First Data Request #33 states that "cables less than 24 fibers were changed to 24-fibers." Provide all documents relied upon by Windstream to support this adjustment as needed for a "forward-looking network design."
89. Windstream Kentucky East provided an Excel spreadsheet titled "DR40_MDF Power Transmission Worksheet.xls" aka "AT&T.Exh.K.DR40.xls" attached to its response to AT&T Mobility's First Data Request #40. The following queries are with respect to this document.

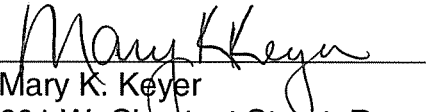
- a. Provide the CS1500 Order Form mentioned on tab "Worksheet." Also, provide any documentation explaining its proper use.
 - b. Provide all supporting documents for the "inst" factor used on line 5 of tab "Worksheet."
 - c. Provide all supporting documents for the "line conversion costs" found on line 22 of tab "Worksheet."
 - d. Provide all supporting documents for the "loading" factor used on line 25 of tab "Worksheet."
 - e. Provide all supporting documents for the "misc inst" factor used on line 33 of tab "Worksheet."
 - f. Provide all supporting documents for the "loading" factor used on line 35 of tab "Worksheet."
 - g. Identify the equipment associated with the "SS7 Costs" found on line 32 of tab "Worksheet."
 - h. Provide all supporting documents for all "input" items including embedded loading factors found in tab "MDF Investment."
 - i. Provide all supporting documents for all "input" items found in tab "Power Investment."
90. Windstream Kentucky East's response to AT&T Mobility's First Data Request #44 states Windstream's cost study used a Nortel CS1500 soft switch platform. Given that Windstream apparently does not currently use soft switches in its Kentucky public switched network, explain why it is reasonable to model costs based on a soft switch platform for Windstream Kentucky East. In addition, provide any analyses performed by Windstream that supports using a soft switch platform rather than a digital circuit switch platform in its cost study.
91. Windstream Kentucky East's response to AT&T Mobility's First Data Request #45 states the "capacity limit of the CS1500 switch used in Windstream East's model is 48,000 lines." Provide all documents relied upon by Windstream to determine this capacity.
92. Windstream Kentucky East provided an Excel spreadsheet titled "DR46_Windstream Capital Loadings_COE_2006.xls" aka "AT&T.Exh.L.DR46.xls" attached to its response to AT&T Mobility's First Data Request #46, which provides an analysis of all closed switch jobs in 2006. The following queries are with respect to this document.
- a. Identify all jobs that involved a new switch or a switch replacement and identify the booked value of the associated switch investment.
 - b. Identify all jobs that involved soft switching equipment replacement and identify the booked value of the associated switch investment.
 - c. Explain the meaning of "Direct Costs 4405 to 4590" and "Engineering 4930."
 - d. Explain the meaning of "Reused Equipment."

- e. Explain how “Allocated Engineering” and “Allocated Supervision” are determined, and provide supporting documentation.
 - f. What interest rate is used for determining Interest During Construction?
 - g. Provide all documents supporting the “Minor Material Loading” factor.
93. Given Windstream Kentucky East’s response to AT&T Mobility’s First Data Request #51 in which Windstream identified no soft switch it operates is connected to the public switched network, explain what actual experience Windstream has for operating soft switches connected to the public switched network.
94. Given Windstream Kentucky East’s response to AT&T Mobility’s First Data Request #52, identify product management (Account 6611) activities and expenses Windstream could avoided if transport and termination associated with reciprocal compensation were not provided in Kentucky.
95. Given Windstream Kentucky East’s response to AT&T Mobility’s First Data Request #53, identify sales and advertising (Accounts 6612 and 6613) activities and expenses Windstream could avoided if transport and termination associated with reciprocal compensation were not provided in Kentucky.
96. Given Windstream Kentucky East’s response to AT&T Mobility’s First Data Request #54, identify customer services (Account 6623) activities and expenses Windstream, excluding activities associated with customer service order requests, could avoid if transport and termination associated with reciprocal compensation were not provided in Kentucky.
97. Given Windstream Kentucky East’s response to AT&T Mobility’s First Data Request #54, what expense accounts are associated with (a) setting up and maintaining of reciprocal compensation customer accounts, (b) maintaining usage records for reciprocal compensation customers, (c) billing and collection costs for reciprocal compensation customers, and (d) inquiries made by reciprocal compensation customers. In addition, provide the 2008 booked amounts for each of these categories.
98. Windstream Kentucky East provided in response to AT&T Mobility’s First Data Request #60 a 2009 demand forecast for each MOU category used in its cost study. The following queries are with respect to this forecast.
- a. Provide all documents relied upon by Windstream to develop this forecast.
 - b. Explain how Windstream was able to develop this forecast without the reliance on all of the historical information AT&T Mobility requested in AT&T Mobility’s First Data Request #2.

