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June 16, 2010

**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

JUN 17 2010

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

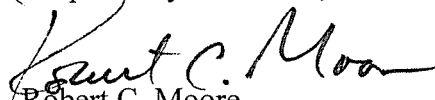
Dear Mr. Derouen:

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

- 1) One (1) unredacted, confidential copy of Windstream Kentucky East, LLC's Updated Responses to New Cingular Wireless PCS, D/B/A AT&T Mobility's Data Requests To Windstream Kentucky East, LLC, Based on Updated Cost Study Submitted by Windstream Kentucky East, LLC (hereinafter "Updated Responses due to Updated Cost Study").
- 2) Five (5) redacted, public confidential copies of Windstream Kentucky East, LLC's (hereinafter "Updated Responses due to Updated Cost Study).
- 3) Windstream's Petition for Confidential Treatment of the confidential information contained in Windstream Kentucky East, LLC's (hereinafter "Updated Responses due to Updated Cost Study).

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
Enclosures
cc: Stacy Majors

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)

JUN 17 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 certain of Windstream East's Updated Responses 9, 15, 16, 19, 24, 31, 34, 37, 41, 46, 47, 49, 52, 53, 60, 64, 99, 100 and 108, and Attachments A-E to its Updated Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility's Data Requests to Windstream Kentucky East Based on Updated Cost Study Submitted by Windstream Kentucky East ("Updated Responses"). In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for the Updated Responses 9, 15, 16, 19, 24, 31, 34, 37, 41, 46, 47, 49, 52, 53, 60, 64, 99, 100 and 108, and Attachments A-E to its Updated Responses. Those Updated Responses and Exhibits contain proprietary, confidential information that would aid competitors of Windstream East and the vendor with whom it has the contract contained in the Exhibits, 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.

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 Responses 9, 15, 16, 19, 24, 31, 34, 37, 41, 46, 47, 49, 52, 53, 60, 64, 99, 100 and 108, and Attachments A-E to its Updated Responses would result in significant or irreparable harm to Windstream East and its vendor with whom it has the contract contained in the Exhibits 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.

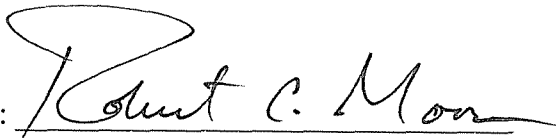
6. Windstream East seeks confidential treatment for the entirety of the Exhibits because all of the information contained in the same is highly confidential and proprietary information.

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.

Respectfully Submitted,

Date: 6/16/10

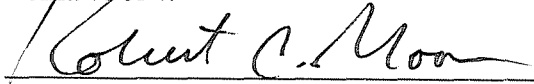
By: 

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Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 16th day of June, 2010 on Tiffany Bowman, 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 1st Street, Edmond, Oklahoma 73034.



Robert C. Moore

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 17 2010

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 UPDATED RESPONSES TO NEW
CINGULAR WIRELESS PCS, D/B/A AT&T MOBILITY'S DATA REQUESTS
TO WINDSTREAM KENTUCKY EAST, LLC, BASED ON UPDATED COST
STUDY SUBMITTED BY WINDSTREAM KENTUCKY EAST, LLC**

REDACTED VERSION

Windstream Kentucky East, LLC ("Windstream East") submits as follows in updated response to New Cingular Wireless PCS d/b/a AT&T Mobility's ("AT&T Mobility") Data Requests up to the current date to Windstream East based on the updated cost study submitted by Windstream East.

SPECIFIC UPDATED RESPONSES TO DATA REQUESTS

1. Provide a native Excel version of Windstream's cost study with no enabling of any "Protect Workbook" and "Protect Sheet".

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

2. Provide the total Windstream minutes of use (“MOUs”) for each year for the last five years (2004-2008) for the following categories used in Windstream’s cost study. Provide an explanation for any zero values.
- a. Local Terminating
 - b. Local Originating
 - c. Local Tandem Terminating
 - d. Local Tandem Originating
 - e. EAS Terminating
 - f. EAS Originating
 - g. Interstate Toll Terminating
 - h. Interstate Toll Originating
 - i. Intrastate Toll Terminating
 - j. Intrastate Toll Originating
 - k. Recip Comp Terminating
 - l. Recip Comp Originating
 - m. Host/Remote Terminating
 - n. Host/Remote Originating
 - o. LATA Tandem Terminating
 - p. LATA Tandem Originating

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

3. Provide Windstream's annual reports to shareowners for the past two years (2007-2008).

UPDATED RESPONSE: No change.

