

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AMERICAN FEDERATION OF STATE,)	
COUNTY, MUNICIPAL EMPLOYEES)	
COUNCIL 62 (AFSME COUNCIL 62))	
)	
COMPLAINANT)	
)	
v.)	CASE NO. 2004-00250
)	
AT&T COMMUNICATIONS OF THE)	
SOUTH CENTRAL STATES, LLC)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST TO
AMERICAN FEDERATION OF STATE, COUNTY,
MUNICIPAL EMPLOYEES COUNCIL 62

Pursuant to 807 KAR 5:001, Commission Staff requests that the American Federation of State, County, Municipal Employees Council 62 ("AFSME") 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. Provide copies of the billing from AT&T Communications for the South Central States, LLC for each month in dispute (September 2003 through March 2004).
2. Provide the date(s) when AFSME moved locations.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED: October 20, 2004

cc: Parties of Record