

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

In the Matter of:

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

**WINDSTREAM KENTUCKY EAST, LLC AND WINDSTREAM KENTUCKY WEST,
LLC'S DATA REQUESTS TO MCI COMMUNICATIONS SERVICES, INC. d/b/a
VERIZON BUSINESS SERVICES, BELL ATLANTIC COMMUNICATIONS, INC. d/b/a
VERIZON LONG DISTANCE, NYNEX LONG DISTANCE COMPANY d/b/a VERIZON
ENTERPRISE SOLUTIONS, TTI NATIONAL, INC., TELECONNECT LONG
DISTANCE SERVICES & SYSTEMS COMPANY d/b/a TELECOM*USA AND
VERIZON SELECT SERVICES, INC.**

Without waiving and upon express reservation of all of their rights as alternatively regulated carriers statutorily exempt from this proceeding, Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”) submit the following Data Requests to MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc. Teleconnect Long Distance Services & Systems Company d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, “Verizon”) to be answered in accord with the following:

DEFINITIONS

- “Windstream East” means Windstream Kentucky East, LLC f/k/a Windstream Kentucky East, Inc., and “Windstream West” means Windstream Kentucky West, LLC f/k/a Windstream Kentucky West, Inc.
- “You” and “your” refer to MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long

Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc. Teleconnect Long Distance Services & Systems Company d/b/a Telecom*USA and Verizon Select Services, Inc., individually or collectively. As used herein, the terms “you” and “your” are intended to reflect all territories in which the aforementioned legal entities maintain operations.

- “Affiliate” as defined in Section 3 of the Communications Act of 1934, as amended (“the Act”) means “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.” (47 U.S.C. §153(1).) As used herein, unless otherwise stated, the term “affiliate” is intended to reflect only the Kentucky operations of your affiliates.
- “Document” shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in your full or partial possession, custody or control, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original.
- “Referring” or “relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

- “And” and “or” as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction shall serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.
- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by these discovery requests, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:
 - a. the type of document (*e.g.*, letter, memorandum, etc.);
 - b. the date of the document;
 - c. the title or label of the document;
 - d. the identity of the document originator;
 - e. the identity of each person to whom the document was sent;
 - f. a summary of the contents of the document; and
 - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

These discovery requests are to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control.

To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

If any request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

These requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known.

For each request, provide the name of your witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

1. For each year from 2006 to the present, please provide, by local exchange carrier (“LEC”) in Kentucky, the originating access minutes of use (“MOUs”) for which you compensated each LEC or, in a case where you did not remit the compensation, for which you were billed by each LEC.

2. With respect to the originating access minutes of use (“MOUs”) that you provided in response to Data Request No. 1, please provide the corresponding amounts that you paid each carrier that you identified in your response for each year from 2006 to the present. In the case in which you did not remit the compensation to the carrier, please provide the amounts that you were billed, invoiced, or otherwise charged by the carrier.

3. For each year from 2006 to the present, please provide, by local exchange carrier (“LEC”) in Kentucky, the terminating access minutes of use (“MOUs”) for which you compensated each LEC or, in a case where you did not remit the compensation, for which you were billed by each LEC.

4. With respect to the terminating access minutes of use (“MOUs”) that you provided in response to Data Request No. 3, please provide the corresponding amounts that you paid each carrier that you identified in your response for each year from 2006 to the present. In the case in which you did not remit the compensation to the carrier, please provide the amounts that you were billed, invoiced, or otherwise charged by the carrier.

Respectfully submitted,

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Certification

I hereby certify that the electronic version of this filing made with the Commission this - 2nd day of May, 2011 is a true and accurate copy of the documents filed herewith in paper form, and the electronic version of the filing has been transmitted to the Commission.