

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Windstream Kentucky East, LLC for)
Arbitration of an Interconnection)
Agreement with New Cingular Wireless)
PCS, LLC, D/B/A AT&T Mobility)
)
)
)

Case No. 2009-00246

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COMMISSION

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

Windstream Kentucky East, LLC ("Windstream East") submits as follows its supplemental response to New Cingular Wireless PCS d/b/a AT&T Mobility's ("AT&T Mobility") First Data and Second Requests to Windstream East.

GENERAL OBJECTIONS TO DEFINITIONS OR INSTRUCTIONS

Windstream East objects to any of AT&T Mobility's definitions or instructions to the extent they purport to require production by Windstream East of knowledge and/or information protected by the attorney-client privilege, the work product doctrine or other applicable privilege or immunity, including privileged information possessed by its attorneys. Further, Windstream East objects to any attempt by AT&T Mobility to request information pertaining to entities not subject to the arbitration or this Commission's jurisdiction.

Windstream East also objects to any data request propounded by AT&T Mobility to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information or documents that are vague, overly burdensome, or not relevant to the claims asserted by AT&T Mobility in this matter.

Windstream East further objects to providing information that was previously provided to AT&T Mobility, that would require Windstream East to construct information not maintained in the regular course of business, or that otherwise is publicly available to AT&T Mobility.

SPECIFIC SUPPLEMENTAL RESPONSES TO DATA REQUESTS

5. Provide all Windstream's annual and quarterly reports, including gross revenue reports, filed with the Kentucky Public Service Commission since January 1, 2004.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that Kentucky Public Service Commission website may be accessed at http://psc.ky.gov/agencies/psc/industry/telcom_idx.htm. Once there, click on the following tabs/links in this order: PSC Home, SiteMap, Commission Records, Search Financial Reports, then select Local Exchange Carriers, then select Local Exchange Carrier or Local Exchange Carrier – Kentucky Operations Only, and then select Windstream Kentucky East.

6. Provide all Windstream's annual reports and Form 477 reports for Kentucky filed with the Federal Communications Commission ("FCC") since January 1, 2004.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request as being overly broad and vague and not likely to lead to any relevant or discoverable information in this proceeding. Additionally, Windstream East objects to this request on the grounds that it requests confidential, proprietary and competitively sensitive information.

13. For all switching and transport costs claimed in Windstream's study, provide the historical "booked" cost for each line item.

SUPPLEMENTAL RESPONSE: See Supplemental Response to Second Data Request #102.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: Vendor will not give permission to share contract.

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.

SUPPLEMENTAL RESPONSE: See attachments “DR36a_Triple D MCA #71107A10/pdf” and “DR36b_Triple D Placement cost.pdf.” attached herein collectively as Exhibit A.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: See attachment "DR43_Nortel CS1500 Switch Pricing.xls." attached herein as Exhibit B.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: There are four files for the traffic study (Local & EAS only). The first is the Total PEG counts for each KY switch for 10/07 ("DR #64 File #1 Total Orig PEGS to ATT.xls") The second file is the summary of usage for each switch ("DR #64 File #2 Original Study to ATT.xls"). When performing the study it was discovered that some of the switches total PEGS and trunk types were not identified correctly. Another study (07/09 to 12/09, "DR #64 File #3 Total Orig PEGS #2 to ATT.xls") was performed using more data for just the offices in question and the study was updated with the new quantities (see switches highlighted in blue in "DR #64 File #4 Revised Study to ATT.xls"). These four Excel documents are attached herein collectively as Exhibit C.

Windstream East Party Supporting the Response: David Blessing

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.

b. Explain Windstream Kentucky East's policy for retaining MOU data.

SUPPLEMENTAL RESPONSE: As a practice, Windstream East does not record and retain switched minutes that are not required to be used in our billing systems.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.
 - 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.

