

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

HYPERACTION CONNECTION, INC.)	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2003-00073
)	
ALLTEL COMMUNICATIONS, INC.)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO KENTUCKY ALLTEL, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests that Kentucky ALLTEL, Inc. (ALLTEL) file the original and four copies of the following information within 10 days of the date of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. ALLTEL has denied financial responsibility arising from any errors in billing that occurred prior to August 1, 2002. Provide the portion of the purchase agreement between ALLTEL and Verizon that absolves ALLTEL from financial responsibility.

2. Provide a tariff reference for each billed item relating to the Digital Channel Service (DCS) elements billed to Hyperaction Connection, Inc. (Hyperaction).

3. What is required by Verizon to disconnect a T1 circuit?

4. Are multiple account disconnect forms required?

5. Were the two accounts that remained open and billed to Hyperaction, either separately or combined, capable of being combined to provide telecommunications service to the public, e.g., channelized T1s?

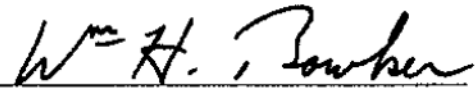
6. If multiple disconnects are required, why was Hyperaction left with the impression that it had successfully completed the process of converting five T1 DCS trunks into six CyberDS1 circuits?

7. Was a final disconnect notice sent to Hyperaction? If yes, provide a copy of the notice.

8. On November 7, 1999, Hyperaction received a bill that did not include in whole or in part -- T1 DSC charges. Why would they show up on a future bill? Explain the billing irregularities.

9. Kathy Taylor sent an e-mail to Tammy Ryder, with copies to Karen Cunningham, Stephen Price and Todd Hamilton, on December 12, 2002 (Exhibit F of the Complaint). Identify those persons, their employer, and job titles.

10. Ms. Taylor authorizes a credit for \$8,347.40 and acknowledges that he should not have been billed for these charges. Provide an explanation for issuance of a credit to the account. Include the billing details that constitute the \$8,347.40 refund.



William H. Bowker
Deputy Executive Director
Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

DATED: September 17, 2003

cc: Parties of Record

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