4. Provide all Windstream's Form 10-K reports submitted to the Securities and Exchange Commission ("SEC") since January 1, 2004.

UPDATED RESPONSE: No change.

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

UPDATED RESPONSE: No change.

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

UPDATED RESPONSE: No change.

7. Provide all materials Windstream has provided to financial analysts and potential investors in investor presentations since January 1, 2008.

UPDATED RESPONSE: No change.

8. Does Windstream offer Voice over Internet Protocol (“VoIP”) with its broadband services in Kentucky?
 - a. If so, please describe Windstream’s VoIP, including when Windstream began offering VoIP in Kentucky and the current number of Windstream’s VoIP subscribers in Kentucky.

UPDATED RESPONSE: No change.

9. Provide all work papers, including source documents, supporting Windstream's cost study. Work papers should include, to the extent they exist, all documentation supporting claimed equipment, material and labor costs, as well as all network measurements, such as claimed minutes of use per year, length of interoffice cables, bandwidth of interoffice transmission equipment, cost of debt, cost of equity, etc.

UPDATED RESPONSE: In addition to the information previously provided in Windstream's Responses to New Cingular Wireless PCS, D/B/A AT&T Mobility's First Data Requests, the following additional files were filed and served on May 27, 2010 with Windstream's Updated Cost Study (**Confidential treatment has been requested for the updated cost study and each of the identified attachments**). "MDF Power worksheet_2009.4.13.10 (Attachment I)", "Electronics Input_2010_KY East Revised.4.13.10 (Attachment G)", "2009 CS1500 Update.4.13.10 (Attachment A)", "IX Facilities_KY East_2009_Prices_Adj for non-IX fiber.4.13.10(Attachment B)", "Switch Replacement_2010_Update_KY219.4.13.10.xls (Attachment J)", "Switch Replacement_2010_Update_KY220.4.13.10.xls (Attachment E)", "WIN WACC_2010.4.13.10.xls (Attachment F)" (all provided electronically) and "Kentucky-Verizon Summary of Usage for Recip comp 04-05-10 (Attachment H)" (provided on disc).

Two other files were also provided that summarize the changes in the updated cost study. They were "Summary of Changes in 2010 Updated Study.4.16.10.doc (Attachment D)" and "Mapping Document for Updated Model11.4.16.10.xls (Attachment C)."

Windstream East Party Supporting the Response: David Blessing

10. Explain the distinction between “composite rate of return,” “interstate rate of return,” and “intrastate rate of return” as found on the “Cost Factors” page of Windstream’s cost study. This explanation should specify which “return” is used in developing Windstream’s recommended costs.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

11. Explain how expenses associated with service order activities have been excluded in the development of maintenance and joint factors used in Windstream's cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

12. Explain the method employed by Windstream to ensure that the costs claimed in its study are forward-looking.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

14. Explain what is meant by the description “monthly cost per minute” found on the Results page of Windstream’s cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

15. Explain the purpose of the NTS Percents found in the Input section of Windstream's cost study.

UPDATED RESPONSE: The NTS Percent inputs found in the Input section of Windstream East's cost study are used to eliminate that portion of the investment inputs which are non-traffic sensitive. The NTS percentage for end-office switching identifies the portion of end-office switching investment that is non-traffic sensitive over and above the investment associated with line ports and loop termination equipment that has already been removed. **(Confidential treatment has been requested for Windstream's cost study and updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

16. Explain whether the following components are treated as traffic-sensitive or non-traffic-sensitive in Windstream's study:
- a. Switch processor and matrix costs;
 - b. Initial software and software upgrade costs.

RESPONSE: All components listed in 16a. and 16b. are treated as _____
(Confidential information redacted) traffic-sensitive in Windstream East's updated cost study.

Windstream East Party Supporting the Response: David Blessing

17. List all “host” and all “remote” switches in Windstream’s network.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

18. State whether each remote switch listed performs a switching function for a call dialed by an end user connected to that remote switch and terminated to another end user connected to that remote switch.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

19. Provide a list, on a line-item level of detail, showing all switching investments and costs treated as non-usage-sensitive in Windstream's cost study.

