

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 NO.
2010-00398

RESPONSE OF
SE ACQUISITIONS, LLC D/B/A SOUTHEAST TELEPHONE
TO THE FIRST DATA REQUESTS OF
AT&T

FILED: JUNE 9 , 2011

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 1

1. Do you offer standalone basic local exchange service as defined in KRS 278.541? If so, for each year from 2001 through 2010, and for 2011 most recent data available, please provide the total number of revenue-producing *retail* access lines for the following:
 - (a) Residential standalone basic local exchange service (as defined in KRS 278.541) access lines, including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP).
 - (b) Business standalone basic local exchange service (as defined in KRS 278.541) access lines, including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP).
 - (c) Residential non-basic local exchange service access lines (as defined in KRS 278.541), including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP), and voice grade equivalent lines for ISDN-BRI.
 - (d) Business non-basic local exchange service access lines (as defined in KRS 278.541), including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP), and voice grade equivalent lines to which intrastate switched access applies (e.g., all activated B-channels in an ISDN-PRI or ISDN-BRI to the extent the ISDN-PRI or ISDN-BRI is providing connectivity to the PSTN).
 - (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response: Objection. The question is not relevant to the subject matter of this proceeding and the information requested is not reasonably calculated to lead to admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 2

2. For each year from 2001 through 2010, and for 2011 most recent data available, please provide the average monthly revenue per line identified in Data Request 1(a), 1(b), 1(c), 1(d) and 1(e). If the average monthly revenue figures are not available in the format requested for each of these types of lines, provide the total annual revenue for the years requested, for all lines identified in Data Request 1, presented at the greatest level of disaggregation the ILEC maintains in its historical revenue records.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response: Objection. The question is not relevant to the subject matter of this proceeding and the information requested is not reasonably calculated to lead to admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 3

3. For each year from 2001 through 2010, and for 2011 most recent data available, please provide the total number of all revenue-producing **wholesale** access lines (*i.e.*, resale, UNE loops, and facilities that have the capability to provide voice grade equivalent service) for the following:
- (a) Residential standalone basic local exchange service (as defined in KRS 278.541)
 - (b) Business standalone basic local exchange service (as defined in KRS 278.541)
 - (c) Residential non-basic local exchange service access lines, including voice grade equivalent lines for ISDN BRI.
 - (d) Business non-basic local exchange service access lines, including voice grade equivalent lines (*e.g.*, all activated B-channels in an ISDN-PRI or ISDN-BRI to the extent the ISDN-PRI or ISDN-BRI is providing connectivity to the PSTN).
 - (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast objects to the requested time periods identified in this request. The information for years prior to 2011 is not relevant to the subject matter involved in the pending action and will not lead to the discovery of admissible evidence. Please see below for SouthEast's response to the question regarding the year 2011.

- (a) SouthEast currently provides residential standalone basic local exchange service to 3532 wholesale access lines.
- (b) SouthEast currently provides business standalone basic local exchange service to 514 wholesale access lines.
- (c) SouthEast currently provides residential non-basic local exchange service to 22,281 wholesale access lines.
- (d) SouthEast currently provides business non-basic local exchange service to 514 wholesale access lines.
- (e) This question does not apply to SouthEast.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 4

4. For each of the *retail* types of lines identified in Data Request 1(a) through (e), for 2010, and for 2011 most recent data available, provide the calculated weighted average local rate per line per month, and all back-up information and worksheets that support these calculations.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 5

5. For each of the **wholesale** types of lines in Data Request 3 (a) through (e), for 2010, and for 2011 most recent data available, provide the calculated weighted average local rate per line per month, and all back-up information and worksheets that support these calculations.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 6

6. For 2010, and 2011 most current data available, provide the following:
- (a) Volumes of intraMTA minutes terminated by you on behalf of all wireless carriers, and dollars billed for such terminating intraMTA minutes broken out by
 - 1. IntraLATA intrastate,
 - 2. InterLATA intrastate, and
 - 3. InterLATA interstate.
 - (b) Volume of intrastate, interMTA minutes terminated by you on behalf of wireless carriers, and dollars billed for such intrastate, interMTA minutes.
 - (c) Volume of local minutes terminated by you and dollars billed for wireless traffic as reciprocal compensation for such traffic;
 - (d) Volume of local minutes terminated by you and dollars billed for non-wireless traffic as reciprocal compensation for such traffic;

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast objects to the portion of subsection (d) of this question that requests dollars billed for non-wireless traffic as reciprocal compensation as being irrelevant to the issues in this proceeding.

