

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**VERIZON’S FIRST SET OF DATA REQUESTS TO
FOOTHILLS RURAL TELEPHONE COOPERATIVE, INC.**¹

Pursuant to the Procedural Schedule contained in Appendix A to the Commission’s March 10, 2011 Order (“*Order*”), Verizon hereby submits its First Set of Data Requests. In accordance with the *Order*, responses should be provided no later than June 10, 2011.

DEFINITIONS

1. “You” and “your” refer to the legal entity that currently operates as an incumbent local exchange carrier in Kentucky and is subject to this proceeding, as well as its current and former officers, employees, representatives and agents, and all of its predecessors and successors in interest, affiliates, parents, subsidiaries, subdivisions and divisions, and others who are in possession of, or who may have obtained, information for or on behalf of any of the above mentioned persons or entities.

2. “Identify” means to describe in detail the information requested. For example, “identify,” when used in reference to a person or other entity, shall mean to state the full name and present or last known address for such person or entity, as well as the position or line of

¹ As used herein, “Verizon” refers collectively to MCImetro Transmission Access Transmission Services LLC d/b/a Verizon Access Transmission Services, 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 Service & Systems d/b/a Telecom*USA and Verizon Select Services, Inc.

business for such person or entity. “Identify,” when used in reference to an action, event, or occurrence, including a communication, meeting, or statement, shall mean to describe the action, event or occurrence by reference to, for example, its nature, subject matter, location and date and to state the participants in and witnesses to the action, event, or occurrence. “Identify,” when used in reference to a document, shall mean to state the date, author, signers and recipients of the document and to describe the type of document (*e.g.*, letter, memorandum, e-mail) and its custodian.

3. “Relate” or “relating” means containing, governing, showing, mentioning, referring, discussing or pertaining in any way, directly or indirectly, to the subject matter.

INSTRUCTIONS

1. Unless otherwise indicated by the Request, your responses shall include separate information for each of your relevant entities.

2. For each response, please repeat the discovery request and submit a complete response together with any and all documentation requested.

3. These Requests for Information are continuing in nature so as to require you to continually update your responses and promptly provide additional documents or information responsive to these requests when further information and documents are discovered or become known, directly or indirectly, to you, your agents, or attorneys. Should you not understand any particular request, please contact Verizon’s attorneys in this proceeding.

4. Please identify the name and telephone number of each person responsible for the content of each response, and the date upon which the response was prepared.

5. If any of the following data requests cannot be answered in full, please answer or produce to the extent possible, specifying the reason for your inability to answer the remainder or

to produce in full, and state whatever information or knowledge you have concerning the unanswered portion.

6. Terms used herein shall be construed to include their plural, and *vice versa*, so as to make the interrogatory or request for production inclusive rather than exclusive. Thus, the connectives “and,” “or,” and “and/or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed outside of its scope. Similarly, “each” as used herein includes the word “every” and *vice versa*, and “including” shall mean “including without limitation.”

May 2, 2011

Respectfully submitted,



C. Kent Hatfield
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000

David Haga
Assistant General Counsel
Verizon
1320 N. Courthouse Road, 9th Floor
Arlington, VA 22201
Telephone: (703) 351-3065

Counsel for MCImetro Transmission Access
Transmission Services LLC, MCI Communications
Services, Inc., Bell Atlantic Communications, Inc.,
NYNEX Long Distance Company, TTI National,
Inc., Teleconnect Long Distance Service & Systems
and Verizon Select Services, Inc.

DATA REQUESTS

1. Please identify the last time your Kentucky intrastate switched access rates were changed and the proceeding in which they were changed. If the change was pursuant to a tariff filing and not a formal proceeding, please identify the tariff filing. If your Kentucky intrastate switched access rates have remained constant since initially being established, please identify the date and the proceeding in which they were established.
2. Please identify all of the rate elements in your current Kentucky intrastate switched access rates, including but not limited to any Carrier Common Line (“CCL”) rate element.
3. Please identify your intrastate and interstate rate associated with each rate element identified in Request No. 2.
4. Please identify the interstate and intrastate tariffs supporting the rates identified in Request No. 2.
5. Please identify whether your Kentucky intrastate switched access rates contain any charges or other recovery for any Non-Traffic Sensitive Revenue Requirement (“NTSRR”). If so, please identify the rate or amount of your NTSRR charges, fully describe how they are assessed (e.g., on a monthly or per minute basis), and identify the intrastate switched access rate elements containing or reflecting any NTSRR charges or recovery.
6. Please identify what percentage of your total Kentucky intrastate switched access revenues for each of 2008, 2009 and 2010 were derived from NTSRR charges or recovery.
7. Please identify what percentage of your total Kentucky intrastate revenues for each of 2008, 2009 and 2010 were derived from intrastate switched access charges.
8. Please identify what percentage of your total revenues for each of 2008, 2009 and 2010 were derived from (i) intrastate switched access charges and (ii) interstate switched access charges.
9. Please identify what percentage of your total revenues for each of 2008, 2009 and 2010 were derived from the federal universal service fund.
10. Please identify the rate(s) you charge for basic local exchange service, as that term is defined by KRS 278.541(1).
11. Please identify the total number of access lines you had in Kentucky as of December 31, 2008, December 31, 2009, and December 31, 2010.

CERTIFICATE OF SERVICE

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

A handwritten signature in black ink, appearing to read "Douglas F. Brent", with a long horizontal stroke extending to the right.

Douglas F. Brent