

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of An Investigation into the        )  
Intrastate Switched Access Rates of All        ) Administrative Case No.  
Kentucky Incumbent and Competitive        ) 2010-00398  
Local Exchange Carriers                        )

---

**RESPONSES OF CINCINNATI BELL TELEPHONE COMPANY LLC  
TO AT&T'S FIRST DATA REQUESTS TO INCUMBENT AND RURAL LOCAL  
EXCHANGE CARRIERS (PUBLIC VERSION)**

---

Pursuant to the Procedural Schedule contained in Appendix A to the Commission's March 10, 2011 Order, Cincinnati Bell Telephone Company LLC ("CBT") hereby responds to AT&T's First Set of Data Requests to Incumbent and Rural Local Exchange Carriers.

**GENERAL OBJECTIONS**

CBT objects to all data requests submitted to it on the grounds that it has adopted the price regulation plan set forth in KRS 278.543 effective July 12, 2007 and, therefore, its intrastate access charges were deemed to be just and reasonable under KRS 278.030 upon election and CBT is exempt from the ratemaking procedures in KRS 278.190, KRS 278.260 and KRS 289.270. Therefore, the Commission is without jurisdiction to change CBT's intrastate access rates. Notwithstanding its objections, CBT hereby responds to the data requests solely for informational purposes and reserves all rights to object to any effort to change any of its rates through this proceeding.

CBT further objects to the Instructions, Definitions and Data Requests, as overly broad and unduly burdensome, vague, beyond the scope of this proceeding, requiring burdensome data compilation and detailed research and analysis, and calling for information belonging to non-

parties to this proceeding. In addition, the Data Requests call for the disclosure of information which is confidential, proprietary and competitively sensitive to CBT and which constitutes trade secrets and cannot be shared except in strict accordance with an appropriate protective agreement acceptable to CBT to preclude its disclosure or improper use by a competitor.

These general objections are incorporated within the response to each individual data request. Notwithstanding these objections, CBT responds to the Data Requests as follows:

### **DATA REQUESTS**

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:

**RESPONSE:** CBT objects to the time scope of this Data Request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. CBT's mechanized customer records system does not contain data prior to 2006 and, thus, does not permit reasonable, economical, or timely calculation of the requested data from 2001 through 2005. Notwithstanding its objections, CBT hereby provides year end data for 2006 through 2010 and 2011 data through end of April.

- (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).

**RESPONSE:**

<u>Year</u>	<u>Quantity</u>
2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (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).

**RESPONSE:**

<u>Year</u>	<u>Quantity</u>
2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (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.

**RESPONSE:**

<u>Year</u>	<u>Quantity</u>
2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (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).

**RESPONSE:**

<u>Year</u>	<u>Quantity</u>
2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

**RESPONSE:** None.

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.

**RESPONSE:** CBT objects to this Data Request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. CBT’s mechanized customer records system does not contain data prior to 2006 and, thus, does not permit reasonable, economical, or timely calculation of the requested data from 2001 through 2005. In addition, the term “average monthly revenue per line” is vague and ambiguous and not defined, therefore CBT does not know what information AT&T is seeking. Notwithstanding its objections, CBT hereby provides year end data for 2006 through 2010 and 2011 data through end of April for access line counts and May for revenue data. Data is not available disaggregated by standalone and non-basic as requested by AT&T, but only on a total residential and total business line basis.

Year	Residential Access Lines	Total KY Residential Local Service Revenue	Average Per Line Per Month
2006	redacted	\$ redacted	\$ redacted
2007	redacted	\$ redacted	\$ redacted
2008	redacted	\$ redacted	\$ redacted
2009	redacted	\$ redacted	\$ redacted
2010	redacted	\$ redacted	\$ redacted
2011	redacted	\$ redacted	N/A

Year	Business Access Lines	Total KY Business Local Service Revenue	Average Per Line Per Month
2006	redacted	\$ redacted	\$ redacted
2007	redacted	\$ redacted	\$ redacted
2008	redacted	\$ redacted	\$ redacted
2009	redacted	\$ redacted	\$ redacted
2010	redacted	\$ redacted	\$ redacted
2011	redacted	\$ redacted	N/A

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:

**RESPONSE:** CBT objects to this Data Request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. CBT's mechanized customer records system does not contain data prior to 2006 and, thus, does not permit reasonable, economical, or timely calculation of the requested data from 2001 through 2005. Notwithstanding its objections, CBT hereby provides year end data for 2006 through 2010 and 2011 data through end of April.