(a)	0
(b)	0
(c)	0
(d)	October 2010: 11782979.00
	November 2010: 10940586.30
	December 2010: 11908843.90
	January 2011: 11889099.40
	February 2011: 9942629.63
	March 2011: 10329800.00
	April 2011: 9456752.45

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 7

7. What rate(s) do you charge for termination of intraMTA wireless calls? Provide the source showing the basis for each such rate(s).

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. This question does not currently apply to SE Acquisitions, LLC d/b/a SouthEast Telephone.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 8

8. What rate(s) do you charge for termination of VoIP calls originated by VoIP providers?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone
("SouthEast")

Response. SouthEast charges its filed tariff rates for termination of VoIP calls originated by VoIP providers.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 9

9. For each year from 2001 through 2010, and for 2011 most recent data available, provide, and in (a) thru (d) specifically identify and group the revenues in a matrix by (1) type of provider (CLEC/ILEC, mobile wireless services provider, cable VoIP services provider, and non-cable VoIP services provider), and by (2) each rate element billed. Please identify separately (if any) revenues from your non-ILEC affiliates.
- (a) Total *intrastate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
 - (b) Total *intrastate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
 - (c) Total *interstate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
 - (d) Total *interstate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
 - (e) Please provide the work papers for the rate elements, volumes, revenues and associated calculations for (a) through (d) above in electronic/Excel format. Please specify the unit of measure for each rate element (*e.g.*, MOU, circuit/month, line, message, etc.). If the billing basis is not MOU, please provide the relevant quantities associated with each rate element.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 10

10. For 2010, and for 2011 most recent data available, for you and your affiliates (if any), please provide the following:
- (a) Total Kentucky *intrastate* originating and terminating switched MOUs and access expenditures paid to other providers (*i.e.*, ILECs and CLECs, excluding payments to any of your affiliates). Please provide payments to each carrier and group by ILECs and CLECs separately;
 - (b) Total Kentucky *interstate* originating and terminating switched MOUs and access expenditures paid to other providers (*i.e.*, ILECs, and CLECs, excluding any of your affiliates). Please provide payments to each carrier and group by ILECs and CLECs separately;
 - (c) Please respond to (a) and (b) for the traffic (excluded above) between you and your Kentucky affiliates.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 11

11. Please provide separate estimates of the percentage of terminating intercarrier traffic you and your parent companies and affiliates receive both in Kentucky and nationwide that lacks sufficient call detail or signaling information to either (a) identify the carrier financially responsible for intercarrier charges or (b) apply the proper compensation regime for interstate access, intrastate access, and reciprocal compensation (such traffic is generally and collectively known as "phantom traffic".)

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Please see attached Exhibit A for information regarding SouthEast and Exhibit B for information regarding Lightyear Network Solutions.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 12

12. What is your practice for determining the intercarrier compensation applicable to traffic that lacks sufficient information to otherwise identify the traffic's proper intercarrier compensation regime? Cite all your intrastate and interstate tariffs, interconnection agreements, or other relevant sources that determine what intercarrier compensation scheme should apply to such traffic.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast currently bills the operating company number (OCN) of the owner of the line if it cannot obtain a carrier identification code (CIC).

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 13

13. Please provide your estimate of the percentage of your terminating intercarrier traffic, both for traffic sent or received by you in Kentucky, for which the compensation regime (interstate access, intrastate access, or reciprocal compensation) is mischaracterized.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast objects to this request as seeking information that is irrelevant to the issues in this proceeding and is not likely to lead to admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 14

14. Have you, your parent companies and/or affiliates filed any appeals of FCC Orders that established your interstate switched access rates?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Neither SouthEast nor Lightyear Network Solutions have filed any appeals of FCC Orders that established the company's interstate access rates.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 15

