

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

In the Matter of:

An Investigation into the Intrastate )  
Switched Access Rates of All Kentucky )  
Incumbent and Competitive Local )  
Exchange Carriers )

Administrative Case: 2010-00398

**SE ACQUISITIONS, LLC d/b/a SouthEast Telephone's First Set of Data Requests to AT&T**

SE Acquisitions, LLC d/b/a SouthEast Telephone ("SouthEast") requests that AT&T respond to the following data requests separately and completely, by no later than June 10, 2011.

**Instructions**

SouthEast requests that AT&T provide responses to these data requests in electronic format, transmitted via e-mail and/or on clearly labeled CD-ROM disks that can be read by personal computers using the Microsoft Windows Operating System. Include with each response the name and job title of the witness who will be responsible for responding to questions relating to the information provided.


**Data Requests**

1. Identify those states that have
  - (a) adopted a plan similar to the plan proposed by AT&T and;
  - (b) summarize the revenue and cost impact on those states.
  
2. Explain how the adoption of plans similar to the proposed plan by AT&T affected the structure and level of consumer costs in those states.

3. Indicate if any rate increases or new charges were introduced in those states as a result of implementing reform.
4. Provide total number of AT&T access lines currently in service in Kentucky in:
  - (a) Metropolitan Areas
  - (b) Rural Areas
5. Does AT&T agree that further reduction of switched access rates will require a shift of costs to end users? Why or why not?
6. What indicators are appropriate measures to demonstrate that access rate reductions encourage competition?
7. Provide what costs AT&T's proposed rate is designed to cover.
8. Are AT&T costs for providing service the same for all zones throughout Kentucky? Why or why not?
9. How often does AT&T evaluate access pricing in Kentucky?
10. Does AT&T's pricing differ among states?
11. Explain AT&T's view as to why Kentucky should not recognize a rural CLEC and implement a rural exemption for rural CLECs as the FCC does.
12. Why does AT&T's proposal exclude CLECs from the KUSF?

13. Does AT&T contend that all carriers have the same costs for providing service?
14. Does AT&T agree that access rates should correlate with the carrier's costs?
15. Does AT&T contend that CLECs provide the same access service in the same geographic area as AT&T?
16. Page 6 of AT&T's Petition and Complaint states, " In its recent National Broadband Plan, the FCC encouraged states to complete rebalancing of local rates to offset the impact of lost access revenues as doing so would encourage carriers and states to rebalance rates to move away from artificially low \$8 to \$12 residential rates that represent implicit subsidies to levels that are more consistent with costs." Does AT&T contend that all carriers in Kentucky enjoy this rate?
17. What is AT&T's current market share in Kentucky per zone?
18. In the states that have implemented reform similar to that proposed by AT&T, does evidence show that the long distance rates decreased?
19. What benefits does AT&T propose that Kentucky consumers will see if the plan is accepted?
20. Provide evidence that the toll market decline is due to access charge levels.

Respectfully submitted,



Bethany Bowersock  
106 Scott Ave.  
Pikeville, KY 41501