

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 VERIZON'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 the "TDS Companies") hereby provide their responses and objections to the First Set of Data Requests served by 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. (collectively "Verizon") on May 2, 2011.

GENERAL OBJECTIONS

1. The TDS Companies object to the Data Requests of Verizon 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 accepted 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 Verizon seeks updated information, Verizon should update its data requests.

RESPONSES TO DATA REQUESTS

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company's access rates are tariffed before the Commission and are publically available at the Commission's website.

Lewisport Telephone Company Response:

The company's access rates are tariffed before the Commission and are publically available at the Commission's website.

Salem Telephone Company Response:

The company's access rates are tariffed before the Commission and are publically available at the Commission's website.

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

See response to Request No. 1.

Lewisport Telephone Company Response:

See response to Request No. 1.

Salem Telephone Company Response:

See response to Request No. 1.

Request No. 3: Please identify your intrastate and interstate rate associated with each rate element identified in Request No. 2.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

See response to Request No. 1.

Lewisport Telephone Company Response:

See response to Request No. 1.

Salem Telephone Company Response:

See response to Request No. 1.

Request No. 4: Please identify the interstate and intrastate tariffs supporting the rates identified in Request No. 2.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

See response to Request No. 1. The company's interstate switched access tariff is publically available at the FCC and can also be found at www.neca.org.

Lewisport Telephone Company Response:

See response to Request No. 1. The company's interstate switched access tariff is tariff is publically available at the FCC and can also be found at www.neca.org.

Salem Telephone Company Response:

See response to Request No. 1. The company's interstate switched access tariff is publically available at the FCC and can also be found at www.neca.org.

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company’s NTSRR rate per Access Line is tariffed before the Commission, which is publically available at the Commission’s website. The company utilizes the Per Minute Rate Method provision of the tariff to assess NTSRR charges on a per terminating minute basis, which is combined with the terminating Carrier Common Line rate.

Lewisport Telephone Company Response:

The company’s NTSRR rate per Access Line is tariffed before the Commission, which is publically available at the Commission’s website. The company utilizes the Per Minute Rate Method provision of the tariff to assess NTSRR charges on a per terminating minute basis, which is combined with the terminating Carrier Common Line rate.

Salem Telephone Company Response:

The company’s NTSRR rate per Access Line is tariffed before the Commission, which is publically available at the Commission’s website. The company utilizes the Per Minute Rate Method provision of the tariff to assess NTSRR charges on a per terminating minute basis, which is combined with the terminating Carrier Common Line rate.

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

2008	2009	2010
X	X	X

Lewisport Telephone Company Response:

2008	2009	2010
X	X	X

Salem Telephone Company Response:

2008	2009	2010
X	X	X

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

2008	2009	2010
X	X	X

Lewisport Telephone Company Response:

2008	2009	2010
X	X	X

Salem Telephone Company Response:

2008	2009	2010
X	X	X

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

Jurisdiction	2008	2009	2010
Intrastate	X	X	X
Interstate	X	X	X

Lewisport Telephone Company Response:

Jurisdiction	2008	2009	2010
Intrastate	X	X	X
Interstate	X	X	X

Salem Telephone Company Response:

Jurisdiction	2008	2009	2010
Intrastate	X	X	X
Interstate	X	X	X

Request No. 9: Please identify what percentage of your total revenues for each of 2008, 2009 and 2010 were derived from the federal universal service fund.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

2008	2009	2010
X	X	X

Lewisport Telephone Company Response:

2008	2009	2010
X	X	X

Salem Telephone Company Response:

2008	2009	2010
X	X	X

Request No. 10: Please identify the rate(s) you charge for basic local exchange service, as that term is defined by KRS 278.541(1).

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

The company's rates for local exchange service are tariffed by the Commission and publically available on the Commission's website.

Lewisport Telephone Company Response:

The company's rates for local exchange service are tariffed by the Commission and publically available on the Commission's website.

Salem Telephone Company Response:

The company's rates for local exchange service are tariffed by the Commission and publically available on the Commission's website.

Request No. 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.

Responsible Person: Bruce Mottern

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

Leslie County Telephone Company Response:

2008	2009	2010
X	X	X

Lewisport Telephone Company Response:

2008	2009	2010
X	X	X

Salem Telephone Company Response:

2008	2009	2010
X	X	X

Respectfully submitted,



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