COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

PEOPLES RURAL'S RESPONSES TO AUGUST 5, 2011 DATA REQUESTS

Peoples Rural Telephone Cooperative, Inc. ("Peoples Rural"), by counsel, and pursuant to the March 10, 2011 procedural order (the "Order") entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter, hereby responds to the following August 5, 2011 data requests propounded upon it by AT&T,[1] TWTC/Level 3/PAETEC,[2] and Sprint[3]

Responses to these data requests are contained in the following sections of this document, with each section being numbered in accordance with the served requests.

- **Section I: August 5, 2011 Data Requests from AT&T**;
- **Section II: August 5, 2011 Data Requests from TWTC/Level 3/PAETEC**; and
- **Section III: August 5, 2011 Data Requests from Sprint.**

[1] 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 Service, and TCG Ohio (collectively, "AT&T").
[2] tw telecom, llc, Level 3 Communications, LLC, and U.S. LEC of Tennessee L.L.C. d/b/a PAETEC Business Services (collectively, "TWTC/Level 3/PAETEC").
[3] Sprint Communications Company L.P.; Sprint Spectrum, L.P. and Sprint Com, Inc. d/b/a Sprint PCS; Nextel West Corp., Inc.; and NPCR, Inc., d/b/a Nextel Partners.

I.

AUGUST 5, 2011 DATA REQUESTS FROM AT&T

AT&T

REQUEST NO. 1: Gregory Hale in his Direct Testimony at page 10 says, "For the many miles in between, the wireless call actually travels over traditional wireline facilities."

a. Does the term "miles in between" refer to transport backhaul of traffic from wireless and other technologies? Please explain in detail what services and facilities are provided to wireless carriers for the wireless calls that travel over traditional wireline facilities.

b. Are the facilities used for the traffic referenced as "miles in between" billed pursuant to a tariff as switched access or special access services? If neither, how are they billed?

OBJECTION: Mr. Hale's testimony speaks for itself, and he will be available for cross-examination at the hearing in this matter. In addition, because Mr. Hale's testimony referred to wireless calls, the reference to "wireless and other technologies" is unduly vague and ambiguous. This question is also misdirected and assumes facts not in evidence insofar as the RLECs do not transit or otherwise deliver wireless-to-wireless calls. Without waiving these objections, Peoples Rural states as follows.

RESPONDENT: **Gregory Hale (Witness)**

RESPONSE:

1(a): Wireless-to-wireless calls typically travel over wireline facilities for that portion of the network between call receipt by a wireless tower and call delivery by a wireless tower. That is, wireless calls are not typically transferred from wireless antenna to wireless antenna without the use of some wireline facilities. The specific services and facilities used to deliver calls of this nature vary depending on the carriers and network arrangements involved.

1(b): The RLECs do not typically transit wireless-to-wireless calls. Normally a wireless carrier would order facilities (DS1's, DS3's or Ethernet circuits) into a cell site and it would be billed as special access.

II.

AUGUST 5, 2011 DATA REQUESTS FROM TWTC/Level 3/PAETEC

TWTC/Level 3/PAETEC

REQUEST NO. 1: State, for calendar years 2009 and 2010 separately, the amount of access revenue shift you would have experienced if your **intrastate terminating** switched access rates mirrored your **interstate terminating** switched access rates.

OBJECTION: This request is unduly burdensome because the information sought can be derived from information already provided. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Jodi Gabbard, CABS Coordinator, Peoples Rural Telephone Cooperative Corporation, Inc.**

RESPONSE: The underlying data necessary to perform this analysis is contained in previous responses to data requests. *See* Response to May 2, 2011 TWTC/Level 3/PAETEC Requests No. 2-3; *see also* Response to August 5, 2011 TWTC/Level 3/PAETEC Request No. 2, below.

TWTC/Level 3/PAETEC

REQUEST NO. 2: Provide the number of your **terminating** interstate and intrastate access minutes for 2009 and for 2010 (separately).

OBJECTION: This request is unduly burdensome because the information sought can be derived from information already provided. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Jodi Gabbard, CABS Coordinator, Peoples Rural Telephone Cooperative Corporation, Inc.**

RESPONSE: For 2010 intrastate data, *see* Response to May 2, 2011 TWTC/Level 3/PAETEC Request No. 4.

2009: [redacted] intrastate; [redacted] interstate

2010: [redacted] interstate

TWTC/Level 3/PAETEC

REQUEST NO. 3: State, for calendar years 2009 and 2010 separately, the amount of access revenue shift you would have experienced if your intrastate and interstate **terminating** switched access rates mirrored your **reciprocal compensation** rates.

OBJECTION: This request is unduly burdensome because the information sought can be derived from information already provided. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Jodi Gabbard, CABS Coordinator, Peoples Rural Telephone Cooperative Corporation, Inc.**

RESPONSE: The underlying data necessary to perform this analysis is contained in previous responses to data requests. *See* Response to May 2, 2011 TWTC/Level 3/PAETEC Requests No. 1-2; *see also* Response to May 2, 2011 AT&T Request No. 7.

TWTC/Level 3/PAETEC

REQUEST NO. 4: Provide the number of your **reciprocal compensation** minutes for 2009 and for 2010 (separately). This request is for the number of minutes on which you assess reciprocal compensation charges, not the number of minutes on which you paid reciprocal compensation.