- (a) Residential standalone basic local exchange service (as defined in KRS 278.541)

**RESPONSE:**

2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (b) Business standalone basic local exchange service (as defined in KRS 278.541)

**RESPONSE:**

2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (c) Residential non-basic local exchange service access lines, including voice grade equivalent lines for ISDN BRI.

**RESPONSE:**

2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (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).

**RESPONSE:**

2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

- (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

**RESPONSE:**

2006	redacted
2007	redacted
2008	redacted
2009	redacted
2010	redacted
2011	redacted

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.

**RESPONSE:** CBT objects to this request as vague and ambiguous because “average local rate per line” is not defined. Notwithstanding its objections, CBT hereby provides year end data for 2010 and 2011 data through end of April. Calculations of the average retail price for standalone basic local exchange service as identified in Data Request 1(a) and 1(b) are shown below. CBT cannot calculate a meaningful average local rate per line for parts (c) and (d) because non-standalone access lines are sold in bundles with other services and features and the billing and bundling credits for these lines is not allocated between the various services and features. There are no lines in category (e).

Residence	Price	EOY 2010		April 2011	
		Quantity	Revenue	Quantity	Revenue

Band 1	Standard Price	16.95	redacted	redacted	redacted	redacted	redacted
	Lifeline	9.95	redacted	redacted	redacted	redacted	redacted
	Vacation						
	Service	8.48	redacted	redacted	redacted	redacted	redacted
Band 3	Concession	10.17	redacted	redacted	redacted	redacted	redacted
	Standard Price	18.95	redacted	redacted	redacted	redacted	redacted
	Lifeline	10.95	redacted	redacted	redacted	redacted	redacted
	Vacation						
Band 4	Service	9.48	redacted	redacted	redacted	redacted	redacted
	Concession	11.37	redacted	redacted	redacted	redacted	redacted
	Standard Price	24.00	redacted	redacted	redacted	redacted	redacted
	Lifeline	17.00	redacted	redacted	redacted	redacted	redacted
Band 4	Vacation						
	Service	12.00	redacted	redacted	redacted	redacted	redacted
	Concession	14.40	redacted	redacted	redacted	redacted	redacted
	Standard Price	12.40	redacted	redacted	redacted	redacted	redacted
Band 4 LAS	Lifeline	5.40	redacted	redacted	redacted	redacted	redacted
	Vacation						
	Service	6.20	redacted	redacted	redacted	redacted	redacted
	Concession	7.44	redacted	redacted	redacted	redacted	redacted
Total			redacted	redacted	redacted	redacted	redacted
Average Price					redacted		redacted

**Business**

Band 1	Standard Price	46.25	redacted	redacted		redacted	redacted
	Govt/Ed		redacted	redacted			redacted
	Service	37.00				redacted	
Band 3	Standard Price	49.75	redacted	redacted		redacted	redacted
	Govt/Ed		redacted	redacted			redacted
	Service	39.80				redacted	
Band 4	Standard Price	55.00	redacted	redacted		redacted	redacted
	Govt/Ed		redacted	redacted			redacted
	Service	44.00				redacted	
Band 4 LAS	Standard Price	23.75	redacted	redacted		redacted	redacted
	Govt/Ed		redacted	redacted			redacted
	Service	19.00				redacted	
Total			redacted	redacted		redacted	redacted
Average Price					redacted		redacted

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.