UPDATED RESPONSE: The following switching investment items are treated as non-usage sensitive:

- a. LCE's, LCM's, Dwrs, & Lines (Line Port Equipment)
- b. MDF and Protector (Loop Termination Equipment)
- c. One half of Conversion Costs
- d. Portion of power equipment associated with items in (a) and (b) above.
- e. _____ . **(Confidential information redacted)**

Windstream East Party Supporting the Response: David Blessing

20. Provide the account balances for 2006, 2007 and 2008 for the accounts used to develop Windstream's proposed forward-looking common cost factor. Also, provide the equivalent account balances for the first six months of 2009.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

21. What is the vintage of the account balances in the column entitled “Embedded Kentucky East Plant” on the “Capital ACF” page in Windstream’s cost study?

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

22. Provide the account balances for 2006, 2007 and 2008 for the accounts corresponding to the rows for the column entitled “Embedded Kentucky East Plant” on the “Capital ACF” page in Windstream’s cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

23. In addition to the 2007 data found in Windstream's cost study, provide the account balances for 2006 and 2008 for the accounts associated with the "Embedded Plant Distribution" found on the "Capital ACF" page.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

24. Describe all linkages between data found in the “Transport Termination Equipment Report” and the main portion of Windstream’s cost study (pages 2-32 in the pdf file).

UPDATED RESPONSE: The calculated total at the bottom of the “Fiber Equip \$” column on the “IX Fiber Equip \$” worksheet in the “Electronics Input_2010_KY East Revised.4.13.10.xls” (See Attachment G to Updated Cost Study) file contains the material cost input entered on the “Input” tab of the updated cost model. (“Win Kentucky East_RecipComp Study_2010..4.13.10.xls”) **(Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

25. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for terminating equipment prices for Windstream Kentucky East that correspond to the "IX Electronics Prices" found on the "Electronics Prices" page in the "Transport Termination Equipment Report".

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

26. Provide a description of the specific equipment, including the identification of the hardware vendor, associated with Windstream's "IX Electronics Prices" found on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report".

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

27. Explain why the “Loop Electronic Price” is the same as the “IX Electronic Price” for each corresponding facility type as shown on the “Electronics Prices” page in Windstream’s “Transport Termination Equipment Report”.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

28. Explain the acronym “STS1” as shown on the “Electronics Prices” page in Windstream’s “Transport Termination Equipment Report”.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

29. Name and describe the network systems that are sources for the “Electronic Data” pages in Windstream’s “Transport Termination Equipment Report”.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

30. Page 51 of the pdf file containing Windstream's cost study is labeled "ATTACHMENT B, Electronics Input for Cost Study". Is this the intended description for the material found at pages 52-71? If not, please explain.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

31. Describe all linkages between data found in ATTACHMENT B and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

UPDATED RESPONSE: The calculated "Materials" column (N) on the attachment "IX Facilities_KY East_2009 Prices_Adj for non-IX fiber.4.13.10.xls" Attachment B, "IX Facilities" tab contains the material cost input entered on the "Input" tab of the updated cost model "Win Kentucky East_RecipComp Study_2010.4.13.10.xls" line 5. The "Plus Minor Materials" percent on the "Materials" column (C) on the attachment "IX Facilities_KY East_2009 Prices_Adj for non-IX fiber.4.13.10.xls" Attachment D, "IX Facilities" tab comes from the percent entered as "Other Material %" on the "Materials Factors" tab of the updated cost model "Win Kentucky East_RecipComp Study_2010.4.13.10.xls" column D for IX Transport Facility and HR Transport Facility. The "Plus Sales Tax" percent on the "Materials" column (C) on the attachment "IX Facilities_KY East_2009 Prices_Adj for non-IX fiber.4.13.10.xls" Attachment B, "IX Facilities" tab comes from the percent entered on line 89 of the "Input" tab of the updated cost model "Win Kentucky East_RecipComp Study_2010.4.13.10.xls." The Installation (Adjusted), Engineering, and Freight percents calculated under the "SumOfInstallCost" column (O) on the attachment "IX Facilities_KY East_2009 Prices_Adj for non-IX fiber.4.13.10.xls" Attachment B, "IX Facilities" tab" contains the EF&I percents entered on the "Materials Factors" tab of the updated cost model "Win Kentucky East_RecipComp Study_2010.4.13.10.xls" for IX Transport Facility and HR Transport Facility (rows 12 & 14.) **(Confidential treatment has been requested for Win Kentucky East_RecipComp Study_2010.4.13.10.xls and IX Facilities_Ky East_2009 Prices_Adj for non-IX fiber.4.13.10.xls)**

