

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 CLECS' 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 tw telecom of Kentucky, llc, Level 3 Communications, LLC and US LEC of Tennessee L.L.C. d/b/a PAETEC Business Services (collectively "CLECs") on May 2, 2011.

GENERAL OBJECTIONS

1. The TDS Companies object to the Data Requests of CLECs 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.

RESPONSES TO DATA REQUESTS

Request No. 1: State your switched access minutes, by month, for the past five years.

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 minutes by month for the past five years is over-broad, causes unreasonable annoyance, oppression, burden and expense to produce and requires the making of an unreasonable investigation by the TDS Companies. The TDS Companies will respond by supplying switched access minutes, by year, for the period 2008-2011 to date.

Leslie County Telephone Company Response:

2008	2009	2010	May 2011 YTD
X	X	X	X

Lewisport Telephone Company Response:

2008	2009	2010	May 2011 YTD
X	X	X	X

Salem Telephone Company Response:

2008	2009	2010	May 2011 YTD
X	X	X	X

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Request No. 2: Provide your average interstate and intrastate switched access charges per minute, by month for the past five years.

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 average interstate and intrastate switched access charges per minute by month for the past five years 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 this analysis.

Lewisport Telephone Company Response:

The company does not possess and has not undertaken this analysis.

Salem Telephone Company Response:

The company does not possess and has not undertaken this analysis.

Request No. 3: For 2010, what was your company's total intrastate switched access revenue, by rate element, from all recurring switched access rate elements billed (including switched dedicated elements that are priced on a flat-rate basis)?

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

Attachment TDS/CLEC Set I-3 - CONFIDENTIAL.

Lewisport Telephone Company Response:

Attachment TDS/CLEC Set I-3 - CONFIDENTIAL.

Salem Telephone Company Response:

Attachment TDS/CLEC Set I-3 - CONFIDENTIAL.

Request No. 4: For each rate element identified in Request #3 above, provide the intrastate billed demand for each rate element for 2010.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

Attachment TDS/CLEC Set I-4 - CONFIDENTIAL.

Lewisport Telephone Company Response:

Attachment TDS/CLEC Set I-4 - CONFIDENTIAL.

Salem Telephone Company Response:

Attachment TDS/CLEC Set I-4 - CONFIDENTIAL.

Request No. 5: Identify any differences in rate structure between your interstate and intrastate switched access tariffs.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company's switched access rates are published in publically available tariffs.

Lewisport Telephone Company Response:

The company's switched access rates are published in publically available tariffs.

Salem Telephone Company Response:

The company's switched access rates are published in publically available tariffs.

Request No. 6: Provide a comparison of your interstate and intrastate switched access rates by rate element for 2009 and 2010.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

See response to Request No. 5.

Lewisport Telephone Company Response:

See response to Request No. 5.

Salem Telephone Company Response:

See response to Request No. 5.

Request No. 7: Provide a year-end income statement and balance sheet for your company for the past five years.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company's annual financial report to the Commission, which includes an income statement and balance sheet, is publically available on the Commission's website.

Lewisport Telephone Company Response:

The company's annual financial report to the Commission, which includes an income statement and balance sheet, is publically available on the Commission's website.

Salem Telephone Company Response:

The company's annual financial report to the Commission, which includes an income statement and balance sheet, is publically available on the Commission's website.

Request No. 8: Provide the return on equity and return on rate base — total company and Kentucky intrastate only — for each year for the past five years.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that the request seeks information not relevant to this proceeding.

Leslie County Telephone Company Response:

See response to Request No. 7. A return can be calculated from the company's annual report. This would not replicate, however, a rate case result. The company does not possess and has not undertaken such an analysis.

Lewisport Telephone Company Response:

See response to Request No. 7. A return can be calculated from the company's annual report. This would not replicate, however, a rate case result. The company does not possess and has not undertaken such an analysis.

Salem Telephone Company Response:

See response to Request No. 7. A return can be calculated from the company's annual report. This would not replicate, however, a rate case result. The company does not possess and has not undertaken such an analysis.

Request No. 9: State the number of access lines subscribing to stand-alone basic local service (that is, without any additional optional features or services, including DSL) at year end, for each of the past five years.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that the request 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:

TDS Telecom does not separately track stand-alone access lines.

Lewisport Telephone Company Response:

TDS Telecom does separately not track stand-alone access lines.

Salem Telephone Company Response:

TDS Telecom does not separately track stand-alone access lines.

Request No. 10: Does your company or an affiliate provide DSL? If the answer is yes,

provide:

- a. The number of residential and business lines that subscribe to DSL service;
- b. The average monthly price for DSL for 2011; and
- c. If an affiliate provides DSL, how the ILEC company is compensated (including structure and level) for the use of the local loop to provide DSL.

Responsible Person: Bruce Mottern

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

The TDS Companies object on the following additional grounds that the request seeks information not relevant to this proceeding. Moreover, DSL is an interstate service and not within the jurisdiction of this Commission. The TDS Companies further object to providing information regarding affiliates. As such, the TDS Companies will not be responding to this request.

Leslie County Telephone Company Response:

Objection.

Lewisport Telephone Company Response:

Objection.

Salem Telephone Company Response:

Objection.

Request No. 11: What is the monthly recurring price (at year-end 2010) and number of units sold (during calendar year 2010) for each bundle or package that includes basic local service?

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

Refer to the company's General Exchange Tariff.

Lewisport Telephone Company Response:

Refer to the company's General Exchange Tariff.

Salem Telephone Company Response:

Refer to the company's General Exchange Tariff.

Request No. 12: State the current level of basic local service and the corresponding interstate SLC, assuming no additional features are purchased by the customer.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company's basic local service rates are found in the General Exchange Tariff on file with the PSC. The company's SLC rate is listed in the NECA Tariff No. 5, Section 17.

Lewisport Telephone Company Response:

The company's basic local service rates are found in the General Exchange Tariff on file with the PSC. The company's SLC rate is listed in the NECA Tariff No. 5, Section 17.

Salem Telephone Company Response:

The company's basic local service rates are found in the General Exchange Tariff on file with the PSC. The company's SLC rate is listed in the NECA Tariff No. 5, Section 17.

Request No. 13: Provide your average revenue per residential and switched access line for each of the past five years, including all revenues for optional retail services in the numerator. Identify all additional features and services for which revenues were collected in each year.

Responsible Person: Bruce Mottern

Objections: The TDS Companies' General Objections are incorporated by reference. The TDS Companies object on the following additional grounds that the request 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 provide the information requested for the period 2008 through 2011 to date.

Leslie County Telephone Company Response:

Attachment TDS/CLEC Set I-13 - CONFIDENTIAL.

Lewisport Telephone Company Response:

Attachment TDS/CLEC Set I-13 - CONFIDENTIAL.

Salem Telephone Company Response:

Attachment TDS/CLEC Set I-13 - CONFIDENTIAL.

Request No. 14: With respect to the access revenue shift estimate and numbers you filed with the Commission on or about April 15, 2011, provide all workpapers for each such estimate or number, including spreadsheets, calculations, and input data.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

See Attachment TDS/CLEC Set I-14.1 - CONFIDENTIAL.

Lewisport Telephone Company Response:

See Attachment TDS/CLEC Set I-14.2 - CONFIDENTIAL.

Salem Telephone Company Response:

See Attachment TDS/CLEC Set I-14.3 - CONFIDENTIAL.

Respectfully submitted,



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