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September 16, 2010

RECEIVED

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**PUBLIC SERVICE
COMMISSION**

VIA OVERNIGHT MAIL

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: Petition of Windstream Kentucky East, LLC, for Arbitration of an
Interconnection Agreement With New Cingular Wireless PCS, d/b/a AT&T
Mobility
KPSC 2009-00246

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of AT&T Mobility's Responses to Windstream's Supplemental Data Requests and Supplemental Requests for Admission dated August 17, 2010.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

850133

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 16th day of September 2010.

Honorable Robert C. Moore
Attorney At Law
Hazelrigg & Cox, LLP
415 West Main Street
P.O. Box 676
Frankfort, KY 40602

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


Mary K. Keyer

Data Requests

REQUEST: Provide all work papers, including source documents, supporting AT&T's traffic study provided to Windstream East. Work papers should include, to the extent they exist, all documentation supporting cell site locations, how data was separated between Windstream East-originated and AT&T-originated, how a Windstream East-originated call was determined to terminate within the MTA in which it was originated, how a Windstream East-originated call was determined to terminate outside the MTA in which it was originated, etc.

RESPONSE: AT&T Mobility's traffic study was created by examining "raw" call detail record ("CDR") data through the use of specialized software. Consequently, no "work papers," as such, exist. AT&T Mobility has previously produced to Windstream all of the CDRs used in compiling the study, as well as the spreadsheet that shows the study results. Below, AT&T Mobility will respond to the specific issues raised in DR-1.

A. All documentation supporting cell site locations:

The locations of AT&T Mobility's cell sites are proprietary and highly confidential - - both for competitive and national security reasons. Below, AT&T Mobility will describe how the MTA locations of its cell sites were determined, but AT&T Mobility objects to producing to Windstream the actual cell site locations by state and county.

B. How data was separated between Windstream East-originated and AT&T-originated:

AT&T Mobility's traffic study used LERG data from Telcordia to separate Windstream and AT&T Mobility CDRs. More specifically, through the LERG, AT&T Mobility identified all numbers assigned to Windstream Kentucky East and to AT&T Mobility. For the study period, AT&T Mobility then examined all CDRS created by all AT&T Mobility switches and identified all records in which the calling party's number was assigned to either AT&T Mobility or Windstream Kentucky East, and the called party's number was assigned to the other company.

C. How a Windstream East-originated call was determined to terminate within the MTA in which it was originated:

AT&T Mobility's CDRs contain a data field labeled "First CGI," which identifies the first cell site involved at the beginning of a call – both land-to-mobile and mobile-to-land. AT&T Mobility has created data tables containing the location of every AT&T Mobility cell site by county and state. In producing its traffic study, AT&T Mobility identified the "First CGI" of all calls originated by a Windstream subscriber, dialed to a local number (as shown in the LERG) assigned to an AT&T subscriber. The AT&T Mobility study then identified the MTA location of the originating Windstream wire center for all such calls, using data from the LERG. AT&T Mobility then determined the MTA location of the first cell site by comparing the state and county location of the first cell site for each record to public data from the FCC, identifying the MTA location of each county in each state in the U.S. CDRs in which the MTA location of the originating Windstream East wire center matched the MTA location of the first cell site at the beginning of the call were selected as intraMTA calls meeting the study criteria.

D. How a Windstream East-originated call was determined to terminate outside the MTA in which it was originated:

The same procedure was used as described in the response to subpart C above, except the search was conducted for calls that terminated to a first cell site located in a different MTA than the originating Windstream East wire center.

