

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC )  
DISPUTE BETWEEN WINDSTREAM )  
KENTUCKY EAST, LLC, BRANDENBURG ) CASE NO. 2008-00203  
TELEPHONE COMPANY AND MCIMETRO )  
ACCESS TRANSMISSION SERVICES, LLC )  
D/B/A VERIZON ACCESS )

COMMISSION STAFF'S DATA REQUEST TO  
WINDSTREAM KENTUCKY EAST, LLC,  
BRANDENBURG TELEPHONE COMPANY, AND  
MCIMETRO ACCESS TRANSMISSION SERVICES, LLC  
D/B/A VERIZON ACCESS

Windstream Kentucky East, LLC ("Windstream"), Brandenburg Telephone Company ("Brandenburg"), and MCIMetro Access Transmission Services, LLC d/b/a Verizon Access ("Verizon"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 5 copies of the following information, with a copy to each party of record. The information requested herein is due on or before July 31, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the

response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Windstream, Brandenburg, and Verizon shall make timely amendment to any prior responses if the companies obtain information which indicates that the responses were incorrect when made or, though correct when made, are now incorrect in any material respect. For any requests to which Windstream, Brandenburg, and Verizon fail to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for the failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

#### QUESTIONS FOR WINDSTREAM

1. Refer to paragraph 12 of the Motion for Emergency Hearing for July 9, 2008.
  - a. Explain how Windstream arrived at the calculated figures of \$252,473 and \$9,209, as damages and interest, respectively.
  - b. Provide documentation supporting those calculated figures of \$252,473 and \$9,209, as damages and interest.
  - c. Explain how Windstream arrived at the proposed estimated rate of \$500 per day plus interest for “[continued] unauthorized routing.”

d. Provide documentation supporting the proposed estimated rate of \$500 per day plus interest.

2. Describe in detail how the traffic in question is being routed to Windstream and when it is received by Windstream. Provide a narrative and diagram.

a. Explain how the traffic in question is then routed to Verizon after being received from Brandenburg. Provide a narrative and diagram.

b. Has the traffic in question been routed in this same manner since 2005?

c. If no, describe in detail how the traffic routing patterns differed prior to 2005.

3. Provide a copy of the applicable section of the Local Exchange Routing Guide or other documentation on which Windstream relies to determine that the traffic in question, as received from Brandenburg, should not be routed to Windstream in Elizabethtown.

4. Provide a copy of the current Extended Area Service agreement between Windstream and Brandenburg.

#### QUESTIONS FOR BRANDENBURG

1. Provide a copy of the applicable section of the Local Exchange Routing Guide or other documentation on which Brandenburg relies to determine that the traffic in question should be routed to Windstream in Elizabethtown.

2. What is the appropriate compensation to be paid for this traffic?

3. Provide a copy of the current Extended Area Service agreement between Windstream and Brandenburg.

QUESTIONS FOR VERIZON

1. List the NPA-NXXs being used by the Verizon-America Online customers within the Brandenburg local calling territory.
2. When a Brandenburg customer calls one of these numbers, where is the call terminated?
3. What is the appropriate compensation to be paid to Windstream for carrying this traffic?
4. Does Verizon have any facilities that terminate or interconnect to a Brandenburg central office?
5. Does Verizon have any facilities that terminate or interconnect to a Windstream central office in Elizabethtown?

  
Stephanie Stumbo  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: July 17, 2008

cc: Parties of Record