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December 28, 2009

**PLEASE NOTE THAT THE ORIGINAL OF THIS FILING
CONTAINS CONFIDENTIAL COMMERCIAL INFORMATION**

Via Hand-Delivery

Mr. Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

DEC 28 2009

**PUBLIC SERVICE
COMMISSION**

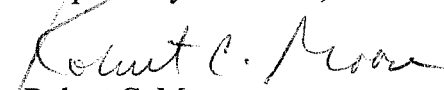
Re: Petition of Windstream Kentucky East, LLC ("Windstream") for Arbitration of an Interconnection Agreement with New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility
Case No. 2009-00246

Dear Mr. Derouen:

Please find enclosed for filing in the above referenced case the original and five (5) copies of Windstream Kentucky East, LLC's Amendment to its Supplemental Responses to New Cingular Wireless PCS, d/b/a AT&T Mobility's First and Second Data Requests to Windstream Kentucky East, LLC ("Amendment to Supplemental Responses"). Exhibit "O" to Windstream's Amendment to Supplemental Responses contains confidential commercial information and Windstream files herewith its Petition for Confidential Treatment of Exhibit "O" pursuant to 807 KAR 5:001, Section 7. Please note that Exhibit "O" has been redacted from the 5 copies of Windstream's Amendment to Supplemental Responses, but the original of the Amendment to Supplemental Responses contains an unredacted copy of Exhibit "O". The copy of the Amendment to Supplemental Responses served upon New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility on this date also contains the confidential commercial information.

Please call me if you have any questions concerning this filing, and thank you for your attention to this matter.

Respectfully submitted,


Robert C. Moore

RCM/db

cc: Stacy Majors

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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DEC 28 2009

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

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

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

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.

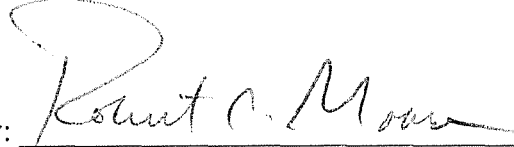
SPECIFIC AMENDED RESPONSES AND OBJECTIONS TO DATA REQUESTS

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: See attachment "DR35a_Superior Cable purch agreement.pdf", attached herein as Exhibit O.

Date: 12/28/09

Respectfully Submitted,

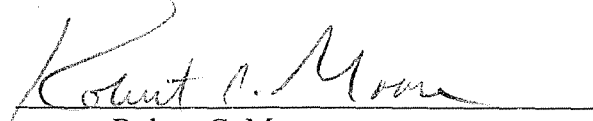
By: 

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Frankfort, KY 40602-0676
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Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
Little Rock, AR 72212
501-748-6873

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 28th day of December, 2009 on Jeff R. Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615 and by first class mail, postage pre-paid on Mary K. Keyer, General Counsel/AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, and Paul Walters, Jr., 15 East 1st Street, Edmond, Oklahoma 73034,.



Robert C. Moore

EXHIBIT "0"
REDACTED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

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

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DEC 28 2009

PUBLIC SERVICE
COMMISSION

Case No. 2009-00246

WINDSTREAM KENTUCKY EAST, LLC'S
PETITION FOR CONFIDENTIAL TREATMENT

Comes Windstream Kentucky East, LLC (“Windstream East”), by counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission (“Commission”) for an order granting confidential treatment to Windstream East’s Exhibit “O” attached to its Amendment to its Supplemental Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility’s First and Second Data Requests (“Amendment to Supplemental Responses”). In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for the Exhibit “O” attached to its Amended Response. Exhibit “O” contains proprietary, confidential information that would aid competitors of Windstream East, if released, and such confidential and proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870 et seq. The release of the information contained in Exhibit “O” would also aid the competitors of the vendor whose information is contained in the exhibit.

2. The information contained in Exhibit "O" contains highly confidential and proprietary information regarding a contract between Windstream and one of its vendors, including sensitive and protected price information and other confidential terms.

3. Providers of the services offered by Windstream East, including wireless, retail and wholesale telephone services and telephone-related services, operate in a highly competitive marketplace where such confidential information is closely guarded to insure it is not disclosed to competitors.

4. This information is not generally disclosed to non-management employees of Windstream and is protected internally by Windstream as confidential and proprietary information.

5. The disclosure of the confidential and proprietary information contained in Exhibit "O" would result in significant or irreparable harm to Windstream East, and also to the vendor with whom it has the contract contained in the Exhibit "O", by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information and the regulations of the Commission contemplate the filing of such information under a confidentiality order.

6. Windstream East seeks confidential treatment for the entirety of Exhibit "O" because all of the information contained in the same is highly confidential and proprietary information.

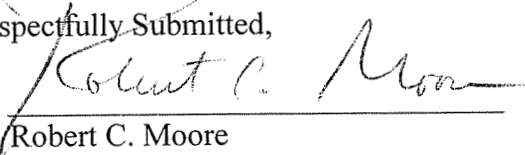
Pursuant to the above referenced statements, Windstream East requests that this information be deemed confidential by the Commission.

WHEREFORE, Windstream East respectfully requests that the Commission enter all necessary orders granting confidential treatment as requested herein.

Date: 12/28/09

Respectfully Submitted,

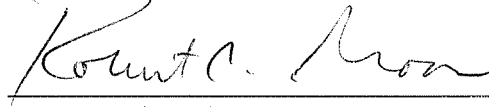
By:


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Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
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Robert C. Moore