15. Have you ever made a claim or appeal in any forum that your existing interstate switched access rates are not compensatory or are confiscatory? Please list every instance where such claim or appeal was made, provide all evidence supporting such claim, and indicate the result of the related challenge or appeal (if any)?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. No, neither SouthEast nor Lightyear Network Solutions have made a claim or appeal in any forum that its existing interstate switched access rates are not compensatory or confiscatory. SouthEast meets the definition of "rural CLEC" under 47 CFR 61.26; therefore, it is qualified to bill at the highest rate band of NECA.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 16

16. Regarding the origination and termination of landline toll traffic in Kentucky:
- (a) Does the function provided by you for interstate originating and terminating switched access service materially differ from the functionality provided for your intrastate originating and terminating switched access service? If so, identify and describe each material difference in detail, and quantify the cost difference caused by each purported material difference.
 - (b) Does the functionality you use to provide terminating switched access services, either for interstate or intrastate toll calls, materially differ from the functionality you use to provide local call termination for which either the FCC adopted reciprocal compensation charge or local interconnection charge applies? If so, identify and describe each material difference in detail, and quantify the cost difference caused by each purported material difference.
 - (c) Does the function you perform to provide terminating switched access services, either for interstate or intrastate calls, materially differ from the function you use to terminate VoIP originated calls? If so, identify and describe each material difference, and quantify the cost difference caused by each purported material difference.
 - (d) Does the function you perform to provide terminating switched access services, either for interstate or intrastate calls, materially differ from the function you use to terminate intraMTA wireless calls, either interstate or intrastate? If so, identify and describe each material difference, and quantify the cost difference caused by each purported material difference.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. (a) The function provided by SouthEast for interstate originating and terminating switched access service does not materially differ from the functionality provided for its intrastate originating and terminating switched access service.

(b) The functionality used by SouthEast to provided terminating switched access services does not materially differ from the functionality used to provide local call termination for reciprocal compensation or local interconnection charges.

(c) The functionality used to provide terminating switched access services does not materially differ from the function used to terminate VoIP originated calls.

(d) This question does not apply to SouthEast.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 17

17. In accordance with the FCC's April 26, 2001 Seventh Report and Order in CC Docket 96-262, have you capped your interstate switched access rates to the level of the interstate switched access rates of the incumbent local exchange carrier with which you compete?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. In its April 26, 2001, Seventh Report and Order in CC Docket 96-262, the FCC determined that limiting CLECs to the higher benchmark rate or the access rate of its ILEC competitor is too harsh for the CLECs that operate solely in rural areas. Therefore, the FCC created the rural exemption for these CLECs that allows them to bill at higher rates than the interstate switched access rates of the incumbent local exchange carrier. SouthEast is a recognized rural CLEC that qualifies for this exemption; therefore, it has not capped its interstate switched access rate at the level of the incumbent local exchange carrier and should not be required to cap its intrastate access rates either.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 18

18. Do you or any of your parent companies or affiliates in any other state mirror your interstate and intrastate access rates or any individual rate elements? Also, are you subject to any future mirroring (e.g., by an order that requires phased-in mirroring)?
- (a) Please list all states where you or an affiliate company mirror these rates or rate elements;
 - (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you or an affiliate entity to mirror these rates;
 - (c) Please state whether you or your affected affiliate entity appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
 - (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response: Lightyear Network Solutions, LLC, an affiliate of SouthEast, does not mirror SouthEast's interstate or intrastate access rate or any other individual rate elements.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 19

19. Do you or any of your parent companies or affiliates in any other state mirror the intrastate access rates or any individual rate elements of the competing ILEC, or have you or any of your parent companies or affiliates been ordered to do so in the future?
- (a) Please list all states where you mirror these rates or rate elements;
 - (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you to mirror these rates;
 - (c) Please state whether you appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
 - (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast does not mirror the intrastate access rates or any individual rate elements of the competing ILEC; however, Lightyear Network Solutions, LLC ("Lightyear") does mirror the intrastate access rates of its competing ILEC. Lightyear has not been ordered to mirror the intrastate access rates of the competing ILEC. Lightyear mirrors ILEC rates in the following states:

- Georgia: Lightyear's tariff rates match the rates of the ILEC with the exception of the local switching rate.
- Florida: Lightyear's tariff rates match the rates of the ILEC with the exception of the local switching rate and carrier common line rate.
- Kentucky: Lightyear's tariff rates match the rates of the ILEC with the exception of the local and tandem switching rates.
- NC: Lightyear's originating carrier common line rate match the ILEC rate.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 20

