

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSES AND OBJECTIONS OF
LESLIE COUNTY TELEPHONE COMPANY, LEWISPORT TELEPHONE COMPANY
AND SALEM TELEPHONE COMPANY
TO AT&T'S FIRST SET OF DATA REQUESTS
PUBLIC VERSION

In accordance with the Procedural Schedule contained in Appendix A to the Commission's March 10, 2011 Order, Leslie County Telephone Company, Lewisport Telephone Company and Salem Telephone Company (collectively "TDS Telecom" or "TDS Companies") hereby provides its responses and objections to the First Set of Data Requests served by BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky, AT&T Communications of the South Central States, LLC, BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Services, and TCG Ohio (collectively "AT&T") on May 2, 2011.

GENERAL OBJECTIONS

1. The TDS Companies objects to the Data Requests of AT&T to the extent they purport to impose upon the TDS Companies any different or additional obligations from those imposed under Kentucky Revised Statutes and Kentucky Public Service Commission

(“Commission”) regulations. In responding to this discovery, the TDS Companies intend to and will respond in accordance with standard and acceptable Commission practice.

2. The TDS Companies object to each request to the extent that it seeks documents or information equally available through public sources or records because such requests subject the TDS Companies to unreasonable and undue annoyance oppression, burden and expense. The TDS Companies will refer the propounder to publicly available documents on record at the Commission, or to any other publicly available source.

3. The TDS Companies object to each request to the extent that it seeks to impose an obligation on the TDS Companies to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Commission or are not parties to this proceeding on the grounds that such discovery is overly broad, unduly burdensome, oppressive, irrelevant and not likely to lead to the discovery of relevant or admissible evidence, and not permitted by applicable discovery rules.

4. The TDS Companies object to each request to the extent it seeks information that requires complex responses. The function of interrogatories is to pose simple questions relating to a particular subject matter that may be answered by a brief categorical statement.

5. The TDS Companies have interpreted each request to apply to the TDS Companies’ regulated intrastate operations in Kentucky and will limit their responses accordingly. To the extent any request is intended to apply to matters that take place outside of the Commonwealth of Kentucky and which are not related to Kentucky intrastate operations subject to the jurisdiction of the Commission and are not the subject of this proceeding, the TDS Companies object to each such request as irrelevant, overly broad, unduly burdensome, not likely to lead to the discovery of relevant or admissible evidence, and oppressive.

6. The TDS Companies object to each request to the extent it seeks information not reasonably calculated to lead to the discovery of admissible evidence and not relevant or material to the subject matter of this proceeding.

7. The TDS Companies object to each request to the extent it is duplicative and overlapping, cumulative of another request, overly broad, and/or seek responses in a manner that is unduly burdensome, expensive, oppressive, or excessively time consuming to the TDS Companies to produce.

8. The TDS Companies object to each request to the extent it seeks to obtain "all," "each," or "every" document, item, customer, or other such piece of information because such discovery is overly broad and unduly burdensome.

9. The TDS Companies object to each request as overly broad and unduly burdensome to the extent such request seeks to have the TDS Companies create documents not in existence at the time of the request, or to produce documents not in the TDS Companies' possession, custody or control. The TDS Companies further object to each request to the extent it seeks an analysis, calculation, or compilation which The TDS Companies has not performed previously.

10. The TDS Companies object to each request as overly broad and unduly burdensome to the extent it is not limited to any stated period of time, or it pertains to a stated period of time that is longer than is relevant for purposes of the issues in this proceeding.

11. The TDS Companies object to each request to the extent that it seeks to require information regarding "all persons." Such a request is unduly burdensome.

12. To the extent that any requested information is confidential and/or contains proprietary information, the TDS Companies will only produce it pursuant to a Protective

Agreement. Any and all confidential and/or proprietary information produced by the TDS Companies in this proceeding is subject to a Protective Agreement.

13. The TDS Companies object to the extent that any request seeks information subject to the attorney/client privilege, attorney work-product exemption, or other applicable privileges or immunities from disclosure, as contrary to the laws and rules governing privilege and exemption.

14. The objections, responses, and documents produced in response to each request are not intended nor should be construed in any manner to waive the TDS Companies right to object to any and all requests as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at the hearing of this or any other proceeding.

15. The TDS Companies object to the extent that the Instructions seek to place a continuing obligation upon the TDS Companies to update each response. To the extent that AT&T seeks updated information, AT&T should update its data requests.