**RESPONSE:** (a)

Year	Resale Rate	Quantity	Revenue	Weighted Average
2006	\$11.23	redacted	\$ redacted	\$ redacted
	\$12.61	redacted	\$ redacted	
	\$17.50	redacted	\$ redacted	
		redacted	\$ redacted	
2007	\$6.38	redacted	\$ redacted	\$ redacted
	\$11.23	redacted	\$ redacted	
	\$12.61	redacted	\$ redacted	
	\$17.50	redacted	\$ redacted	
2008	\$6.38	redacted	\$ redacted	\$ redacted
	\$11.23	redacted	\$ redacted	
	\$12.61	redacted	\$ redacted	
	\$17.50	redacted	\$ redacted	
2011	\$16.12	redacted	\$ redacted	\$ redacted

(b)

Year	Resale Rate	Quantity	Revenue	Weighted Average
2006	\$16.46	redacted	redacted	\$ redacted
	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$38.12	redacted	redacted	
		redacted	redacted	
2007	\$16.46	redacted	redacted	\$ redacted
	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$38.12	redacted	redacted	
		redacted	redacted	



2008	\$16.46	redacted	redacted	redacted	redacted
	\$32.06	redacted	redacted	redacted	
	\$34.49	redacted	redacted	redacted	
	\$38.12	redacted	redacted	redacted	
2009	\$16.46	redacted	redacted	redacted	redacted
	\$32.06	redacted	redacted	redacted	
	\$34.49	redacted	redacted	redacted	
	\$38.12	redacted	redacted	redacted	
2010	\$16.46	redacted	redacted	redacted	redacted
	\$32.06	redacted	redacted	redacted	
	\$34.49	redacted	redacted	redacted	
	\$38.12	redacted	redacted	redacted	
2011	\$16.46	redacted	redacted	redacted	redacted
	\$32.06	redacted	redacted	redacted	
	\$34.49	redacted	redacted	redacted	
	\$38.12	redacted	redacted	redacted	

(c)

Year	Resale Rate	Quantity	Revenue	Weighted Average
2006	\$ 6.38	redacted	redacted	redacted
	\$11.23	redacted	redacted	
	\$12.61	redacted	redacted	
	\$17.50	redacted	redacted	
2007	\$11.23	redacted	redacted	redacted
	\$12.61	redacted	redacted	
	\$12.65	redacted	redacted	
	\$17.50	redacted	redacted	
2008	\$11.23	redacted	redacted	redacted
	\$12.61	redacted	redacted	
	\$12.65	redacted	redacted	
	\$17.50	redacted	redacted	
2009	\$16.12	redacted	redacted	

		redacted	redacted	redacted
2010	\$7.77	redacted	redacted	
	\$11.27	redacted	redacted	
	\$16.12	redacted	redacted	
2011	\$6.38	redacted	redacted	redacted
		redacted	redacted	redacted

(d)

Year	Resale Rate	Quantity	Revenue	Weighted Average
2006	\$32.06	redacted	redacted	redacted
2007	\$32.06	redacted	redacted	redacted
2008	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$48.49	redacted	redacted	redacted
2009	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$48.49	redacted	redacted	redacted
2010	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$38.12	redacted	redacted	
	\$58.24	redacted	redacted	redacted
2011	\$32.06	redacted	redacted	
	\$34.49	redacted	redacted	
	\$38.12	redacted	redacted	
	\$48.49	redacted	redacted	redacted

(e) None.

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);

Year	High Cost Fund	Low Income Fund
2010	\$794,243	\$275,398
Through March 2011	\$198,114	\$ 63,040

- b) All payments into the Federal Universal Service Fund(s);

2010	\$ redacted
Through May 2011	\$ redacted

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.

**RESPONSE:** CBT does not track this information.

- (b) Volume of intrastate, interMTA minutes terminated by you on behalf of wireless carriers, and dollars billed for such intrastate, interMTA minutes.

**RESPONSE:** CBT does not track this information.

- (c) Volume of local minutes terminated by you and dollars billed for wireless traffic as reciprocal compensation for such traffic;

Year	MOUs	Revenue
2010	redacted	\$ redacted
Through March 2011	redacted	\$ redacted

- (d) Volume of local minutes terminated by you and dollars billed for non-wireless traffic as reciprocal compensation for such traffic;

Year	MOUs	Revenue
2010	redacted	\$ redacted
Through March 2011	redacted	\$ redacted

8. What rate(s) do you charge for termination of intraMTA wireless calls? Provide the source showing the basis for each such rate(s).

