

REQUEST: State your switched access minutes, by month, for the past five years.

RESPONSE: Objection. This request is vague and unclear as to what information is being requested, and is overly burdensome. Additionally, the information requested is irrelevant to the issues in this case and is not reasonably calculated to lead to the discovery of admissible evidence. Information regarding the amount of AT&T Kentucky's switched access minutes per month for the last five years will not assist the Commission in determining whether the CLECs' intrastate switched access rates are too high. Without waiving this objection, the total switched access minutes for AT&T Kentucky for the last five years are:

2006
2007
2008
2009
2010



The information requested is proprietary and confidential pursuant to KRS 61.878, and will be provided once an appropriate non-disclosure agreement is executed by the requesting CLECs. Accordingly, and concurrent with its response to this Data Request, AT&T Kentucky is filing a Petition for Confidentiality with the Kentucky Public Service Commission.

EDITED

REQUEST: Provide your average interstate and intrastate switched access charges per minute, by month for the past five years.

RESPONSE: Objection. The information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. AT&T Kentucky has indicated it has no access revenue shift for which it is requesting recovery. AT&T's interstate and intrastate tariffs contain multiple elements each representing a different network function and the demands are not measured by the same quantity units. Therefore, AT&T does not have or charge a single switched access rate as a blended average could incorrectly imply, and any average calculated from data provided by AT&T should not be construed as such. Moreover, the concept of an average rate is meaningless or useless when AT&T already mirrors its interstate and intrastate rate levels and rate structures and each rate element can be compared directly from the interstate and intrastate tariffs to confirm that AT&T's interstate and intrastate tariffed rates are the same on a rate element basis. *See also* AT&T's Response to twtc, Level 3 and PAETEC First Data Requests Item No. 3.

Without waiving its objections, for the purpose of responding to this question AT&T made certain assumptions regarding the traffic patterns and derived the Average Revenue per Minute (ARPM) based on revenue and demand from certain elements that are directly comparable. The results of this calculation are as follows:

Interstate ARPM = [REDACTED] for Zones 1, 2, 3 respectively.
Intrastate ARPM = [REDACTED] for Zones 1, 2, 3 respectively.

The information requested is proprietary and confidential pursuant to KRS 61.878, and will be provided once an appropriate non-disclosure agreement is executed by the requesting CLECs. Accordingly, and concurrent with its response to this Data Request, AT&T is filing a Petition for Confidentiality with the Kentucky Public Service Commission.

EDITED

REQUEST: For 2010, what was your company's total intrastate switched access revenue, by rate element, from all recurring switched access rate elements billed (including switched dedicated elements that are priced on a flat-rate basis)?

RESPONSE: Objection. The information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. AT&T Kentucky has indicated it has no access revenue shift for which it is requesting recovery. Without waiving this objection, AT&T states that Attachment 1 to twtc, Level 3, and PAETEC First Data Requests Item No. 3 contains the revenues and demand quantities for intrastate rate elements. The tandem routed data include third party transit traffic that cannot be disaggregated, therefore any use to calculate an average as requested in Item No. 1 will be inaccurate and meaningless.

The information requested is proprietary and confidential pursuant to KRS 61.878, and will be provided once an appropriate non-disclosure agreement is executed by the requesting CLECs. Accordingly, and concurrent with its response to this Data Request, AT&T is filing a Petition for Confidentiality with the Kentucky Public Service Commission.

Element	2010	
	Sum of Demand	Sum of Revenue
06		
64 Clean Chan /DS1 opt as Extended SF		
Intrastate		
\$0.000000		
64 Clean Chan /DS1 opt as Superframe Fmt		
Intrastate		
\$0.000000		
ANI - per Message		
Intrastate		
\$0.000080		
ANI - per Trunk Group		
Intrastate		
\$0.000000		
CCS7 Signaling Conn /56kbps Fac		
Intrastate		
\$155.000000		
CCS7 Signaling Termination /STP Port		
Intrastate		
\$337.050000		
Dedicated EO Trunk Port DS0/VG		
Intrastate		
\$9.470000		
Dedicated EO Trunk Port DS1		
Intrastate		
\$139.980000		
Dedicated Switched IOC - DS0		
Intrastate		
\$43.000000		
Dedicated Switched IOC - DS1		
Intrastate		
\$75.000000		
\$80.000000		
\$85.000000		
Dedicated Switched IOC - DS1 - 0 miles		
Intrastate		
\$0.000000		
Dedicated Switched IOC - DS3		
Intrastate		
\$972.540000		
Dedicated Switched IOC - DS3 - 0 miles		