RESPONSES TO DATA REQUESTS

Request No. 1: 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 nontraditional 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 nontraditional 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 Person: Bruce Mottern

Objections: The TDS Companies’ General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting the TDS Companies to seek out and identify “revenue-producing retail access lines” for the ten year period 2001 through 2011 to date is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. The TDS Companies will agree to provide information for 2008 through 2011 year-to-date. With respect to 1(c) and 1(d), the TDS Companies interprets this request to relate

to local exchange service sold in a bundle. The TDS Companies do not track access lines on the basis of whether the line is priced to the end user as a stand alone product or in a bundle.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-1.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-1.

Salem Telephone Company Response:

See Attachment TDS/ATT Set I-1.

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Request No. 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting the TDS Companies to seek out and identify "average monthly revenue per line" disaggregated into the categories specified in Request No. 1 for the ten year period 2001 through 2011 to date is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Moreover, the request does not limit the revenue to that regulated by the Commission. The TDS Companies will agree to provide average annual regulated intrastate revenue per line for 2008 through 2011 year-to-date.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-2.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-2.

Salem Telephone Company Response:

See Attachment TDS/ATT Set I-2.

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Request No. 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

None

Lewisport Telephone Company Response:

None

Salem Telephone Company Response:

None

Request No. 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting "the "calculated weighted average local rate per line per month" segregated by the line types set forth in Request No. 1 is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies.

Leslie County Telephone Company Response:

The company does not possess and has not undertaken the investigation. See, however, the TDS Companies' response to AT&T Request Nos. 1 and 2.

Lewisport Telephone Company Response:

The company does not possess and has not undertaken the investigation. See, however, the TDS Companies' response to AT&T Request Nos. 1 and 2.

Salem Telephone Company Response:

The company does not possess and has not undertaken the investigation. See, however, the TDS Companies' response to AT&T Request Nos. 1 and 2.

Request No. 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

Not applicable.

Lewisport Telephone Company Response:

Not applicable.

Salem Telephone Company Response:

Not applicable.

Request No. 6: For 2010, and 2011 most current data available, please separately identify:

- (a) All support received from each of the Federal Universal Service Fund(s);
- (b) All payments into the Federal Universal Service Fund(s);

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-6.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-6.

Salem Telephone Company Response:

See Attachment TDS/ATT Set I-6.

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Request No. 7: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

The TDS Companies object on the following additional grounds that requesting intraMTA minutes terminated and billed "on behalf of all wireless carriers" is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce and requires an the making of an unreasonable investigation by the TDS Companies. Moreover, the topic of intraMTA wireless traffic is irrelevant to this investigation, inasmuch as intraMTA wireless traffic is not subject to access charges according to rulings of the Federal Communications Commission. The subject of non-wireless traffic billed at reciprocal compensation rates is similarly irrelevant to the topic of this investigation.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-7.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-7.

Salem Telephone Company Response:

See Attachment TDS/ATT Set 1-7.

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Request No. 8: What rate(s) do you charge for termination of intraMTA wireless calls?

Provide the source showing the basis for each such rate(s).

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting intraMTA minutes terminated and billed "on behalf of all wireless carriers" is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce and requires an the making of an unreasonable investigation by the TDS Companies. Moreover, the topic of intraMTA wireless traffic is irrelevant to this investigation, inasmuch as intraMTA wireless traffic is not subject to access charges according to rulings of the Federal Communications Commission. The subject of non-wireless traffic billed as reciprocal compensation is similarly irrelevant to the topic of this investigation.

Leslie County Telephone Company Response:

The company's wireless interconnection agreements are on file with the Kentucky PSC.

Lewisport Telephone Company Response:

The company's wireless interconnection agreements are on file with the Kentucky PSC.

Salem Telephone Company Response:

The company's wireless interconnection agreements are on file with the Kentucky PSC.

Request No. 9: What rate(s) do you charge for termination of VoIP calls originated by VoIP providers?

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

Terminating VOIP calls are billed either interstate or intrastate tariffed switched access charges depending on the call jurisdiction determined by the calling and called party numbers.

Lewisport Telephone Company Response:

Terminating VOIP calls are billed either interstate or intrastate tariffed switched access charges depending on the call jurisdiction determined by the calling and called party numbers.

Salem Telephone Company Response:

Terminating VOIP calls are billed either interstate or intrastate tariffed switched access charges depending on the call jurisdiction determined by the calling and called party numbers.