SUPPLEMENTAL RESPONSE:

- b. In response to AT&T Mobility's request for definitions of these terms, Windstream East responds that these are industry standard terms and the industry standard definitions apply. The exception is the term "ALLTEL" referenced on the Tandem Channels. It has already been noted that these are simply "Tandem Channels" and the ALLTEL designation is a reporting carryover from before Windstream became a separate entity.
- d. The data in the file titled "KY219_ASAP_channel usage by exch.pdf" map to the attachment "Electronics Input_Ky_East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in columns titled "TrkToll", "TrkMixed", "TrkEas", "TelricPrivateLine", "LocalPrivateLine", "Other", "CommonTransportToll", "CommonTransportMixed", "CommonTransportEas", "DedicatedTransportToll", "DedicatedTransportMixed", "DedicatedTransportEas", "TandemTransportToll", "TandemTransportMixed", and "TandemTransportEas". Circuit quantities that map to the "Electronics Input_Ky_East_09.xls" attached herein as Exhibit D worksheet are used in the Windstream East TELRIC model to develop circuit termination investment values. The Albany, KY exchange data is found on the row where Exchange Name ID equals "743" in the third column.

Windstream East Party Supporting the Response: David Blessing

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 Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_channel usage by exch.pdf," please respond to the following requests.
- 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 cells(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

SUPPLEMENTAL RESPONSE:

- b. See Response to Data Request #66(d). The Arlington, KY exchange data is found on the row where Exchange Name ID equals "744".

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- e. The data in the file titled "KY219_ASAP_facility count by exch.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in columns titled "FacOC48", "FacOC12", "FacOC03", "FacSTS1", and "FacDS3". The Albany, KY exchange data is found on the row where Exchange Name ID equals "743" in the third column.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- b. See Response to Data Request #68(e). The Arlington, KY exchange data is found on the row where Exchange Name ID equals "744".

Windstream East Party Supporting the Response: David Blessing

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.

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.

SUPPLEMENTAL RESPONSE:

f. The data in the file titled "KY219_ASAP_High Cap by exchange.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in columns titled "HighCapDS3", "HighCapDS1", "LocalHighCapDS3", and "LocalHighCapDS1". The Albany, KY exchange data is found on the row where Exchange Name ID equals "743" in the third column.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- b. See Response to Data Request #70(f). The Arlington, KY exchange data is found on the row where Exchange Name ID equals "744".

Windstream East Party Supporting the Response: David Blessing

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 Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_Loop Summary Table rpt.pdf," please respond to the following requests.
- 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 cells(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

SUPPLEMENTAL RESPONSE:

- e. The data in the file titled "KY219_ASAP_Loop Summary Table rpt.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in columns titled "2wanalogloops", "4wanalogloops", "4wdigitalloops", "2wisdnloops", "ds1loops", and "ds0loops". The Albany, KY exchange data is found on the row where Exchange Name ID equals "743" in the third column.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- c. The data in the file titled "KY220_ASAP_Loop Summary Table rpt.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in columns titled "4wanalogloops", "4wdigitalloops", and "ds1loops". The Arlington, KY exchange data is found on the row where Exchange Name ID equals "744" in the third column.

Windstream East Party Supporting the Response: David Blessing

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 Kentucky East 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.
- 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.

SUPPLEMENTAL RESPONSE:

- e. The data in the file titled "KY219 monthly totals by exch.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in the column titled "PotsLoops". The hand adjusted number titled "POTS input" maps. The Albany, KY exchange data is found on the row where Exchange Name ID equals "743" in the third column.

Windstream East Party Supporting the Response: David Blessing

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.

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 the 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.

SUPPLEMENTAL RESPONSE:

d. The data in the file titled "KY220_monthly totals by exch.pdf" map to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data," in the column titled "PotsLoops". NOTE: - Since the 2 wire/4 wire adjustment was NOT manually noted on this report, the 2 wire and 4 wire quantities from the Loop Summary Table Report must be subtracted from the Arlington total to obtain the correct PotsLoops (Ref. response to DR74c and DR75b). The Arlington, KY exchange data is found on the row where Exchange Name ID equals "744" in the third column.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- d. The Report titled "KY219_Summarize electronic data.pdf," is *only a summary* of all the ASAP reports. The data from this report *is not used for inputs* and therefore does not map to an EXCEL file.