OBJECTION: This request is unduly burdensome because the information sought can be derived from information already provided. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Jodi Gabbard, CABS Coordinator, Peoples Rural Telephone Cooperative Corporation, Inc.**

RESPONSE: For 2010 data, *see* Response to May 2, 2011 AT&T Request No. 7.

2009: [redacted]

TWTC/Level 3/PAETEC

REQUEST NO. 5: Produce all workpapers, calculations, and formulas — in native format, including spreadsheets (Excel preferred) — for the revenue shift numbers stated in requests #1 and #3 above.

OBJECTION: This request is unduly burdensome because the information sought can be derived from information already provided. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Jodi Gabbard, CABS Coordinator, Peoples Rural Telephone Cooperative Corporation, Inc.**

RESPONSE: Not applicable.

III.

AUGUST 5, 2011 DATA REQUESTS FROM SPRINT

SPRINT

REQUEST NO. 1: At page 8, lines 19-21 of his Direct Testimony, Mr. Staurulakis states: "Given the potential shift in cost recovery to end user customers being considered by the FCC, the RLECs believe that the pace of basic local service disconnection will accelerate."

a. Please provide any and all studies developed by or on behalf of the RLECs, either individually, or collectively, that demonstrate line losses will increase with local rate increases.

b. If studies exist, did the study(s) consider the impact of the FCC's plans on broadband take rates? Please disclose any and all findings.

c. If studies exist, did the study(s) consider the impact of the FCC's plans on broadband prices? Please disclose any and all findings.

OBJECTION: Mr. Staurulakis's testimony speaks for itself, and he will be available for cross-examination at the hearing in this matter. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Emmanuel Staurulakis (Witness)**

RESPONSE:

1(a): No specific studies were developed by or on behalf of the RLECs to demonstrate the increase in line losses associated with local rate increases. Rather, Mr. Staurulakis reached his conclusion regarding acceleration of access line loss based on industry comment to proposals referenced in the FCC's Notice of Proposed Rulemaking dated February 9, 2011. In comments filed by State Members of the Universal Service Joint Board on May 2, 2011 in response to the FCC's Public Notice, the following comments are made on page 117:

"State Members found that the multi-proposal combination of reducing intrastate access to interstate, eliminating corporate operations expense and reducing HCL percentages would be particularly significant. Among NECA companies, a significant share of carriers in 32 States would have to raise rates by at least $20.00 per month, and in 15 States some rate increases would be at least $50 per month. Debt ratios among NECA companies would degrade to the point that most companies would experience difficulty in raising capital. Among mid-sized companies the effects are not as thoroughly analyzed, but they would appear to be of a similar nature, with significant decreases in current revenues likely to lead to rate increases, impairment of access to capital, or both."

1(b): See response to 1(a), above.

1(c): See response to 1(a), above.

SPRINT

REQUEST NO. 2: Please refer to Mr. Staurulakis's discussion of access line losses and their impact of potential KYUSF disbursements on pages 8-9 of his Direct Testimony. Does Mr. Staurulakis assert the RLECs' intrastate switched access revenues have not been declining year over year?

OBJECTION: Mr. Staurulakis's testimony speaks for itself, and he will be available for cross-examination at the hearing in this matter. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Emmanuel Staurulakis (Witness)**

RESPONSE: No specific trending analysis of the Kentucky RLEC intrastate switched access revenues was undertaken by Mr. Staurulakis in preparation for the filing of direct testimony.

SPRINT

REQUEST NO. 3: Referring to Mr. Staurulakis's discussion of carrier of last resort obligations (COLR) on page 9, lines 3-6 of his Direct Testimony:

a. Do any of the RLECs track the cost of being a Carrier of Last Resort (COLR) in Kentucky?

b. If so, what was the cost of COLR by year, by RLEC, for the last three calendar years (2008, 2009 and 2010)?

c. If so, please provide a description of how this cost is identified and the individual cost components included in the calculation.

OBJECTION: Mr. Staurulakis's testimony speaks for itself, and he will be available for cross-examination at the hearing in this matter. Without waiving this objection, Peoples Rural states as follows.

RESPONDENT: **Emmanuel Staurulakis (Witness)**

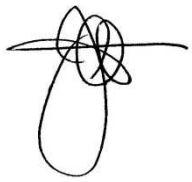
RESPONSE:

3(a) The RLECs are not aware of any proceeding initiated by the Kentucky Commission to calculate the cost of being a COLR in Kentucky. Accordingly, the RLECs do not perform any specific type of cost analysis associated with their COLR obligations in Kentucky.

3(b) See response to 3(a), above.

3(c) See response to 3(a), above.

Respectfully submitted,



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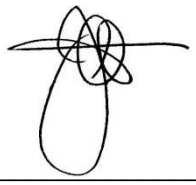
VERIFICATION PAGE TO FOLLOW

CERTIFICATE OF SERVICE

In accordance with Ordering Paragraph No. 5 of the Commission's March 10, 2011 Order, this is to certify that this September 2, 2011 electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on September 2, 2011; that an original and one copy of the filing will be delivered to the Commission on September 2, 2011; and that, on September 2, 2011, electronic mail notification of the electronic filing will be provided through the Commission's electronic filing system.



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