

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

**In the Matter of:**

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

**VERIZON’S RESPONSES TO TWTC, LEVEL 3 AND PAETEC’S SECOND SET OF  
DATA REQUESTS**

In accordance with the Procedural Schedule contained in Appendix A to the Commission’s March 10, 2011 *Order*, Verizon<sup>1</sup> hereby provides its responses to the data requests served by TWTC, Level 3 and PAETEC on August 5, 2011.

**GENERAL OBJECTION**

The issue before the Commission in this proceeding is whether the regulated intrastate switched access rates charged by Kentucky local exchange carriers are just and reasonable. Information regarding the rates that other carriers (*i.e.*, access payors) charge for other services is not relevant to that issue. Verizon therefore objects to each and every data request that seeks information regarding its nonbasic retail services (*e.g.*, intrastate long distance services), as that information will not assist the Commission in determining whether other carriers’ intrastate switched access rates are just and reasonable.

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<sup>1</sup> 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.

## **RESPONSES TO DATA REQUESTS**

**REQUEST NO. 1:** Do you (or an affiliate) accept residential customers' presubscription to your intrastate long distance service in the area in circumstances where the customer does not also purchase local exchange service from Verizon or an affiliate? If yes, please provide a link to a webpage (or similar citation to a publicly-available electronic document) that describes each residential intrastate long distance service available to such customers.

**Responsible Party:** Don Price.

**RESPONSE:** Yes. MCI Communications Services, Inc. currently offers intrastate long distance service to Kentucky customers on a presubscribed basis. Information and rates for all currently available plans in Kentucky are available using this link:  
[http://consumer.mci.com/res\\_long\\_distance/index.html](http://consumer.mci.com/res_long_distance/index.html).

**REQUEST NO. 2:** On July 29, 2011, a group of six companies including you or your affiliate filed “America’s Broadband Connectivity Plan” (ABC Plan) in FCC WC Docket No. 10-90 *et al.* Provide any estimate or analysis, and the supporting spreadsheets, assumptions, calculations, formulae and other work papers, of the effect the ABC Plan would have on Kentucky.

**Responsible Party:** Counsel for Verizon and Don Price.

**RESPONSE:** On August 16, 2011, the ABC plan group provided certain data to the Federal Communications Commission regarding the amount of support that would be provided under the ABC Plan on a state-by-state basis, including for Kentucky. *See* Exhibit 1, Attachment B.

September 2, 2011

Respectfully submitted,



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Inc., Teleconnect Long Distance Service & Systems  
and Verizon Select Services, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that the electronic version of this filing made with the Commission on September 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.

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Douglas F. Brent