Windstream East Party Supporting the Response: David Blessing

32. Explain the meaning of each acronym found under the heading “InPlaceCode” in the “IX Facilities Detail” pages in Windstream’s ATTACHMENT B.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

33. Explain the length information found in the “IX Facilities Detail” pages in Windstream’s ATTACHMENT B. This explanation should explicitly describe how the length is calculated for each entry associated with the Albany exchange.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

34. Provide the vintage(s) of the material and install cost data found in the “IX Facilities Detail” pages in Windstream’s ATTACHMENT B.

UPDATED RESPONSE: The vintage of cost data on the “IX Facilities Detail” pages in Windstream’s ATTACHMENT B is September 2007. The install cost data found on the “IX Facilities Detail” pages in Windstream East’s ATTACHMENT B was developed based on placement costs provided in May 2007.

The IX Facilities Detail pages in Attachment B have been updated as shown in the Tab labeled “IX Facilities Detail” of the file labeled “IX_Facilities KY East_2009 Prices_Adj for non-IX fiber.4.13.10.xls.” **(See Attachment B to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)** The vintage of the data on this tab is 2009.

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.

UPDATED RESPONSE: Please see Updated Response to Data Request # 108.

Windstream East Party Supporting the Response: David Blessing

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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

37. Describe all the linkages between data found in ATTACHMENT C and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

UPDATED RESPONSE: The dollar total in cell E5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" plus the dollar total in cell E5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY220.4.13.10.xls" equals the End Office Switching amount on the "Input" tab, cell D7 of the updated cost study. **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

The dollar total in cell F5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" plus the dollar total in cell F5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY220.4.13.10.xls" equals the SS7 Signaling Switching amount on the "Input" tab, cell D8 of the updated cost study. **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

The dollar total in cell G5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" plus the dollar total in cell G5 on the "Telric Input" tab of the attachment "Switch Replacement_2010 Update_KY220.4.13.10.xls" equals the Tandem Switching amount on the "Input" tab, cell D9 of the updated cost study. **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

The percentage in cell L3 on the "Switch Costs" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" contains the Other Material percent entered in cell D8, D9, D10 and D11 on the "Material Factors" tab of the updated cost study. Similarly, the Engineering percent (cell N3) and Installation percent (cell M3) on the "Switch Costs" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" are entered in cells H8/H9 and I8/I9 respectively on the "Material Factors" tab of the updated cost study. Similarly, the Engineering percent (cell K2) and Installation percent (cell J2) on the "Tandem Costs" tab of the attachment "Switch Replacement_2010 Update_KY219.4.13.10.xls" are entered in cells H10/H11 and I10/I11 respectively on the "Materials Factors" tab of the updated cost study. (Note: these percentages are the same for both Windstream Kentucky East companies 219 and 220.) **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

- 38.** Describe all linkages between data found in ATTACHMENT D and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

UPDATED RESPONSE: See Updated Response to Data Request #37.

Windstream East Party Supporting the Response: David Blessing

39. Provide for each row found on the “Switch Costs” and “Tandem Costs” pages of Windstream’s ATTACHMENT C and ATTACHMENT D the following information:
- a. CLLI code for existing switch
 - b. Switch type for existing switch
 - c. An explanation of the modeled switch type

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

40. Provide the source file “MDF Power Transmission Worksheet.xls” mentioned in Note (1) as found on the “Switch Cost Data” pages of Windstream’s ATTACHMENT C and ATTACHMENT D.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

41. Explain why HAI 5.3 default values for the SS7 Switching and Tandem Fixed and Variable Switch costs are found on the “Switch Cost Data” pages of Windstream’s ATTACHMENT C and ATTACHMENT D are reasonable estimates to measure Windstream’s SS7 costs in Kentucky.