Windstream East Party Supporting the Response: David Blessing

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.

- 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.

SUPPLEMENTAL RESPONSE:

- b. The Report titled "KY220_Summarize electronic data.pdf," is *only a summary* of all the ASAP reports. The data from this report *is not used for inputs* and therefore does not map to an EXCEL file.

Windstream East Party Supporting the Response: David Blessing

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 [sic] 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.

SUPPLEMENTAL RESPONSE: The "ASAP channel usage by Exchange" report, "ASAP Facility count by exchange" report, "ASAP High Cap By Exchange" report and "Loop Summary Table Report" are the original source documents for all trunks, local loop and IX termination quantities used in the study while the "Monthly Totals by Exchange" report furnishes the POTS lines. These reports are the source for the inputs to the attachment "Electronics Input_Ky East_09.xls" attached herein as Exhibit D, worksheet "Electronic Data,".

Windstream East Party Supporting the Response: David Blessing

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 [sic] 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.

SUPPLEMENTAL RESPONSE: See Response to Data Request #78.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: Windstream East states that there are no mapping issues for this data request because mapping has already been provided in Windstream East's previous response to this data request.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: Windstream East states that are no mapping issues for this data request because mapping has already been provided in Windstream East's previous response to this data request.

Windstream East Party Supporting the Response: David Blessing

82. Windstream Kentucky East attached to its 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.
- 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 2433
 - 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 access lines and disconnected access lines 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.
- 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.

SUPPLEMENTAL RESPONSE:

- a. Admit
- c. Plant account balances are provided in Exhibit "DR82_KY East Account Balances.xls" attached herein as Exhibit E.

- d. Expense account balances are provided in attachment “DR82_KY East Account Balances.xls” attached herein as Exhibit E.
- e. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East provides attachment “DR #82E Service Order info to ATT.xls” attached herein as Exhibit F. This attachment addresses data request #82(e)(iii) and (vi) only; data is not available for data request #82(e)(ii), (iv) or (v).
- f. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East provides attachment “DR82f_KY East Access line Connect Data.xls”, attached herein as Exhibit G.
- g. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection Windstream East states that data is not available.
- h. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East states that recent cost analyses or studies for provisioning (connecting and disconnecting) exchange access lines do not exist for Windstream East.
- i. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East states that recent cost analyses or studies for provisioning (connecting and disconnecting) private line or special access lines do not exist for Windstream East.
- j. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East states that the typical network groups involved with provisioning activities for Windstream East initiated by customer connection requests are: Interexchange Carrier Services Center (“ICSC”), Outside Plant (“OSP”) Engineering, Assignment/Activation, Transport Eng/Circuit Design and Special Svc. Test Ctr.
- k. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East’s cost study. Without waiving its objection, Windstream East states that the typical network groups involved with provisioning activities for Windstream East initiated by customer disconnection requests are: Interexchange Carrier Services Center (“ICSC”), Outside Plant (“OSP”) Engineering, Assignment/Activation and Transport Eng/Circuit Design. The hourly labor rates for each reported work group are _____ (redacted) respectively.

Windstream East Party Supporting the Response: David Blessing

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.
- b. Please provide Windstream Kentucky East's end-of-period balances for 2006, 2007 and 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 2005, 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.
 - 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.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request to the extent that it states a legal opinion. Without waiving its objection, Windstream East provides the following response:

- b. Investment balances are provided in attachment "DR83_KY East Joint Balances.xls" attached herein as Exhibit H.
- c. Expense balances are provided in attachment "DR83_KY East Joint Balances.xls" attached herein as Exhibit H.
- e. Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding. Without waiving its objection, Windstream East provides its most recent depreciation study (Four attachments: "DR83_e_i_219 Part 1.pdf", "DR83_e_i_219 Part 2.pdf", "DR83_e_i_220 Part 1.pdf" and "DR83_e_i_220 Part 2.pdf.") and also attachment "DR83e_ii_Ky East Vintage Balances.xls" which gives remaining plant balances by account and vintage year from 1989 to November 2009, attached herein collectively as Exhibit I.