**RESPONSE:** Pursuant to interconnection agreements on file with the Commission, CBT charges \$0.0007 per minute for termination of wireless calls.

9. What rate(s) do you charge for termination of VoIP calls originated by VoIP providers?

**RESPONSE:** CBT has no direct VoIP interconnections and, therefore, does not know whether a call originates as VoIP. CBT charges interstate access, intrastate access or reciprocal compensation rates, depending upon the originating number.

10. How many Lifeline access lines were provided by you for 2010 and for 2011 most recent data available?

<b>RESPONSE:</b> Jan 2010	2,821
Feb 2010	2,828
Mar 2010	2,833
Apr 2010	2,833
May 2010	2,829
Jun 2010	2,778
Jul 2010	2,765
Aug 2010	2,743
Sep 2010	2,112
Oct 2010	2,175
Nov 2010	2,235
Dec 2010	2,265
Jan 2011	2,289
Feb 2011	2,288
Mar 2011	2,307

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 nonILEC affiliates.

**RESPONSE:** CBT objects to the scope of this Data Request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, it is overly burdensome for CBT to separately identify and group revenues by type of provider. Notwithstanding its

objections, CBT provides a chart showing the rate elements billed, units and total revenue by year from 2001 through March 2011.

- (a) Total *intrastate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;

	<b>2001</b>	
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
CELLULAR	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

	<b>2002</b>	
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
CELLULAR	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

	<b>2003</b>	
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
CELLULAR	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

	<b>2004</b>	
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted

TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2005**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2006**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2007**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2008**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2009**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted

TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted
<b>2010</b>		
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted
<b>2011</b>		
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

- (b) Total *intrastate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;

<b>2001</b>		
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted
<b>2002</b>		
<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted

LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2003**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2004**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2005**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2006**

<b><u>Rate Element</u></b>	<b><u>Units</u></b>	<b><u>Revenue</u></b>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted



INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2007**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2008**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2009**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2010**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted

CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2011**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
CCL	redacted	redacted
INFO SUR	redacted	redacted
LOC SW 2	redacted	redacted
RIC	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

- (c) Total *interstate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;

**2001**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2002**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2003**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2004**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2005**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2006**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2007**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2008**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
INTER-P CMN MUX CHRG	redacted	redacted
INTER-P CMN TRK PRT CHRG	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2009**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2010**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted

CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2011**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

- (d) Total *interstate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;

**2001**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2002**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2003**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2004**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
---------------------	--------------	----------------

800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2005**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2006**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2007**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2008**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2009**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
---------------------	--------------	----------------

800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2010**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

**2011**

<u>Rate Element</u>	<u>Units</u>	<u>Revenue</u>
800 QUERY	redacted	redacted
CMN MUX	redacted	redacted
CMN TRK PRT	redacted	redacted
LOC SW 1	redacted	redacted
LOC SW 2	redacted	redacted
TDM	redacted	redacted
TS TRAN/MMOU	redacted	redacted
TS TRAN/MOU	redacted	redacted

- (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.

**RESPONSE:** All requested information is contained in the responses to parts (a) through (d) above. All elements are billed in MOUs, except 800 Query service, which is billed by message.

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.

**RESPONSE:** CBT objects to this Data Request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. CBT has not paid access charges in Kentucky. CBT's affiliates are not parties to this proceeding and do not maintain this information in a reasonably retrievable form.

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".)

**RESPONSE:** CBT has no such estimate and it would be overly burdensome to require CBT to prepare such an estimate for this proceeding.

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.

**RESPONSE:** For access traffic that lacks sufficient information to identify the jurisdiction, CBT applies a PIU ("percent interstate usage") factor as described in CBT's access tariffs to determine what portion is billed at interstate and intrastate rates.

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.

**RESPONSE:** CBT has no such estimate and it would be overly burdensome to require CBT to prepare such an estimate for this proceeding.