Element	2010	
	Sum of Demand	Sum of Revenue
Intrastate \$0.000000 Dedicated Switched IOC - VG - 0 miles		
Intrastate \$0.000000 Dedicated Switched IOM - DS0		
Intrastate \$3.980000 Dedicated Switched IOM - DS1		
Intrastate \$16.000000 \$18.650000 \$19.600000 Dedicated Switched IOM - DS3		
Intrastate \$97.250000 Dedicated Tandem Trunk Port DS0/VG		
Intrastate \$9.470000 Dedicated Tandem Trunk Port DS1		
Intrastate \$139.980000 DID or DID/DOD Trunk Term		
Intrastate \$15.420000 DS1 Chan - DS1 to DS0/Analog		
Intrastate \$149.930000 DS3 Channel - COCI /DS1		
Intrastate \$0.000000 DS3 Channel - DS3 to DS1		
Intrastate \$721.300000 Establishment of DID w/LSBSA		
Intrastate \$0.010000 MSNS - DS1 Interface Per Interface, 60 Mos		
Intrastate \$52.000000		

Element	2010	
	Sum of Demand	Sum of Revenue
\$76.000000 MSNS DS1 IOC - 9-25 Miles 60 Mo Intrastate		
\$300.000000 MSNS DS1 IOC - 9-25 Miles MTM Intrastate		
\$19.000000 MSNS DS1 IOM - 25+ Miles MTM Intrastate		
\$0.000000 MSNS DS1 IOM - 9-25 Miles 60 Mo Intrastate		
\$76.000000 MSNS DS1/DS0 Interface - Per Interface MTM Intrastate		
\$140.000000 SMARTRing Alt COC/ .25 Mile 61-96 Mos Intrastate		
\$1,575.000000 SMARTRing CO Node - OC-12 - 61-96 Mos Intrastate		
\$3,510.000000 SMARTRing CO Node - OC-48 - 61-96 Mos Intrastate		
\$4,860.000000 SMARTRing CO Node - OC-48 MTM Intrastate		
\$450.000000 SMARTRing COCI/28 DS1 - DS3 - 61-96 Mos Intrastate		
\$650.000000 SMARTRing COCI/28 DS1 - DS3 MTM Intrastate		
\$7.000000 SMARTRing COCI/DS1 on 28 DS1 - DS3 61-96 Mos Intrastate		
\$12.000000 SMARTRing COCI/DS1 on 28 DS1 - DS3 MTM Intrastate		
\$12.000000 SMARTRing COCI/DS3 - 61-96 Mos Intrastate		

Element	2010	
	Sum of Demand	Sum of Revenue
Intrastate \$75.000000 SMARTRing COCI/DS3 MTM		
Intrastate \$115.000000 SMARTRing CUCI/DS3 - 61-96 Mo		
Intrastate \$125.000000 \$1,575.000000 SMARTRing Cust Node OC-48 - 61-96 Mos		
Intrastate \$3,510.000000 SMARTRing Cust Node OC-48 MTM		
Intrastate \$5,220.000000 SMARTRing IOC >OC-3 Fixed 61-96 Mos		
Intrastate \$117.000000 SMARTRing IOC OC-3+/12/48/48+ Fixed MTM		
Intrastate \$158.000000 SMARTRing IOM >OC-3 /.25 Mile 61-96 Mos		
Intrastate \$23.000000 SMARTRing IOM OC-3+/12/48/48+ /.25 Mile MTM		
Intrastate \$50.000000 SMARTRing LC/ .25 Mile 61-96 Mos		
Intrastate \$68.000000 SMARTRing LC/.25 Mile MTM		
Intrastate \$95.000000 SONET LC - OC-48 Opt Cust Term - 61-96 Mo		
Intrastate \$5,760.000000 SWA MSNS DS1 IOC - 25+ Miles 60 Mo		
Intrastate \$138.000000 \$251.000000		

Element	2010	
	Sum of Demand	Sum of Revenue
Switched LC - DS1 Intrastate \$168.000000 \$175.000000 \$180.000000		
Switched LC - DS3 Intrastate \$1,515.550000		
Switched LC - VG - 2W Intrastate Intrastate \$56.250000		
USAGE		
03 Carrier Common Line - Orig Rate - Prem Intrastate \$0.000000		
Carrier Common Line - Term Rate - Prem Intrastate \$0.000000		
06 500 Cust ID - per Call Intrastate \$0.010000		
800 Acc Svc w/800 Num Del - per Quer Intrastate \$0.004210		
800 Acc Svc w/800 Num Del w/VF- per Quer Intrastate \$0.004296		
800 Acc Svc w/POTS Del - per Quer Intrastate \$0.003830		
Access Tandem Switching Intrastate \$0.001198		
CCS7 Signaling Usage - Call Set-up (ISUP) Intrastate \$0.000003		
CCS7 Signaling Usage - TCAP		

Element	2010			
	Sum of Demand	Sum of Revenue		
Intrastate \$0.000012 Common Transport Facility (minute miles)				
Intrastate \$0.000023 Common Transport Termination (minutes)				
Intrastate \$0.000176 Common Trunk Port Service				
Intrastate \$0.000800 DS3 to DS1 Mux Per MOU				
Intrastate \$0.002158 Local Switching 1 - Premium				
Intrastate \$0.002158 Local Switching 2 - Premium				
Intrastate \$0.002158 Local Switching 3 - Premium				
Intrastate \$0.002148 Local Switching 4 - Premium				
Grand Total				

REQUEST: For each rate element identified in Request #3 above, provide the intrastate billed demand for each rate element for 2010.

