



# KENTUCKY STATE AFL-CIO

676 COMANCHE TRAIL, SUITE 1 • FRANKFORT, KY 40601

Phone: 502-696-9002 • Fax: 502-696-9030

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December 3, 2014

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Honorable David L. Armstrong, Chairman  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

PUBLIC SERVICE  
COMMISSION

Case No. 2014-00283. In the Matter of Application of Windstream Kentucky East, LLC and  
Windstream Kentucky West, LLC

Dear Chairman Armstrong:

The Commission is currently reviewing the Windstream application for approval to transfer its "real estate" assets including all poles, conduits, wires, cables, and associated hardware of the Kentucky incumbent local exchange carriers into a Real Estate Investment Trust, or REIT. Windstream will then lease back those assets to operate its telecommunications networks.

The Communications Workers of America (CWA) represents about 250 Windstream employees in Kentucky. I am aware that CWA has intervened in the aforementioned proceeding. CWA is concerned that this complex, unprecedented transaction could have a negative impact on the financial and operational strength of Windstream in Kentucky and adversely impact employment opportunities of CWA members. CWA has raised serious issues about the impact of this transaction on the ability of their members to provide safe and quality service to Windstream customers.

I also understand that Windstream has not yet provided a final copy of all transaction-related documents to the Commission, including the final version of the lease agreement. Windstream has not made any commitment to expand and improve its telecommunications networks in Kentucky as a result of this transaction. Nor has Windstream made any commitments to grow career jobs as a result of this transaction.

I attended the hearing regarding this transaction held by the Commission on November 13, 2014, and was surprised by the failure of the witness for Windstream to even mention "employees" as one of Windstream's important stakeholders in this transaction. The Kentucky State AFL-CIO urges the Commission to conduct a thorough investigation of the proposed transaction to ensure that consumers and employees receive concrete benefits. The Commission should not approve the Application until it has received answers to all the questions raised by CWA and until Commission staff has had an opportunity to conduct a thorough review of all relevant documents, including the final lease agreement, and has received concrete commitments from Windstream to increase investment and grow career jobs in Kentucky.

Sincerely,

William J. Londrigan, President

cc: Vice-Chairman James W. Gardner  
Commissioner Linda K. Breathitt

Mark R. Overstreet  
R. Benjamin Crittenden  
Stites & Harbison PLLC  
421 W. Main Street  
P. O. Box 634  
Frankfort, KY 40602-0634

Cesar Caballero  
Senior Regulatory Counsel  
Windstream Communications  
4001 Rodney Parham Road  
Little Rock, AR 72212

Jeanne Shearer  
Windstream Kentucky East, LLC  
130 W. New Circle Rd., Ste. 170  
Lexington, KY 40505

Douglas F. Brent  
Stoll Keenon Ogden  
2000 PNC Plaza  
500 W. Jefferson Street  
Louisville, KY 40202-2828

Gardner F. Gillespie  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Ave. N.W., Ste. 100  
Washington, D.C. 2006-6801