UPDATED RESPONSE: Windstream’s SS7 costs are no longer modeled using the HAI default values. Please see Switch updated EXCEL files: “Switch Replacement_2010 Update_KY2194.13.10.xls” and “Switch Replacement_2010 Update_KY220.4.13.10.xls.” **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

42. Describe the location of any Windstream SS7 switches and the specific vendor for each SS7 switch. In addition, if Windstream leases any SS7 services, the description should indicate how this fits into its forward-looking SS7 network.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

44. Provide a general description of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D. This description should, at a minimum, identify the modeled switch as either a circuit switch or a soft switch as well as identify the switch vendor.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

45. Provide the capacity limits of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D that are part of the technology modeling contained in Windstream's cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

46. Provide the “Analysis of all Windstream closed jobs for the year ending 12/31/06” mentioned on the last page of the “Switch Cost Data” pages of Windstream’s ATTACHMENT C and ATTACHMENT D.

UPDATED RESPONSE: Please refer to the file “DR46_Windstream Capital Loadings_COE_2006_Update.xls” attached herein as Attachment A. (**Confidential Treatment Requested**)

Windstream East Party Supporting the Response: David Blessing

47. Provide the vintage for the working lines data found on the “Tandems Switches” page of Windstream’s ATTACHMENT C.

UPDATED RESPONSE: The vintage for working lines data found on the “Tandems Switches” page of Windstream East’s switch model files “Switch Replacement_2010 Update_KY219.4.13.10.xls” and “Switch Replacement_2010 Update_KY220.4.13.10.xls” as of December 31, 2009. **(See Attachments J and E to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

48. Provide 2008 end-of-year working line counts for each switch found on the “Tandem Switches” page of Windstream’s ATTACHMENT C and ATTACHMENT D.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

49. Provide the vintage for the working lines and host lines data found on the “Host_Remote Switches” pages of Windstream’s ATTACHMENT C and ATTACHMENT D.

UPDATED RESPONSE: The vintage for working lines data found on the “Host_Remote Switches” pages of Windstream East’s switch model files “Switch Replacement_2010 Update_KY219.4.13.10.xls” and “Switch Replacement_2010 Update_KY220.4.13.10.xls” is as of December 31, 2009. **(See Attachment E and J to Updated Cost Study - Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

50. Provide 2008 end-of-year working line and host line counts for each switch found on the “Host_Remote Switches” pages of Windstream’s ATTACHMENT C and ATTACHMENT D.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

51. Please provide the number of existing softswitches Windstream has under the following circumstances:

- a. Located in Kentucky
- b. Located outside of Kentucky
- c. Located in Kentucky and interconnected with the public switched network
- d. Located outside Kentucky and interconnected with the public switched network
- e. Located in Kentucky and the same softswitch vendor and model as contained in Windstream's cost study
- f. Located outside Kentucky and the same softswitch vendor and model as contained in Windstream's cost study

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

52. Describe product management activities associated with transport and termination that are contained in the account balance for product management found in the “Common Costs” pages of Windstream’s cost study.

UPDATED RESPONSE: The company personnel performing product management activities support all revenue-generating “products” for Windstream East, including those classified as wholesale services. Transport and termination activities covered by the rates developed in this cost study are part of wholesale services. Windstream East’s cost study removes the activities directly associated with retail services. Product Management expense is completely omitted from the updated cost study. **(Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

53. Describe sales and advertising activities associated with transport and termination that are contained in the account balance for product management found in the “Common Costs” page of Windstream’s cost study.

UPDATED RESPONSE: The company personnel performing sales activities support all products and services provided by Windstream East, including those classified as wholesale services. Transport and termination activities covered by the rates developed in this cost study are part of wholesale services. Some of the advertising is not tied to a specific product but is designed to increase usage of all communications services, which indirectly affects transport and termination volumes. Windstream East’s cost study identifies and removes the sales and advertising activities directly associated with retail services. Sales and Advertising expense is completely omitted from the updated cost study. **(Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

54. Describe customer services activities associated with transport and termination that are contained in the account balance for customer services found in the “Common Costs” page of Windstream’s cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

55. Identify the portion of current investment and current expenses for switching expense as found in the “Cost Factors” page of Windstream’s cost study associated with digital circuit switching equipment and digital packet switch equipment.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

56. Identify the portion of current investment and current expenses for circuit expense as found in the “Cost Factors” page of Windstream’s cost study associated with radio systems, electronic circuit equipment and optical circuit equipment.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

57. Does Windstream currently have in its Kentucky network any of the modeled switches found in the “Switch Cost Data” pages of its cost study? If so, identify each such switch, and whether the switch performs end-office switching, tandem switching or host-remote switching functions.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

58. Explain the distinction between “working lines” and “host lines” as used in the “Host_Remote Switches” pages found in Windstream’s cost study.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

