

1. Please reference the Joint Applicants' response to the Attorney General's Initial Data Request at 1.a., Bates stamped page 000001.

- a. Have the Joint Applicants publicly stated that workforce reductions [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
- b. Regardless of the answer to subpart a., please provide the following information relative to the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] as stated in the document:
 - (i) Total number of positions;
 - (ii) The titles;
 - (iii) Job duties; and
 - (iv) Location.This breakdown should show total reduction as it related to Kentucky.

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 1:

- 1a. [REDACTED]
- b. [REDACTED]
 - (i) [REDACTED]
 - (ii) [REDACTED]

(iii)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

(iv)

[Redacted]

WITNESS: Kahan

2. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000006. Please explain what the Joint Applicants mean when they state, **[BEGIN CONFIDENTIAL]** [REDACTED]
[REDACTED] **[END**
CONFIDENTIAL]

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 2:

2. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

3. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000006. Please explain your understanding of the phrase occurring in the last bullet wherein it is stated, **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]**

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 3:

3. [REDACTED]

4. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000007. Please explain what the ramifications would be on the possibility **[BEGIN CONFIDENTIAL]** [REDACTED]

[END CONFIDENTIAL]

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 4:

4. [REDACTED]

5. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000009. After the second bullet, please explain, in detail, **[BEGIN CONFIDENTIAL]** [REDACTED]
[REDACTED] **[END CONFIDENTIAL]**

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 5:

5. [REDACTED]

6. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000010. Please explain what is meant at the last bullet wherein Joint Applicants state **[BEGIN CONFIDENTIAL]** [REDACTED]

[END CONFIDENTIAL]

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 6:

6. [REDACTED]

7. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000042. Please reference the line [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] Are these [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] packages as defined in House Bill 337, which was signed into law during the 2005 Regular Session of the Kentucky General Assembly? If not, please explain the difference between [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] and package, the latter as used in HB 337 (for which BellSouth heavily lobbied.)

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 7:

7. [REDACTED]

WITNESSES: Kahan, Roberts

8. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000044. Please reference the total force reduction of **[BEGIN CONFIDENTIAL]**  **[END CONFIDENTIAL]**

- a. Is this number inclusive of the total listed in the Joint Applicants' Response to the Attorney General's Initial Data Request at 1.a.? If not, please explain.
- b. What is the total anticipated workforce reduction as a consequence of this application?
- c. What is the total anticipated workforce reduction as a consequence of both mergers combined?

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 8:

- 8a. 
- b. 
- c. 

WITNESS: Kahan

9. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000062. What is meant by [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] at the bottom of the page?

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 9:

9. [REDACTED]

WITNESS: Kahan

10. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000361. Please reference the first bullet at **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** Will there be any reduction in Kentucky's workforce as associated with the number listed therein? If so, please provide:

- (i) The number of employees;
- (ii) Their positions;
- (iii) Their titles;
- (iv) Job duties; and
- (v) Locations.

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 10:

10. [REDACTED]

WITNESS: Kahan

11. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000391. Will any of the noted reductions occur in Kentucky? If so, please provide:

- (i) The number of employees;
- (ii) Their positions;
- (iii) Their titles;
- (iv) Job duties; and
- (v) Locations.

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 11:

11. 

WITNESS: Kahan

12. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000430. Why are no federal governmental agencies listed therein, at least in the opinion of the Joint Applicants?

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 12:

12. 


WITNESS: Kahan

13. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000465. The following quote appears, **[BEGIN CONFIDENTIAL]**

[REDACTED]

[END

CONFIDENTIAL]

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 13:

13.

[REDACTED]

[REDACTED]

WITNESS: Kahan

14. Please reference the Joint Applicants' Response to the Attorney General's Initial Data Request at Number 37, Bates stamped page 000611. Please reference the paragraph which begins, **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** Would the Joint Applicants agree not to raise basic local service in the Commonwealth of Kentucky for a specific period of time, such as three years, as a condition for the approval of this application?

HIGHLY CONFIDENTIAL RESPONSE TO DATA REQUEST 14:

14. [REDACTED]

WITNESSES: Kahan (as to why conditions are not appropriate), Roberts (as to HB 337)

15. In the event that the Attorney General agrees to enter a settlement with Joint Applicants in the instant proceeding [note: this should not be construed as an indication of any intent on the part of the Attorney General to enter any settlement agreement], would Joint Applicants agree, as a condition to any such potential settlement, to settle any and all outstanding issues pending in Kentucky PSC Case No. 2005-00186?

RESPONSE:

15. Joint Applicants are always willing to discuss settlement of pending cases on mutually agreeable terms. Joint Applicants would have to evaluate any specific settlement offer, however, before they could agree to it. Without reviewing a proposal as to the terms under which the Attorney General would settle the referenced case, Joint Applicants cannot say whether they would be willing to agree to settle that case.

WITNESS: Roberts