REQUEST: In regards to the text files provided to Windstream East by AT&T in support of the traffic study, detail and define with specificity any and all column headings, including, but not limited to:

- a. DATESTARTOFCHARGING
- b. RECORDTYPE
- c. SUBSTR(A_MSISDN, 2, 6)
- d. SUBSTR(B_MSISDN, 2, 6)
- e. FIRSTCGI
- f. CHARGEABLEDURATION
- g. LANDLINE_MTA
- h. LANDLINE STATE
- i. LAND LINE OCN
- j. LANDLINE OCN NAME
- k. LAND LINE RATE CENTER
- l. ATT MTA
- m. ATT STATE
- n. ATT NAME
- o. ATT OCN
- p. ATT_OCN_NAME
- q. ATT_RATECENTER
- r. CGI MTA
- s. Col STATE
- t. Col COUNTY
- u. RATECENTER MATCH

RESPONSE:

- a. DATESTARTOFCHARGING – Date and time of call when charging starts. If a call is answered this is the answer time; otherwise, it is the channel allocation time.
- b. RECORDTYPE – Record type (1 = mobile originated, 4 = mobile terminated).
 - Mobile Originated –owner of the record is in the caller position.
 - Mobile Terminated–owner of the record is in the called position.

- c. SUBSTR (A_MSISDN, 2, 6) - Calling number (11-digit number (1+10 digit); AT&T Mobility considers the 2nd position to the 6th position of the calling number to get the NPA-NXX).
- d. SUBSTR (B_MSISDN, 2, 6) - Called number (11-digit number (1+10digit); AT&T Mobility considers the 2nd position to the 6th position of the called number to get the NPA-NXX).
- e. FIRSTCGI – Starting Cell identifier (NC-LAC-CID)
 - NC = first 2 digits of 3-digit Network Code (*i.e.*, 410 is 41 for AT&T);
 - LAC =Location area code;
 - CID = first 4 digits are the cell and the last digit is the decimal representation of alpha sector designation.
- f. CHARGEABLEDURATION – Seconds from answer to call termination.
- g. LANDLINE_MTA – MTA of landline number according to the LERG.
- h. LANDLINE_STATE – State of landline number according to the LERG.
- i. LANDLINE_OCN – OCN of landline number according to the LERG.
- j. LANDLINE_OCN_NAME - Name of landline OCN according to the LERG.
- k. LANDLINE_RATECENTER – Landline ratecenter according to the LERG.
- l. ATT_MTA – MTA of AT&T Mobility number according to the LERG.
- m. ATT_STATE – State of AT&T Mobility number according to the LERG.

- n. ATT_NAME – This field was not part of initial script.
- o. ATT_OCN – OCN of AT&T Mobility number according to the LERG.
- p. ATT_OCN_NAME – Name of AT&T Mobility OCN according to the LERG.
- q. ATT_RATECENTER – Ratecenter of AT&T Mobility number according to the LERG.
- r. CGI_MTA – MTA of first cell site according to State and County match with FCC State-County Mapping.
- s. CGI_STATE – State of first cell site.
- t. CGI_COUNTY – County of first cell site.
- u. RATECENTER_MATCH - 1 if ratecenter match; 0 if not matched.

REQUEST: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine if a particular call was originated by a Windstream East end user.

RESPONSE: If a Windstream East subscriber calls an AT&T Mobility subscriber, the AT&T Mobility network will receive a Mobile Terminating ("MT") record of the event (as long as the AT&T Mobility subscriber is not roaming on another network). AT&T Mobility analyzed the calling number on the MT record to determine if the calling number is from a Windstream East subscriber. Windstream East subscriber numbers (NPA-NXX-LINE) were collected from the LERG. The program used to analyze AT&T Mobility's CDRs was Oracle.

REQUEST: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine in which MTA calls originate.

RESPONSE: See Response to DR-1. The software used to conduct the traffic study was Oracle.

REQUEST: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine in which MTA calls terminate.

RESPONSE: See Response to DR-1. The software used to conduct the traffic study was Oracle.

REQUEST: Regarding the calls that AT&T has identified in its traffic study as being originated by Windstream East, are the calls limited to only seven digit dialed calls or ten digit dialed calls, i. e., not 1 + dialed calls?

RESPONSE: The traffic study included all the CDRs for calls terminated on the AT&T Mobility network where the calling number is a Windstream East number from the LERG. Thus, the traffic study was not limited to seven-digit dialed or 10-digit dialed calls.