59. Identify (and locate by specific tab, column and row reference) in Windstream's cost study its proposed reciprocal compensation rates for terminating traffic originating from AT&T Mobility.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

60. Provide a 2009 demand forecast for each of the MOU traffic categories Windstream has identified in its cost study.

UPDATED RESPONSE: The 2009 demand forecast used in the Windstream East updated cost study is found on the tab labeled "Demand", rows 1-16. **(Confidential treatment has been requested for the updated cost study and each of the identified attachments)**

Windstream East Party Supporting the Response: David Blessing

61. Identify any Kentucky dockets in which Windstream has provided within the past five years any cost estimate for a usage service such as local usage, intrastate switched access, interstate switched access and reciprocal compensation. For each identified docket, please provide the following information:
- a. The name of each study containing a cost estimate for a usage service;
 - b. The month and year each study containing a cost estimate for usage service was submitted in its docket;
 - c. Windstream's public testimony, if any, describing cost study;
 - d. For each qualifying cost study, identify the cost methodology used to develop the cost estimate, *e.g.*, Total Service Long-Run Incremental Cost ("TSLRIC"), Total Element Long-Run incremental Cost ("TELRIC"), average embedded cost, etc.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

62. What percentage of traffic originated by AT&T Mobility and sent to Windstream does Windstream claim should be subject to Windstream's terminating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's terminating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If not traffic studies or other documentation is provided, explain the basis for the claimed percentages.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

63. What percentage of traffic originated by Windstream and sent to AT&T Mobility does Windstream claim should be subject to Windstream's originating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's originating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If not traffic studies or other documentation is provided, explain the basis for the claimed percentages.

UPDATED RESPONSE: No change.

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, described 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 it did not "record" the requested MOUs?

UPDATED RESPONSE:

- a. Windstream East does not record local traffic. Special usage studies are used to determine the local and EAS portion for the cost study. This usage is not standard EMI data (210 records), but in translation recordings of Pegs and CCS seconds. The data is at a trunk group level and is only identified by the trunk group number and owner. This usage is then classified by type to toll, local, or EAS. This data is not retained for any specific time period. Time period used in the study was January 2009 to June 2009. **(Confidential treatment has been requested for the updated cost study and each of the identified attachments)**
- b. See Response to Data Request #64(a).
- c. See Response to Data Request #64(a).

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.
- 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, described the usage information including its vintage and provide the most recent information retained.
 - b. Explain Windstream Kentucky east's policy for retaining MOU data.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.
- 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, please 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 cells(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

UPDATED RESPONSE: No change.

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.
- 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 the 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.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.
- a. Please describe the system that is the source of 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 the "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.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.
- a. Please describe the system that it's 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 cells(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.
- 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 First Data Request #1.

UPDATED RESPONSE: No change.

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.
- 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 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.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.
 - 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 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.

UPDATED RESPONSE: No change.

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.
- 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 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.
 - 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 those 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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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.

UPDATED RESPONSE: No change.

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 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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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 & MDACS 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".

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

- 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".

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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”.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.
- 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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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 [sic] if transport and termination associated with reciprocal compensation were not provided in Kentucky.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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 have avoided if transport and termination associated with reciprocal compensation were not provided in Kentucky.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

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.
 - 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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

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?

UPDATED RESPONSE: All portions of the Nortel CS1500 modeled switches are involved in the termination of voice traffic between wireline and wireless providers.

a) The percentage of CS1500 investment treated as non-traffic sensitive by the study is _____. (**Confidential information redacted**)

Windstream East Party Supporting the Response: David Blessing

- 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?

UPDATED RESPONSE: The Windstream East study determines the percentage of cable costs to allocate to uses other than the transport of voice traffic based on use of a historical percentage.

- a) The percentage used in the updated study is _____. (**Confidential information redacted**)

Windstream East Party Supporting the Response: David Blessing

- 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.

UPDATED RESPONSE: No change.

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, 1008 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.

UPDATED RESPONSE: No change.