Request No. 10: How many Lifeline access lines were provided by you for 2010 and for 2011 most recent data available?

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

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Lewisport Telephone Company Response:

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Salem Telephone Company Response:

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Request No. 11: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting switched access revenues and minutes broken down into a matrix by type of provider and rate element billed for each year from 2001 through 2011 to date is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. The TDS Companies do not maintain the information in the form requested and, therefore, are not able to respond in the microdetail requested by AT&T. The TDS Companies will provide total revenues and minutes for the period 2008 through 2011

year-to-date for the categories of intrastate terminating and originating and interstate originating and terminating.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-11.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-11.

Salem Telephone Company Response:

See Attachment TDS/ATT Set I-11.

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Request No. 12: For 2010, and for 2011 most recent data available, for you and your non-ILEC 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting data involving payments for intrastate originating and terminating and interstate originating and terminating switched access broken down by each carrier and then grouped by category is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Moreover, the TDS Companies object to the inclusion of "your non-ILEC affiliates" within the scope of the response and the TDS Telecom Kentucky ILECs only will be responding.

Leslie County Telephone Company Response:

- (a) None.
- (b) None.
- (c) Objection.

Lewisport Telephone Company Response:

- (a) None.

- (b) None.
- (c) Objection.

Salem Telephone Company Response:

- (a) None.
- (b) None.
- (c) Objection.

Request No.13: 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 Person: Bruce Mottern

Objections: The TDS Companies’ General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting “separate estimates of the percentage of terminating intercarrier traffic” received by the three TDS Telecom Kentucky ILECs, parent company and affiliates “receive both in Kentucky and nationwide that lacks sufficient call detail or signaling information” is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce and requires the making of an unreasonable investigation by the TDS Companies. Only the TDS Telecom Kentucky ILECs will be responding to this request.

Response of Leslie County, Lewisport and Salem Telephone Companies:

a) Identification of the carrier financially responsible for intercarrier charges is based upon the owner of the direct trunk into the tandem or end office. Where TDS Telecom terminates the usage via a direct trunk with a carrier, TDS Telecom is able to determine the financially responsible carrier. Leslie County has direct trunks with three carriers, all other traffic for Leslie County and all traffic for Lewisport and Salem are terminated over common trunk groups with an AT&T tandem. In the case of common trunk groups, TDS Telecom relies on records provided by the tandem company to identify the financially responsible carrier. TDS

Telecom does not know the percentage of terminating traffic delivered over the common trunk group for which no billing record is received from the tandem operator.

b) Determination of the proper compensation regime is determined based on the jurisdiction of the call. When call records contain a valid originating and terminating number for wireline originated calls or valid originating LRN and terminating number for wireless originated calls, the jurisdiction can be determined. The percentage of terminating intercarrier traffic that does not contain information in the call records necessary to properly jurisdictionalize the traffic (YTD 2011) is:

Leslie County Telephone Company – 25.36%
Lewisport Telephone Company – 30.87%
Salem Telephone Company – 33.97%

Request No. 14: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Response of Leslie County, Lewisport and Salem Telephone Companies:

Where TDS Telecom is unable to determine the traffic jurisdiction based on the call records, the usage is allocated between the various jurisdictions using factors. For access traffic, the provisions in Lewisport Telephone Company Intrastate Access Service Tariff PSC KY No. 3, Section 2.3.11(C) Jurisdictional Reports- Switched Access apply. Leslie County and Salem Telephone Companies concur in Lewisport's Intrastate access tariff. For reciprocal compensation traffic, jurisdictional factor reporting is negotiated in interconnection agreements on file with the KY PSC.

Request No. 15: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Response of Leslie County, Lewisport and Salem Telephone Companies:

As TDS Telecom becomes aware that certain traffic may be mischaracterized, it is investigated. Some portion of traffic is received in a manner such that it is improperly attributed to one compensation regime or another. However the percentage of such mischaracterized intercarrier compensation traffic is unknown and cannot be estimated.

Request No. 16: Have you, your parent companies and/or affiliates filed any appeals of FCC Orders that established your interstate switched access rates?

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting to know whether "you, your parent companies and/or affiliates" have filed appeals is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Only the TDS Telecom Kentucky ILECs will respond to this request.

Leslie County Telephone Company Response:

No.

Lewisport Telephone Company Response:

No.

Salem Telephone Company Response:

No.

