

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE)	
ARRANGEMENTS BY TELECOMMUNICATIONS)	CASE NO.
CARRIERS IN KENTUCKY)	2002-00456

**DATA REQUESTS OF CINCINNATI BELL TELEPHONE COMPANY
DIRECTED TO SPECIFIED PARTIES**

In the Commission's original Order dated December 19, 2002, the Commission set forth a Procedural Schedule for this proceeding authorizing parties to submit Data Requests to other parties on or before March 26, 2003. By its Order dated January 28, 2003, the Commission modified the Procedural Schedule, and Data Requests are now to be submitted to other parties no later than April 3, 2003.

In footnote 1 to its December 19, 2002 Order, the Commission noted that a copy of the Order initiating the proceeding was "sent to all ILECs and CLECs authorized to serve customers in Kentucky." The Commission went on to state that the service list attached to the Order as Appendix A identified the "CLECs that regularly participate in Commission proceedings." While the Commission noted that entities not on the original service list could request to become added to the service list, the Commission clearly stated that "all incumbent local exchange carries ("ILECs") and those competitive local exchange carries ("CLECs") that are active before this Commission are hereby made parties hereto."

The Cincinnati Bell Telephone Company ("CBT") has a number of CLECs in its operating territory. The four (4) CLECs which have the greatest business involvement include the following: NuVox Communications, Inc. ("NuVox"); ICG Telecom Group, Inc. ("ICG");

MCIMetro Access Transmission Services, LLC (“MCI”); and Time Warner Telecom, L.P. (“Time Warner”). CBT notes that only ICG and MCI were on the original service list. Based on the original Order commencing this proceeding, however, NuVox and Time Warner are also parties to this proceeding.

Attached hereto as Exhibit A are the Data Requests submitted to NuVox, ICG, MCI and Time Warner. Pursuant to the Commission’s Procedural Schedule these parties are required to submit answers to the Data Requests on or before April 15, 2003.

Respectfully submitted

/s/ Ann Jouett Kinney
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EXHIBIT “A”

DATA REQUESTS DIRECTED TO SPECIFIED PARTIES

Cincinnati Bell Telephone Company (“CBT”) directs the following Data Requests to the parties identified below:

Ed Cadieux
NuVox Communications, Inc.
16090 Swingly Ridge Road, Suite 500
Chesterfield, Missouri 63017

Pamela Sherwood
Time Warner Telecom, L.P.
4625 West 86th Street, Suite 500
Indianapolis, IN 46268

Executive Vice President Government
and External Affairs
ICG Telecom Group, Inc.
161 Inverness Drive West
Inglewood, Colorado 80112

Murray Barr
ICG Telecom Group, Inc.
180 Grand Avenue, Suite 450
Oakland, CA 94612

Melissa Burris
MCIMetro Access Transmission Services LLC
Concourse Corporate Center Six
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328

Susan Berlin
MCI Telecommunications
Concourse Corporate Center Six
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328

1. CBT operates in Boone, Kenton, Campbell, Gallatin, Pendleton, and Grant Counties of Northern Kentucky. In which of these counties do you have authority to operate?
2. In which of the six (6) counties identified in Data Request No. 1 do you presently have customers?
3. Do you have tariffs on file with the Public Service Commission of Kentucky (“PSCCK”)? If so, please identify the tariffs that you have on file, the date on which the tariffs were first filed, and the date on which the tariffs were last amended.
4. Since you began operations and offering service in one or more of the six (6) counties identified in Data Request No. 1, have you offered one or more services set forth in your filed tariffs at a price less than the price for such service(s) set forth in your tariffs? If so, on how many occasions have you offered service(s) at a price below the price set forth in your tariffs to customers in the six (6) counties identified in Data Request No. 1?

5. Since you began operations and offering service in one or more of the six (6) counties identified in Data Request No. 1, have you bundled for sale one or more services set forth in your filed tariffs with other service(s) and sold such bundled services at a price less than the aggregate price for the individual regulated services? If so, on how many occasions have you sold bundled services at a price below the aggregate price for such individual regulated service(s) to customers in the six (6) counties identified in Data Request No. 1?
6. Since you began operations and offering service in one or more of the six (6) counties identified in Data Request No. 1, have you offered such contracts to your customers that included one or more regulated services set forth in your tariffs on file with the PSCK? If so, on how many occasions have you offered contracts to your customers in the six (6) counties identified in Data Request No. 1?
7. When you offered contracts to two or more of your customers that included one or more of the same regulated services set forth in your tariffs, has the price for the tariffed service(s) been identical in each contract? If the prices for the tariffed service(s) offered pursuant to contract have not been identical, explain the basis for the deviation in pricing.
8. When you offered contracts to your customers that included one or more services set forth in your tariffs, have you filed the contract(s) with the PSCK? If so, state the date(s) on which such filings were made and provide the case number for such filings.
9. If you have not filed the contracts that you entered into with customers in the six (6) counties identified in Data Request No. 1, state the reason(s) for your decision not to file such contracts with the PSCK.