99. Describe how Windstream's study determines what percentage of the Nortel CS1500 modeled switches are not involved in the termination of voice traffic from wireless and wireline providers.
- a. What is that percentage?
100. Describe how Windstream's study determines what percentage of interoffice cable costs to allocate to uses other than the transport of voice traffic from wireless and wireline providers.
- a. What is that percentage?
101. Describe how Windstream's study determines total demand and utilization of the transport network.
- a. What is that total demand in DS0 equivalents?
 - b. Describe how total demand determined in Windstream's study includes all voice trunks and special circuits of varying bandwidth.
 - c. In determining total demand, does Windstream's study treat a special broadband circuit as the equivalent of a single voice grade circuit?
 - i. If not, explain how Windstream's study treats such circuits differently.
102. As a follow-up to AT&T Mobility's First Data Request #13, AT&T Mobility requests information regarding "booked" costs associated with the following components used by Windstream Kentucky East to develop its "forward-looking" switching and transport costs:
- a. Based on the level of detail found in tab "IX Facilities Detail" of the workbook "IX Facilities_KYEast.xls," provide for each requested period "materials" and "install cost" along with "length" for jobs completed in 2006, 2007, 2008 and the first 9 months of 2009. In addition, identify the account associated with each "booked" cost (*i.e.*, investment).
 - b. If information is not available, as requested in subpart (a), please fully explain why such information is not available in each instance and provide the information that most closely matches the "booked" data requested in subpart (a) (*i.e.*, the "materials" and "install cost" information.) In addition, if "length" information is not available at the same level of granularity as the "materials" and "install cost" information, provide the "length" information at the most granular level available consistent with the detail found in tab "IX Facilities Detail."
 - c. Based on the level of detail found under columns C-I and L-R in tab "IX Fiber Equip \$" of the workbook "Electronics Input_KYEast_09.xls," provide for each requested period the number of installed equipped circuits corresponding to each column from C to I and the "booked" circuit equipment investment corresponding to each column from L to R for jobs

- completed in 2006, 2007, 2008 and the first 9 months of 2009. In addition, identify the account associated with each “booked” cost (*i.e.*, investment).
- d. If information is not available, as requested in subpart (c), please fully explain why such information is not available in each instance and provide the information that most closely matches the “booked” circuit equipment investment requested in subpart (a) for each exchange.
103. Windstream Kentucky East states in its response to AT&T Mobility’s DR #16 that (a) switch processor and matrix costs, and (b) initial software and software upgrade costs “are treated as traffic-sensitive in Windstream East’s cost study.” Please provide all studies or analyses relied upon by Windstream to support this treatment.
104. Windstream Kentucky East in its response to AT&T Mobility’s DR #18 that eight switches listed in its cost study are not capable of performing switching. Please explain why it is efficient that these switches are not capable of performing switching.

Respectfully submitted,


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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 16th day of October 2009.

Honorable Robert C. Moore
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