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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

- 104.** Windstream Kentucky East in its response to AT&T Mobility's DR #18 that eight switches [sic] 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.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

- 105.** Based on Windstream Kentucky East's responses to AT&T Mobility's Data Requests 5 and 6, Windstream Kentucky East has not provided balance sheet statements for 2006, 2007 and 2008 apparently because these statements have not been filed with the Kentucky Public Service Commission or the Federal Communications Commission. Please provide Windstream Kentucky East's balance sheet statements for 2006, 2007, 2008 and 2009 at the greatest level of detail available and at least at the account level as found in Schedule III as filed recently by other incumbent local exchange carriers ("ILECs") with the Kentucky Public Service Commission. Note that for plant accounts, Schedule III provides beginning balances, additions, retirements, transfers and ending balances. Since ILECs file two versions of balance sheet statements (total company and Kentucky operations only) with the Kentucky Public Service Commission, Windstream Kentucky East should provide both versions, if different. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

- 106.** Based on Windstream Kentucky East's responses to AT&T Mobility's Data Requests 5 and 6, Windstream Kentucky East has not provided income statements for 2006, 2007 and 2008 apparently because these statements have not been filed with the Kentucky Public Service Commission or the Federal Communications Commission. Please provide Windstream Kentucky East's income statements for 2006, 2007, 2008 and 2009 at the greatest level of detail available and at least at the account level as found in Schedule VI as filed recently by other incumbent local exchange carriers ("ILECs") with the Kentucky Public Service Commission. Since Schedule VI contains employee counts and total compensation for employees, provide this information as well for 2006, 2007, 2008 and 2009. Since ILECs file two versions of income statements (total company and Kentucky operations only) with the Kentucky Public Service Commission, Windstream Kentucky East should provide both versions, if different. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

- 107.** If not provided in response to AT&T Mobility Data Request 106, please provide Rent Revenue (Account 5240) for 2006, 2007, 2008 and 2009. If available, separately identify the portion attributable to conduits and poles. On the other hand, if Rent Revenue separately attributable to conduits and poles is unavailable, provide 2008 “Equivalent Number of Poles,” “Conduit System-Trench Kilometers,” and “Conduit System-Duct Kilometers” using definitions consistent with the 2007 instructions for the FCC’s ARMIS Report 43-08. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

UPDATED RESPONSE: No change.

Windstream East Party Supporting the Response: David Blessing

108. The contract provided by Windstream Kentucky East on December 30, 2009 to AT&T Mobility's Data Request 35 appears to have expired.
- (a) Confirm or deny that this contract is the most recent contract for material costs associated with Windstream's IX facilities in Kentucky. If denied, provide the most recent contract.
 - (b) Confirm or deny the "new cost" prices found in Exhibit 2 of this contract support pricing information found within the "'Components List" tab in "Inplace Price Book_2007 update.xls," which was provided as part of Exhibit B to Windstream's response to AT&T Mobility's Data Request 9. If denied, provide the contracts or applicable price quotes that support the pricing information found within the "Components List" tab.

UPDATED RESPONSE: Fiber pricing used on the "Components List" tab in fiber pricing used on the "Components List" tab in "InPlace Price Book_2009 Update.xls" can be obtained from Attachment C "DR108b_Superior Essex fiber pricing_May 2009.xls".
_____. **(Confidential information redacted)**

Copper pricing used on the "Component List" tab in "InPlace Price Book_2009 Update.xls" can be obtained from Attachments D and E "DR108b_Superior Essex copper pricing_May 2009.xls" and "DR108b_General Cable copper pricing_May 1 2009.xls".
_____. **(Confidential information redacted)**

Windstream East Party Supporting the Response: David Blessing

Respectfully Submitted,

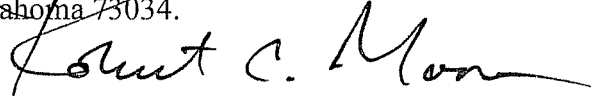
Date: _____

By: _____
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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 16th day of June, 2010 on Tiffany Bowman, 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 1st Street, Edmond, Oklahoma 73034.

A handwritten signature in black ink that reads "Robert C. Moore". The signature is written in a cursive style and is positioned above a horizontal line.

Robert C. Moore

ATTACHMENT A
DR46_Windstream Capital Loadings_COE_2006_Update.xls

REDACTED

ATTACHMENT B
Inplace Price Book_2009.Update.xls

REDACTED.

ATTACHMENT C
DR108b.Superior Essex fiber pricing_May 2009.xls

REDACTED

ATTACHMENT D
DR 108b.Superior Essex copper pricing_May 2009.xls

REDACTED

ATTACHMENT E
DR 108b_GENERAL CABLE copper pricing_May 1 2009.xls

REDACTED