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FAX: (502) 875-7158  
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May 27, 2010

RECEIVED

MAY 27 2010

PUBLIC SERVICE  
COMMISSION

**Via Hand-Delivery**

Mr. Jeff R. Derouen

Executive Director

Public Service Commission

211 Sower Boulevard

P. O. Box 615

Frankfort, Kentucky 40602-0615

Re: Windstream Kentucky East, LLC's ("Windstream") Petition for Arbitration  
Case No. 2009-00246

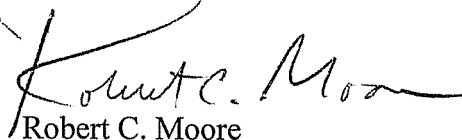
Dear Mr. Derouen:

Please find enclosed for filing in the above referenced proceeding the following documents:

- 1) Notice of Filing of Windstream's Updated Cost Study, with Attachments A through J (one unredacted paper copy of the Updated Cost Study and Attachments A through J and five digital copies of same);
- 2) Notice of Filing of Windstream's Updated Cost Study, with Attachments A through J (one redacted paper copy);
- 3) Windstream's Petition for Confidential Treatment of the Updated Cost Study and Attachments A through J.

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

Respectfully submitted,

  
Robert C. Moore

RCM/neb

Enclosures

cc: Stacy Majors

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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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Case No. 2009-00246

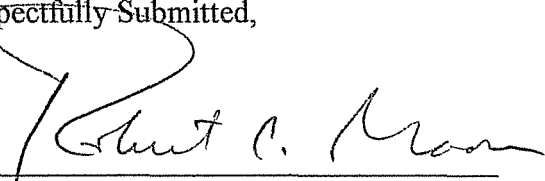
**NOTICE OF FILING OF WINDSTREAM KENTUCKY EAST, LLC'S  
UPDATED COST STUDY**

**REDACTED VERSION**

Comes Windstream Kentucky East, LLC ("Windstream East"), by counsel, and pursuant to 807 KAR 5:001, Section 7, and the Kentucky Public Service Commission's ruling of September 30, 2010, and hereby files its Updated Cost Study with Attachments A through J. A Petition for Confidential Treatment of the Updated Cost Study and Attachments A through J is filed simultaneously herewith.

Respectfully Submitted,

Date: 5/27/10

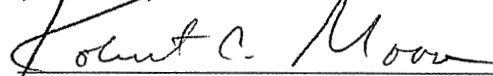
By: 

Robert C. Moore  
Hazelrigg & Cox, LLP  
P.O. Box 676  
415 West Main Street  
Frankfort, KY 40602-0676  
502-227-2271

Stacy Majors  
Regulatory Counsel  
Windstream Communications, Inc.  
4001 Rodney Parham Road  
Little Rock, Arkansas 72212-2442

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 27<sup>th</sup> day of May, 2010 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, on Paul Walters, Jr., 15 East 1<sup>st</sup> Street, Edmond, Oklahoma 73034.

  
\_\_\_\_\_  
Robert C. Moore

# UPDATED COST STUDY

Redacted

**ATTACHMENT A**

**REDACTED**

2009 cs1500  
Update .4.13.10.XLS

**ATTACHMENT B**

**REDACTED**

IX Facilities \_KY East\_2009  
Prices\_Ad for non-IX fiber.4.13.10.xls

**ATTACHMENT C**

**REDACTED**

Mapping Document for Updated  
Model 1.4.16.10.xls

**ATTACHMENT D**

**REDACTED**

Summary of Changes in 2010 updated study.4.16.10.doc



**ATTACHMENT E**

**REDACTED**

Switch Replacement\_2010  
Update\_KY220.4.13.10.xls

**ATTACHMENT F**

**REDACTED**

**WIN WACC\_2010.4.13.10.xls**

**ATTACHMENT G**

**REDACTED**

Electronics Input\_2010\_KY East  
Revised.4.13.10.xls

**ATTACHMENT H**

**REDACTED**

Kentucky-Verizon Summary  
Usage for Recip Comp04-05-10.xls

**ATTACHMENT I**

**REDACTED**

**MDF Power  
Worksheet\_2009.4.13.10.xls**

**ATTACHMENT J**

**REDACTED**

Switch Replacement\_2010  
Update\_KY219.4.13.10.xls

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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MAY 27 2010

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 the attached Updated Cost Study and Attachments A through J updating the original Cost Study filed in this arbitration proceeding by Windstream East on September 17, 2009. In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for its Updated Cost Study and Attachments A through J, all of which contain 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.

2. Windstream East's Updated Cost Study contains specific dollar figures related to Windstream East's costs of providing service in Kentucky. This information constitutes a trade secret because it is commercial information, that if disclosed, could cause substantial competitive harm to Windstream East. This information is not publicly

available. The financial information contained in the Updated Cost Study is based on highly confidential and proprietary Windstream network and traffic information, as well as highly confidential and proprietary switching information, and represents highly confidential costs of providing service. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive disadvantage to Windstream East.

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 the Updated Cost Study and associated attachments would result in significant or irreparable harm to Windstream East 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 the Updated Cost Study and associated attachments 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 for its Updated Cost Study and Attachments A through J as requested herein.

Date: 5/27/10

Respectfully Submitted,

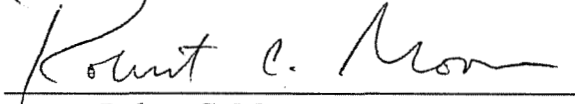
By: 

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A handwritten signature in cursive script, reading "Robert C. Moore", written over a horizontal line.

Robert C. Moore