Request No. 17: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

No, as stated. Federal compensation for switched access is a combination of tariffed rates **and** federal USF support elements.

Lewisport Telephone Company Response:

No, as stated. Federal compensation for switched access is a combination of tariffed rates **and** federal USF support elements.

Salem Telephone Company Response:

No, as stated. Federal compensation for switched access is a combination of tariffed rates **and** federal USF support elements.

Request No. 18: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

- (a) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (b) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (c) No. However, pricing differs among various services for valid policy, legal and other reasons.

- (d) No. However, pricing differs among various services for valid policy, legal and other reasons.

Lewisport Telephone Company Response:

- (a) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (b) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (c) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (d) No. However, pricing differs among various services for valid policy, legal and other reasons.

Salem Telephone Company Response:

- (a) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (b) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (c) No. However, pricing differs among various services for valid policy, legal and other reasons.
- (d) No. However, pricing differs among various services for valid policy, legal and other reasons.

Request No. 19: 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 and list the applicable docket numbers or code citations;
- (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 Person: Bruce Mottern

Objections: The TDS Companies’ General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting to know whether “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” is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Moreover, the TDS Companies object to responding on behalf of “your parent companies or affiliates” and the answers are provided only by the TDS Telecom Kentucky ILECs.

Leslie County Telephone Company Response:

- (a) None.
- (b) None.
- (c) Not applicable.

(d) Not applicable.

Lewisport Telephone Company Response:

(a) None.

(b) None.

(c) Not applicable.

(d) Not applicable.

Salem Telephone Company Response:

(a) None.

(b) None.

(c) Not applicable.

(d) Not applicable.

Request No. 20: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

No.

Lewisport Telephone Company Response:

No.

Salem Telephone Company Response:

No.

Request No. 21: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

The TDS Companies object on the following additional grounds that requesting identification of an affiliate that provides inter and intrastate toll services is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. The TDS Companies object to providing information regarding affiliate operations and will respond to this interrogatory only on behalf of the TDS Telecom Kentucky ILECs.

Leslie County Telephone Company Response:

No.

Lewisport Telephone Company Response:

No.

Salem Telephone Company Response:

No.

Request No. 22: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting the companies to identify inter and intrastate toll minutes and revenues "for you and your affiliates" for the period 2001 through 2011 year-to-date is over-broad, causing an unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. The TDS Companies will not provide information regarding affiliates.

Leslie County Telephone Company Response:

None.

Lewisport Telephone Company Response:

None.

Salem Telephone Company Response:

None.

Request No. 23: Do you have any elasticity studies for local or toll services? If so, please produce copies of those.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

No.

Lewisport Telephone Company Response:

No.

Salem Telephone Company Response:

No.

Request No. 24: 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 Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting "total amount of revenues and volumes for retail vertical services" for the period 2001 through 2011 year-to-date is over-broad, causing unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Therefore, the TDS Companies will agree to provide 2010 and year-to-date 2011 data.

Leslie County Telephone Company Response:

See Attachment TDS/ATT Set I-24.

Lewisport Telephone Company Response:

See Attachment TDS/ATT Set I-24.

Salem Telephone Company Response:

See Attachment TDS/ATT Set I-24.

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Request No. 25: Provide a schedule reflecting your local rates for residential and business customers by rate group from 1985 to the present.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that requesting TDS Companies compile a schedule "reflecting your local rates for residential and business customers by rate group from 1985 to the present" is over-broad, causing an unreasonable annoyance, oppression, burden and expense to produce, and requires the making of an unreasonable investigation by the TDS Companies. Moreover, the information is

Leslie County Telephone Company Response:

The company's local service tariff, current and past, is publically available at the Commission.

Lewisport Telephone Company Response:

The company's local service tariff, current and past, is publically available at the Commission.

Salem Telephone Company Response:

The company's local service tariff, current and past, is publically available at the Commission.

Request No. 26: For Windstream: Please verify that all discovery responses and documents that Windstream provided in Docket No. 2007-00503 remain accurate, true and correct. If there is any response or information that is no longer accurate, true and correct, please identify that and provide updated responses and information.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference.

Leslie County Telephone Company Response:

Not applicable.

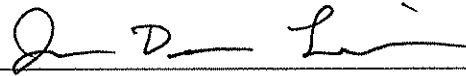
Lewisport Telephone Company Response:

Not applicable.

Salem Telephone Company Response:

Not applicable.

Respectfully submitted,



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Date: June 10, 2011