REQUEST: Identify the trunk group(s), circuit ID(s), and Windstream East end office/tandem(s) associated with the trunk group(s) that were used to record the traffic included in the traffic study provided to Windstream East.

RESPONSE: This traffic study was not done by analyzing traffic on specific trunk groups. The study examined all CDRs generated by all AT&T Mobility switches for the study period, regardless of routing or trunks groups.

REQUEST: Identify in detail each and every person (including but not limited to name, title, area of responsibility and name of employer) that was involved in the production, review, analysis, or any other aspect of the traffic study provided to Windstream East.

RESPONSE:

Venkat Gadwal: Senior RAN Engineer, Network Planning and Engineering, AT&T Mobility.

Dave Hooser: Professional RAN Engineer, Network Planning and Engineering, AT&T Mobility.

Ching-Fang Wang: Area manager RAN Engineering, Network Planning and Engineering, AT&T Mobility.

Paul Walters: External Counsel.

Mary Keyer: General Attorney, Legal, AT&T Kentucky.

REQUEST: Please identify "LGR", who is listed as the provider of the data in the traffic study provided to Windstream East.

RESPONSE: LGR is LGR Telecommunications, a contractor to AT&T Mobility.

REQUEST: Please identify how LGR obtained the data included in the traffic study provided to Windstream East.

RESPONSE: LGR obtained all the CDRs from AT&T Mobility, then parsed and loaded the data into an Oracle database.

REQUEST: Please identify "CSS", who is listed as the provider of the cell site information in the traffic study provided to Windstream East.

RESPONSE: CSS or Compass System is the central repository for all AT&T Mobility cell site information. CSS obtains cell site information by input from various sources, including implementation vendors and local RF engineers.

REQUEST: Please identify how CSS obtained the cell site information included in the traffic study provided to Windstream East.

RESPONSE: See response to DR 11.

Requests for Admission

REQUEST: Please admit that AT&T included only calls originated by Windstream East end users in the traffic study provided to Windstream East.

RESPONSE: AT&T Mobility's study used Windstream OCNs to get line ranges and NPA/NXX numbers from the LERG, then used this information to get all CDRs from the CDR database to pull calls originated from those numbers. If any of those numbers had been ported to another carrier, AT&T Mobility's study would have included some calls originated by end users of a carrier other than Windstream. As AT&T Mobility previously explained to Windstream, the traffic study thus does not account for portability of Windstream numbers, because AT&T Mobility does not have access to that data. As AT&T Mobility also previously explained to Windstream, if Windstream would provide a table showing in-ported and out-ported Windstream numbers for the study period, AT&T Mobility could re-run the study to account for portability on Windstream's side.

REQUEST: Please admit that, although LERG may identify one particular block of numbers as belonging to Windstream East, because of local number portability any given number within that block may actually be being used by another carrier other than Windstream East.

RESPONSE: Admitted.

REQUEST: Please admit that Windstream East identified the following items as being required for a valid traffic study to be conducted by AT&T:

- a. Originating NPA/NXX/line number
- b. Terminating NPA/NXX/line number
- c. Call duration
- d. Date and time of call
- e. For calls terminated to AT&T customers on AT&T's network, the last cell site
- f. For calls terminated to AT&T customers on other CMRS providers' networks, the last cell site
- g. Detail regarding the location of any and all cell sites used in the transmission of the calls
- h. Study must encompass at least 7 consecutive days without holidays or other anomalies that might skew the traffic study
- i. Any and all work papers used in the development of the traffic study
- j. Identification of all personnel participating in the development of the traffic study
- k. All calls to AT&T NPA/NXX/line numbers associated with the MTA that originate from Windstream East NPA/NXX/line numbers associated with the same MTA
- l. Local routing number

RESPONSE: Admitted that in an e-mail dated July 13, 2010, counsel for Windstream submitted the above list to counsel for AT&T Mobility with the following explanation:

"Windstream does not want to review AT&T Mobility's list of our local numbers assigned to AT&T Mobility customers prior to the running of the traffic study. However, it may be helpful to AT&T Mobility to know that Windstream suggests that the following items should be included in the traffic study. Please note that inclusion of these items does not guarantee that Windstream is automatically accepting the traffic study: Windstream reserves the rights to submit discovery, take depositions and take any other appropriate action it feels necessary regarding the traffic study."