20. If not otherwise identified in Data Requests 18 and 19, have you or any of your parent companies or affiliates in any other state been ordered to restrict its access rates in any way?
- (a) Please list all states where your access rates are restricted and describe the restriction;
 - (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you to restrict your access rates;
 - (c) Please state whether you appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
 - (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Neither SouthEast nor Lightyear Network Solutions, LLC have been ordered to restrict its access rates.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 21

21. Have you ever filed a pleading with the FCC indicating your support for a unified interstate and intrastate rate? If yes, provide such filing or a cite to obtain the document if publicly available.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast has not ever filed a pleading with the FCC indicating its support for a unified interstate and intrastate rate.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 22

22. Do you provide intrastate toll and interstate toll services in Kentucky? If not, do you have an affiliate that provides those services? If so, provide the names of the affiliates and the type of service they provide.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast provides intrastate toll and interstate toll services in Kentucky.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 23

23. For each year from 2001 through 2010, and for 2011 most recent data available, for you and your affiliates (if any), please provide the following:
- (a) Total Kentucky *intrastate* toll MOUs and revenues;
 - (b) Total Kentucky *interstate* toll MOUs and revenues

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast objects to the subpart of this question regarding revenues. SouthEast and Lightyear's revenues are not relevant to the subject matter of this proceeding and the information regarding revenues is not likely to lead to admissible evidence. SouthEast and Lightyear's MOUs are reflected in Exhibit C of this filing.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 24

24. Do you have any elasticity studies for local or toll services? If so, please produce copies of them.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. SouthEast does not have any elasticity studies for local or toll services.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 25

25. Provide the total amount of revenues and volumes for retail vertical services for each year from 2001 through 2010, and for 2011 most recent data available.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

SE Acquisitions, LLC d/b/a SouthEast Telephone's
Responses to AT&T's First Data Requests
Question No. 26

26. Provide a schedule reflecting your local rates for residential and business customers by rate group for the last 10 years.

Responsible Party: Counsel for SE Acquisitions LLC d/b/a SouthEast Telephone ("SouthEast")

Response. Objection. The information requested is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

Question 11
Exhibit A

SE Acquisitions, LLC												
	October, 2010	November, 2010	December, 2010	January, 2011	February, 2011	March, 2011	April, 2011	Totals	Percentages			
Phantom Msgs	0	0	0	0	0	0	0	0				
Total Billable Msgs	4743472	4634871	5059576	4764935	4437290	488409	4851819	33378372				
Phantom MOUs	0	0	0	0	0	0	0	0				
Total Billable MOUs	1117432403	1137804585	1306293838	1268457641	1099943568	1202079063	1132507716	8264518814				