RESPONSE: *See* AT&T's Response to twtc, Level 3, and PAETEC First Data Requests Item No. 3.

REQUEST: Identify any differences in rate structure between your interstate and intrastate switched access tariffs.

RESPONSE: AT&T Kentucky's interstate and intrastate tariffs are available at the following internet sites:

BellSouth Telecommunications Inc. – Tariff FCC No. 1
<http://cpr.att.com/pdf/fcc/fcc.htm>

BellSouth Telecommunications Inc. Kentucky – Access Services Tariff,
PSC KY Tariff 2E
<http://cpr.bellsouth.com/pdf/ky/ky.htm>

REQUEST: Provide a comparison of your interstate and intrastate switched access rates by rate element for 2009 and 2010.

RESPONSE: *See* AT&T's Response to twtc, Level 3, and PAETEC First Data Requests Item No. 5.

REQUEST: Provide a year-end income statement and balance sheet for your company for the past five years.

RESPONSE: Objection. The request seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. To the extent this request seeks information from states other than Kentucky, AT&T also objects. Without waiving these objections, AT&T's Annual Reports for the past five years are publicly available at AT&T's Investor Relations website:

<http://www.att.com/gen/investor-relations?pid=9186>

REQUEST: Provide the return on equity and return on rate base — total company and Kentucky intrastate only — for each year for the past five years.

RESPONSE: Objection. The request seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, AT&T Kentucky states it is not rate-of-return regulated and does not have these values readily available. AT&T's Annual Reports for the past five years are publicly available at AT&T's Investor Relations website:

<http://www.att.com/gen/investor-relations?pid=9186>

REQUEST: State the number of access lines subscribing to stand-alone basic local service (that is, without any additional optional features or services, including DSL) at year end, for each of the past five years.

RESPONSE: Objection. The information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The number of basic access lines AT&T Kentucky has over the past five years has no bearing on the intrastate access rates of the CLECs requesting this information. AT&T has indicated it has no access revenue shift for which it is requesting recovery. Without waiving this objection, AT&T will provide AT&T Kentucky's number of access lines subscribing to stand-alone basic local service to the extent it is available as a supplemental response to this request.

REQUEST: Does your company or an affiliate provide DSL? If the answer is yes, provide:

- a. The number of residential and business lines that subscribe to DSL service;
- b. The average monthly price for DSL for 2011; and
- c. If an affiliate provides DSL, how the ILEC company is compensated (including structure and level) for the use of the local loop to provide DSL.

RESPONSE: Objection. The information requested is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence regarding the issues in this case. Without waiving this objection, AT&T Kentucky provides DSL and its prices are available at att.com.

REQUEST: What is the monthly recurring price (at year-end 2010) and number of units sold (during calendar year 2010) for each bundle or package that includes basic local service?

RESPONSE: Objection. The information requested is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and is overly broad and burdensome. Without waiving this objection, pricing for AT&T's bundles or packages that include basic local service may be found at att.com.

REQUEST: State the current level of basic local service and the corresponding interstate SLC, assuming no additional features are purchased by the customer.

RESPONSE: The following information is from AT&T Kentucky's current General Subscriber Services Tariff Section A3 and BellSouth Telecommunications Inc. – Tariff FCC No.1, Section 4:

<u>Rate Group</u>	<u>Flat Rate Residence</u>	<u>Flat Rate Business</u>	<u>Interstate SLC</u>
Group 1	\$15.20	\$35.90	\$6.50
Group 2	\$15.20	\$35.90	\$6.50
Group 3	\$16.65	\$35.90	\$6.50
Group 4	\$17.30	\$33.75	\$6.50
Group 5	\$18.40	\$33.75	\$6.50

REQUEST: Provide your average revenue per residential and switched access line for each of the past five years, including all revenues for optional retail services in the numerator. Identify all additional features and services for which revenues were collected in each year.

RESPONSE: Objection. Since AT&T Kentucky's intrastate switched access rates mirror its interstate switched access rates, the information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, AT&T Kentucky does not have the information requested readily available.

REQUEST: With respect to the access revenue shift estimate and numbers you filed with the Commission on or about April 15, 2011, provide all workpapers for each such estimate or number, including spreadsheets, calculations, and input data.

RESPONSE: This request is inapplicable as AT&T Kentucky indicated in its April 15, 2011 filing in this case that there is no access revenue shift for AT&T Kentucky.