

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE INTRASTATE)	
SWITCHED ACCESS RATES OF ALL)	ADMINISTRATIVE
KENTUCKY INCUMBENT AND COMPETITIVE))	CASE NO.
LOCAL EXCHANGE CARRIERS)	2010-00398

**AT&T'S SUPPLEMENTAL COMMENTS IN RESPONSE
TO THE COMMISSION'S MARCH 22, 2012, ORDER**

In its Comments filed on April 23, 2012, in response to the Kentucky Public Service Commission's March 22, 2012, Order, AT&T¹ recommended that the Commission require all local exchange carriers ("LECs") – incumbent LECs ("ILECs") and competitive LECs ("CLECs") alike - to submit key data by May 10, 2012, to demonstrate that carriers make the reductions in their intrastate access rates required by the *ICC/USF Order*.² In an order released April 19, 2012,³ the FCC, with support from the industry, adopted standardized spreadsheets for carriers to use in calculating their July 1, 2012 intrastate access reductions (among other things).

AT&T supplements its initial Comments in this case and requests that the Commission order ILECs and CLECs to use the FCC's adopted standardized

¹ AT&T Kentucky, AT&T Communications of the South Central States, LLC, AT&T Long Distance Services, and TCG Ohio ("collectively, "AT&T").

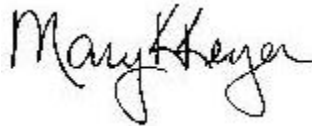
² *In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform: Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("*ICC/USF Order*"). The Order was published in the Federal Register on November 29 and the majority of its provisions were effective December 29, 2011.

³ *In the Matter of Material to be Filed in Support of 2012 Annual Access Tariff Filings*, WCB/Pricing File No. 12-08, DA 12-575 (rel. Apr. 19, 2012).

spreadsheets when providing the key data related to their intrastate access rate reductions, including the reduction in their non-traffic sensitive rate revenue requirements (“NTSRR”). Copies of the spreadsheets applicable to calculating the intrastate access reductions that are appropriate for filing with the Commission are attached hereto as **Attachments A** and **B**. Certain columns not relevant to the access reduction calculations have been blacked out to avoid any unnecessary confusion.

AT&T encourages the Commission to direct that all LECs, including CLECs, complete and file the attached FCC-approved forms by May 10, 2012, to demonstrate their compliance with their access reduction obligations.

Respectfully submitted,



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