Lightyear Network Solutions Exhibit B		Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	Totals	Percentages
1940 Kentucky	Phantom Msgs	0	0	0	0	0	0	0	0	
	Total Billable Msgs	128151	138559	115757	124705	144569	107932	106852	866525	0.00%
	Phantom MOUs	0	0	0	0	0	0	0	0	
	Total Billable MOUs	220307	236966	198921	216469	245403	185119	179223	1482408	0.00%
2838 Colorado	Phantom Msgs	1	2	1	1	0	0	3	8	0.01%
	Total Billable Msgs	14871	15177	12465	12500	13417	11663	13990	94083	
	Phantom MOUs	1	1	1	1	0	0	3	7	0.00%
	Total Billable MOUs	34740	37082	31144	32802	36213	30758	31786	234525	0.00%
3135 Florida	Phantom Msgs	11	2	1	2	3	2	7	28	0.00%
	Total Billable Msgs	194873	193590	156214	173510	190277	164506	166744	1239714	
	Phantom MOUs	18	5	6	4	7	6	15	61	0.00%
	Total Billable MOUs	402376	394895	324415	355423	381367	311361	310422	2480259	0.00%
3136 Indiana	Phantom Msgs	1	1	2	1	1	4	0	10	0.00%
	Total Billable Msgs	36777	40150	31648	34067	34658	29610	32208	239118	
	Phantom MOUs	2	2	2	12	2	93	0	113	0.02%
	Total Billable MOUs	100249	106704	89451	104494	100703	88465	90013	680079	0.00%
3137 North Carolina	Phantom Msgs	0	0	0	0	0	0	0	0	0.00%
	Total Billable Msgs	20180	22309	17182	19103	21276	17141	17541	134732	
	Phantom MOUs	0	0	0	0	0	0	0	0	0.00%
	Total Billable MOUs	43914	45709	37360	39126	43946	35089	34192	279336	0.00%
3138 New York	Phantom Msgs	0	0	0	0	0	0	0	0	0.00%
	Total Billable Msgs	30854	40370	33536	39540	47821	37324	34842	264287	
	Phantom MOUs	0	0	0	0	0	0	0	0	0.00%
	Total Billable MOUs	94187	125184	105212	118091	134565	100009	92996	770244	0.00%
4330 Texas	Phantom Msgs	0	0	0	0	0	0	0	0	0.00%
	Total Billable Msgs	169327	176159	155898	161207	164746	149030	168471	1144838	
	Phantom MOUs	0	0	0	0	0	0	0	0	0.00%
	Total Billable MOUs	251562	263777	230026	226296	249373	218988	244607	1684629	0.00%
5348 Georgia	Phantom Msgs	0	0	0	0	0	0	0	0	0.00%
	Total Billable Msgs	297213	314538	258692	279136	316510	265998	269787	2001874	
	Phantom MOUs	0	0	0	0	0	0	0	0	0.00%
	Total Billable MOUs	539320	580433	478739	518926	618491	492115	483103	3711127	0.00%
5370 California	Phantom Msgs	61	24	7	15	3	9	43	162	0.03%
	Total Billable Msgs	115038	110485	73172	75121	80488	75949	80922	611175	
	Phantom MOUs	62	69	51	93	48	79	164	566	0.03%
	Total Billable MOUs	320117	326567	224408	243690	265993	246648	256554	1883977	0.00%
5390 Tennessee	Phantom Msgs	0	0	0	0	0	0	0	0	0.00%
	Total Billable Msgs	86982	83646	65923	70588	83059	68226	70900	529324	
	Phantom MOUs	0	0	0	0	0	0	0	0	0.00%
	Total Billable MOUs	129894	128823	108116	115987	130101	101008	98799	812728	0.00%
7328 Maryland	Phantom Msgs	1	6	23	17	20	12	18	97	0.09%
	Total Billable Msgs	13207	17511	13717	19508	15955	13737	13174	106809	
	Phantom MOUs	1	26	246	190	131	12	224	830	0.30%
	Total Billable MOUs	33863	43773	36786	45064	41230	36940	36072	273728	0.00%
Totals All States	Phantom Msgs	75	35	34	36	27	27	71	305	0.00%
	Total Billable Msgs	1107473	1152494	934204	1008985	1112776	941116	975431	7232479	
	Phantom MOUs	84	103	306	300	188	190	406	1577	0.01%
	Total Billable MOUs	2170529	2289913	1864578	2016368	2247385	1846500	1857767	14293040	0.01%

Exhibit C
Question 23

	Oct. 2010		Nov. 2010		Dec. 2010		Jan. 2010		Feb. 2011		March 2011		April 2011	
		MOU	MOU	MOU	MOU	MOU	MOU	MOU						
Ky Interstate		181,157,222	179,918,835	201,615,250	192,931,896	165,305,519	183,796,432	175,375,681						
Ky Intrastate		639,333,395	654,809,198	761,900,042	738,445,140	626,979,043	683,352,624	641,721,830						

	Oct. 2010		Nov. 2010		Dec. 2010		Jan. 2010		Feb. 2011		March 2011		April 2011	
		MOU	MOU	MOU	MOU	MOU	MOU	MOU						
Lightyear Network Solutions														
Ky Interstate		54,504.90	50,792.47	64,996.75	53,091.30	60,497.92	54,056.46	56,555.39						
Ky Intrastate		109,573.57	104,596.05	128,416.78	105,786.24	125,630.33	121,451.97	116,542.07						

CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission on June 9, 2011, is a true and accurate copy of the document filed herewith in the paper form, and the electronic version of the filing has been transmitted to the Commission.


Beth Bowersock