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

Adm. Case No. 2010-00398

Supplemental Response of tw telecom of Kentucky, llc to AT&T's 5/2/11 Data Request #25

tw telecom of kentucky, llc ("TWTC") hereby submits this supplemental response to data request #25 propounded 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.

The attorneys of record for TWTC, rather than the listed witness, are responsible for the objection stated herein.

Respectfully submitted

/s/ Katherine K. Yunker

Katherine K Yunker <u>yunker@desuetude.com</u> Oran S. McFarlan, III

omcfarlan@desuetude.com YUNKER & PARK PLC P.O. Box 21784

Lexington, KY 40522-1784 Phone: 859-255-0629

Fax: 859-255-0746

Attorneys for tw telecom of kentucky, llc

Case No. 2010-00398 AT&T 5/2/11 Req. #25 Public TWTC 6/17/11 Amended Response page 1 of 1

Request:

25. 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.

Response: OBJECTION. This request is overly broad and unduly burdensome, particularly because it seeks information that is of dubious relevance to this investigation. It is also insufficiently precise as to either the revenues or volumes requested.

Without waiver of the objection, see Attachment 1.

Note: TWTC's records go back to 2007 in Kentucky.

Witness: Carolyn Ridley

Case No. 2010-00398 AT&T 5/2/11 Req. #25 Public TWTC 6/17/11 Amended Response Attachment 1 Page 1 of 1

	Jan - May 2011		2010		2009		2008		2007	
Service	Revenue	<u>Volume</u>	Revenue	<u>Volume</u>	Revenue	<u>Volume</u>	Revenue	<u>Volume</u>	Revenue	<u>Volume</u>
Line and Trunk Features										
Listings/Non-List/Non-Pub										
Telephone Numbers	hone Numbers - redacted-	icted-	— redacted—		— redacted—		— redacted—		— redacted—	
VoiceMail										