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November 1, 2010

VIA OVERNIGHT MAIL

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

RECEIVED

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PUBLIC SERVICE
COMMISSION

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 Additional Response to Windstream's Reply to AT&T
Mobility's Response to Windstream's Motion to Compel.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Parties of Record

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

THE PETITION OF WINDSTREAM)	
KENTUCKY EAST, LLC FOR ARBITRATION)	CASE NO.
OF AN INTERCONNECTION AGREEMENT)	2009-00246
WITH NEW CINGULAR WIRELESS PCS, LLC)	
D/B/A/ AT&T MOBILITY PURSUANT TO)	
SECTION 252 OF THE TELECOMMUNICATIONS)	
ACT OF 1996)	

AT&T MOBILITY'S ADDITIONAL RESPONSE TO
WINDSTREAM'S REPLY TO AT&T MOBILITY'S
RESPONSE TO WINDSTREAM'S MOTION TO COMPEL

New Cingular Wireless PCS, LLC and its wireless operating affiliates ("AT&T Mobility") file this Additional Response to the Reply filed by Windstream Kentucky East ("Windstream East") to clarify the following points made by Windstream East in its Reply. AT&T Mobility communicated the information below to Windstream East before Windstream East filed its Reply.

1. Windstream East's Customer Data Base: In response to AT&T Mobility's suggestion that landline number portability could be captured in the subject traffic study if Windstream East would provide a list of working telephone numbers for the period surveyed by the traffic study, Windstream East states that its customer data base no longer includes working telephone numbers for the period covered by the traffic study. As was communicated to Windstream East, AT&T Mobility offered and is more than willing to conduct another traffic study for a period for which Windstream East's customer data base includes current working telephone numbers.

2. AT&T Mobility's SS7 Information: In lieu of using Windstream East's working telephone numbers as a method to deal with number portability, a method that AT&T Mobility has successfully used in the past with other landline carriers, Windstream East suggests that AT&T Mobility provide "SS7 Information" for the period covered by the traffic study period. As AT&T Mobility informed Windstream East, AT&T Mobility has no method of capturing SS7 data -- signaling used for call set-up -- in a format that can be subsequently used in a traffic study. All of AT&T Mobility's traffic studies are conducted with Call Detail Records generated by AT&T Mobility's switches and these have been provided to Windstream East. The simple fact is, if the Commission were to require AT&T Mobility to produce "SS7 Information," as requested by Windstream East, AT&T Mobility could not do so.

3. Rate Centers for Cell Towers: Windstream East proposes that AT&T Mobility provide "the rate center for the cell towers in the traffic study" as a means of allowing Windstream East to validate if AT&T Mobility has correctly identified the MTA locations of those cell towers. As AT&T Mobility has informed Windstream East, the concept of "Rate Center" has no meaning in the wireless world; it is purely and exclusively a landline concept. AT&T Mobility does not identify the location of its cell towers by landline rate centers and is not aware of any data base available that makes such identification. As in the case of "SS7 Information," if the Commission were to order AT&T Mobility to identify the location of its cell towers by landline rate centers, AT&T Mobility could not do so. AT&T Mobility has previously offered to provide the location of cell towers by city, without the specific street address. Such information can be used to

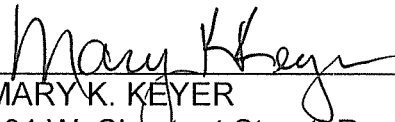
determine the MTA location of each cell tower, thereby verifying AT&T Mobility's traffic study.

4. NRTRDE Records: Windstream East claims that AT&T Mobility owes compensation to Windstream East for Windstream East-originated traffic terminating on the network of other wireless carriers, and requests that AT&T Mobility produce the NRTRDE records used by wireless companies to compile retail bills for roaming traffic. In making this request, Windstream East states that it is "willing to consider 100% of the traffic covered by those records as being interMTA traffic." AT&T Mobility will not agree to such a stipulation. It is rather more likely that roaming traffic, like wireless traffic in general, occurs mostly within the same MTA. The NRTRDE records, as AT&T Mobility has previously informed Windstream East, do not contain any information that identifies the MTA location of cell sites at the beginning of the call -- the information necessary to determine the jurisdiction of wireless traffic. Thus, the records are irrelevant for jurisdictional purposes. The records are also irrelevant because AT&T Mobility cannot be held liable to pay termination charges for traffic terminating on other carriers' networks. Additionally, the records would not necessarily be complete, because AT&T Mobility does not have NRTRDE agreements with all carriers on whose networks AT&T Mobility's customer may roam.

Finally, if the Commission were to require AT&T Mobility to produce whatever NRTRDE records do exist, AT&T Mobility would require a data set of Windstream subscribers' working telephone numbers for the traffic study period. This would be the only method by which AT&T Mobility could identify calls placed from Windstream

subscribers. Windstream, however, has already stated that it cannot produce a list of working telephone numbers for the study period.

Respectfully submitted,


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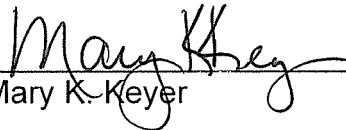
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CERTIFICATE OF SERVICE – KPSC 2009-00246

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 1st day of November 2010.

Honorable Robert C. Moore
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