Windstream East Party Supporting the Response: David Blessing

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 that document:

- b. Please provide all documents supporting items on tab WP5.4 having "Forward Looking Engineering Estimate" as its source.

SUPPLEMENTAL RESPONSE:

- b. The referenced factors are not used to develop the Material Cost inputs for Windstream East's cost study and therefore Windstream East objects to this question as not being reasonably calculated to lead to the discovery of admissible evidence and/or seeks information not relevant to the claims asserted by AT&T Mobility in this matter. Without waiving its objection, Windstream East states that these are factors that were established through discussions between Windstream engineering and cost study personnel, for which written documentation does not exist.

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".
 - e. Please explain the meaning of the highlighting found on tabs "DS-3 to OC48 via an FW4500" and "NTT 15th & M DACS Cost".

SUPPLEMENTAL RESPONSE:

- a. See attachment "AT&T.Exh.G.DR26b.xls", attached herein as Exhibit J.
- b. See attachment "AT&T.Exh.G.DR26b.xls", attached herein as Exhibit J.
- e. See attachment "AT&T.Exh.G.DR26a.xls", attached herein as Exhibit K.

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.

g. Identify the equipment associated with the “SS7 Costs” found on line 32 of tab “Worksheet”.

SUPPLEMENTAL RESPONSE:

g. Windstream East does not have a list of the equipment associated with the “SS7 Costs” found on line 32 of tab “Worksheet”. The \$8 per line referenced on line 32 covers the following items:

Common Channel Signaling #7 software
CCS7 Trunk Signaling software
SS7 Link Hardware
Common STP Switch Investment

Windstream East Party Supporting the Response: David Blessing

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 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.

SUPPLEMENTAL RESPONSE: The FCC rules require use of a forward-looking switch design in the cost study. In the judgement of Windstream East engineers, the Nortel CS1500 meets the Commission's standard for use of the most efficient telecommunications technology currently available. No analyses are available.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: Capacity support documentation is provided in attachment "DR91_CS1500 Capacity.xls". Nortel support for this capacity is provided in attachment "DR91_FILE 1-ext_cs1500_pss5_june07_update_v2.1.pdf" (see page 14 of 35) and attachment "DR91_File 297-3102-100.03.02.pdf" (see page 7 of 124). These three files are attached herein collectively as Exhibit L.

Windstream East Party Supporting the Response: David Blessing

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.
- 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.

SUPPLEMENTAL RESPONSE:

- e. Windstream East is supplying additional documentation concerning the allocation process in attachment “DR92e Capitalized Charges Allocation.doc”, attached herein as Exhibit M, while maintaining that an on-site visit would be recommended to view the voluminous records and the functioning allocation process . Windstream East states that the information is not used in its cost study.
- f. Interest During Construction (“IDC”) is based on the average cost of borrowing for the corporation. The IDC interest rate varies month to month. The rate for November 2009 is ____ (redacted), and Windstream East states that this information is not used in the study.
- g. The rates of ____ (redacted) for minor materials and _____ (redacted) for freight are Windstream East engineering job cost standards, for which no further documentation exists.

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.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding. Without waiving its objection, Windstream East states that actual experience is neither required nor relevant to the forward-looking switch design used in a TELRIC study.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding. Without waiving its objection, Windstream East states that the functions described in this data request are performed by Windstream's Wholesale Services group in conjunction with various Accounting and Customer Services groups. The costs associated with the various work groups are booked in Customer Services (Account 6623) and Accounting and Finance (Account 6721). The 2008 booked amounts are not available since these costs are not booked by individual type of wholesale customer nor by type of function performed.

Windstream East Party Supporting the Response: David Blessing

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.

SUPPLEMENTAL RESPONSE:

- a. Windstream East objects to this request on the grounds that it requests confidential, proprietary and competitively sensitive information.

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?