REQUEST: Please admit that AT&T provided originating NPA/NXX but not line numbers in the traffic study provided to Windstream East.

RESPONSE: Admitted. As was previously explained to Windstream, the line numbers were omitted to avoid a violation of federal CPNI rules.

REQUEST: Please admit that AT&T provided terminating NPA/NXX but not line numbers in the traffic study provided to Windstream East.

RESPONSE: Admitted. As was previously explained to Windstream, the line numbers were omitted to avoid a violation of federal CPNI rules.

REQUEST: Please admit that Local Number Portability allows for an individual telephone number to be moved/ported from one carrier to another.

RESPONSE: Admitted.

REQUEST: Please admit that the AT&T traffic study provided to Windstream East does not include calls terminated to AT&T customers who are roaming on other CMRS providers' networks.

RESPONSE: Admitted. As was previously explained to Windstream, AT&T Mobility does not have access to call records of other carriers.

REQUEST: Please admit that AT&T has not provided details regarding the location of any and all cell sites used in the transmission of the calls in the traffic study provided to Windstream East.

RESPONSE: Denied. AT&T Mobility's traffic study identifies the MTA locations of AT&T Mobility cell sites.

REQUEST: Please admit that AT&T has not provided any or all work papers used in the development of the traffic study provided to Windstream East.

RESPONSE: Denied. Prior to Windstream's submission of formal discovery, AT&T Mobility provided to Windstream an electronic copy of the traffic study, plus all underlying raw data collected during the study. Because the study involved analysis of the raw data by a computer program, there are no hard-copy "work papers," as such. The only other item used in the study is the code written for the analysis of the raw data. The code is proprietary and, by itself, meaningless. Nevertheless, if Windstream indicates that it wants the code, AT&T Mobility will produce it subject to appropriate confidentiality protection.

REQUEST: Please admit that AT&T has not included the local routing number of the calls in the traffic study provided to Windstream East.

RESPONSE: Admitted. AT&T Mobility currently does not have access to this information in the CDR data.

REQUEST: Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, a call from a Windstream East customer with, for example, a Lexington, KY rate-centered number to an AT&T customer with a Lexington, KY rate-centered number should be delivered by Windstream East to AT&T in KY over the interconnection facilities in place between the companies.

RESPONSE: Denied.

REQUEST: Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, a call from an AT&T customer with, for example, a Lexington, KY rate-centered number to a Windstream East customer with a Lexington, KY rate-centered number should be delivered by AT&T to Windstream East in KY over the interconnection facilities in place between the companies.

RESPONSE: Denied.

REQUEST: Please refer to the call identified in RFA No. 11. Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, Windstream East should deliver the call to AT&T over the interconnection facilities in place between the companies regardless of whether the AT&T customer is in Lexington, KY, New York, NY or any other location.

RESPONSE: Denied.

REQUEST: Please refer to the call identified in RFA No. 11. Please admit that it is AT&T's responsibility to deliver the call from the point where Windstream East hands the call to AT&T to the AT&T end user.

RESPONSE: Admitted that if the AT&T end user's handset is connected to AT&T Mobility's network when the call is placed, AT&T Mobility will deliver the call, through its own network and, in some cases, the network of its interexchange carrier affiliate, to the end user's handset. If the end user is roaming on the network of another CMRS provider, and if AT&T Mobility has a roaming agreement with that carrier, AT&T Mobility will transfer the call to the other CMRS provider, which will then deliver the call, on its own network, to the AT&T Mobility end user. If the AT&T Mobility end user is not connected to AT&T Mobility's network or the network of a roaming partner, either because the handset is turned off or out of range, then the call will not complete.