16. Have you, your parent companies and/or affiliates filed any appeals of FCC Orders that established your interstate switched access rates?

**RESPONSE:** 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)?

**RESPONSE:** 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.

**RESPONSE:** The network functionality to originate and terminate interstate and intrastate switched access traffic is not materially different, but because the origination and termination points are jurisdictionally different, the cost to originate and terminate interstate and intrastate traffic is different due to separations. For interstate toll traffic, the federally assigned portion of carrier common line costs is recovered through the federal subscriber line charge, whereas for intrastate toll traffic, the state assigned portion of carrier common line costs are recovered through carrier switched access charges.

- (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.

**RESPONSE:** The network functionality to terminate interstate and intrastate switched access traffic is not materially different from the functionality used to terminate local calls, except that such calls are received over separate trunk groups. However, intrastate switched access



charges are designed to recover the intrastate portion of local loop costs, whereas, for purposes of reciprocal compensation CBT is not permitted to include any loop costs.

- (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.

**RESPONSE:** CBT does not receive any VoIP calls directly from originating carriers. All VoIP originated calls are received by CBT indirectly through other carriers using TDM protocol, either as switched access traffic or as local calls. See responses (a) and (b) above.

- (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

**RESPONSE:** The network functionality to terminate interstate and intrastate switched access traffic is not materially different from the functionality used to terminate wireless calls, except that such calls are received over separate trunk groups.

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;

**RESPONSE:** Ohio and Indiana.

- (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;

**RESPONSE:** PUCO Case No. 96-899-TP-ALT.

- (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.

**RESPONSE:** No.

- (d) If the answer to (c) indicates “Yes,” what was the result of the related appeal or challenge?

**RESPONSE:** N/A.

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.

**RESPONSE:** Yes, but conditionally. See CC Docket No. 01-92, Reply Comments of Cincinnati Bell Inc., filed Jul 20 2005; Ex Parte Letter of Cincinnati Bell Inc., filed October 3, 2008; Reply Comments of Cincinnati Bell Inc., filed May 23, 2011.

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.

**RESPONSE:** CBT provides toll service in Kentucky only for those few of its local service customers in the Butler, Falmouth, Glencoe, Warsaw and Williamstown exchanges who still have grandfathered Local Area Service. CBT’s affiliate, Cincinnati Bell Any Distance Inc. provides both intrastate and interstate toll service in Kentucky.

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

**RESPONSE:** CBT objects to this request as overly broad and burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. CBT has no readily available means of separately reporting Kentucky toll service MOUs and revenues. CBT further objects to this Data Request insofar as it requests data from affiliates that are not parties to this proceeding.

23. Do you have any elasticity studies for local or toll services? If so, please produce copies of those.

**RESPONSE:** 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.

**RESPONSE:** CBT objects to this Data Request as overly broad and burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In addition, vertical services are not regulated or within the jurisdiction of the Commission and are beyond the scope of this proceeding. CBT further objects to this Data Request as vague and ambiguous because the term “retail vertical services” is not defined and CBT cannot reasonably determine what services AT&T intended it to cover. CBT cannot reasonably determine the revenues for retail vertical services because such services are sold in combination with other services and the billings and credits are not allocated between the various services. Service bundles also render counts of vertical services impossible, as many bundles provide customers with access to multiple custom calling services but CBT has no record of whether a customer activates or uses a particular feature.

25. Provide a schedule reflecting your local rates for residential and business customers by rate group from 1985 to the present.

**RESPONSE:** CBT objects to this request as overly broad and burdensome, beyond the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, CBT’s local service rates from 1985 through January 24, 1999 are shown on the historical tariff pages from CBT’s Exchange Rate Tariff, PSCK No. 1 shown in the file titled “CBT Access Line Rate Schedule 1985 to 1999.pdf.” CBT’s local service rates from January 25, 1999 forward are shown on the historical tariff pages from CBT’s Exchange Rate Tariff, PSCK No. 2 shown in the file titled “CBT Access Line Rate Schedule 1999 to 2011.pdf.”