SUPPLEMENTAL RESPONSE: The Windstream East study determines the percentage of cable costs to allocate to uses other than the transport of voice traffic, which as stated previously is ___(redacted) based on use of a historical percentage. No Windstream East documentation exists to support this historical percentage.

Windstream East Party Supporting the Response: David Blessing

102. As follow-up to AT&T Mobility's First Data Request #13, AT&T Mobility request 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 and 2008 and the first nine 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.

SUPPLEMENTAL RESPONSE: Windstream East objects to this request as not being relevant to the forward-looking costs developed in Windstream East's cost study. Actual booked investment values were not used to develop the investment inputs to the study and creation of such would create an unnecessary burden on Windstream East. Without waiving its objection, Windstream East provides the following response:

- a. Data cannot be provided as requested. See the response to subpart (b) for additional details and account information.
- b. The IX Facilities in the cost study were developed using material and installation cost inputs that combined poles with aerial cable and conduit with underground cable. The booked pole and conduit investment costs are separately maintained on Windstream East's property records and cannot be identified to type of cable or to any specific cable segment. Windstream has provided booked investment information for all fiber

cable installations for jobs completed in 2006, 2007, 2008 and the first 9 months of 2009 in Excel spreadsheet titled “DR102b_KY East Fiber Additions.xls”, attached herein as Exhibit N. Data includes all fiber cable investment for the specified periods, both inter- and intra-exchange. The “Install Cost” column includes installation (placement) costs, minor materials, engineering, sales tax, IDC, and all other investment costs not included in the “Materials” column. Booked investment was recorded to Account 2421 – Aerial Fiber Optic Cable, Account 2422, Underground Fiber Optic Cable, and Account 2423 – Buried Fiber Optic Cable. Investment for Poles (Account 2411) and Conduit (Account 2441) are not included with the cable costs as they were in the cost study. To match the aerial cable costs in the study requires addition of the cost for one (1) 35-foot pole and anchors to the book cost per 1,000 feet of cable. Average booked pole costs have been provided in the attachment at the bottom of worksheet “Fiber Facilities Detail.” To match the underground cable cost in the study requires the addition of conduit costs to the book cost for every 1,000 feet of cable. Insufficient activity existed to derive a “book” conduit cost for the requested vintages. Therefore, the amount from the cost study has been calculated and provided in the attachment at the bottom of worksheet “Fiber Facilities Detail.”

- c. The requested circuit investment data is recorded in Account 2232, Circuit Equipment. The recorded investment detail is not available. See response to subpart (d) for an explanation.
- d. Data is not available as requested because Windstream’s Job Cost (work order) system and Continuing Property Records do not record investment information for transport termination equipment at the individual circuit level. Booked investment data would not closely match the level of detail found in the cost study.

Windstream East Party Supporting the Response: David Blessing

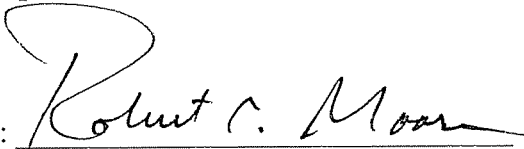
- 103.** Windstream Kentucky East states in its response to AT&T Mobility's DR #16 that (a) switch processor and matrix costs, and (b) initial software and software upgrade costs "are treated as traffic-sensitive in Windstream East's cost study". Please provide all studies or analyses relied upon by Windstream to support this treatment.

SUPPLEMENTAL RESPONSE: No Windstream East-created studies exist.

Windstream East Party Supporting the Response: David Blessing

Respectfully Submitted,

Date: 12/15/09

By: 

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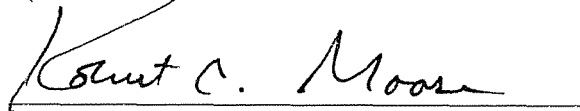
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CERTIFICATE OF SERVICE

On this 15th day of DECEMBER, 2009, true and correct copies of the foregoing **RESPONSES** were transmitted via United States certified mail, postage prepaid, return receipt requested to:

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WINDSTREAM EAST EXHIBITS A-N

REDACTED