

**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 VERIZON'S
FIRST SET OF DATA REQUESTS (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 Verizon's First Set of Data Requests to Cincinnati Bell Telephone Company.

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 data requests as calling for the disclosure of confidential and proprietary business information belonging to CBT and which qualifies as a trade secret. CBT will provide this information subject to the terms of a protective agreement acceptable to CBT.

RESPONSES TO DATA REQUESTS

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.

RESPONSE: CBT's Kentucky intrastate switched access rates last changed on January 25, 1999, pursuant to Case 98-292.

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.

RESPONSE: CBT's switched Kentucky intrastate switched access rate elements can be found at:

http://www.psc.state.ky.us/Home/Library?type=Tariffs&folder=Telecommunications/Telecommunications_A-C/Cincinnati%20Bell%20Telephone/Cincinnati%20Bell%20-%20Access%20Services

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

RESPONSE: CBT's switched Kentucky intrastate switched access rates can be found at:

http://www.psc.state.ky.us/Home/Library?type=Tariffs&folder=Telecommunications/Telecommunications_A-C/Cincinnati%20Bell%20Telephone/Cincinnati%20Bell%20-%20Access%20Services

CBT's interstate switched access rates can be found in its FCC No. 35 tariff, available at the FCC website at:

http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ccb/etfs/webpublic/browse.hts?IdTariff=92&IdLec=16&User_Type=2&IdLec_User=&id_user=

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

RESPONSE: FCC No. 35
Kentucky Access Tariff PSCK No. 2

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.

RESPONSE: Yes. See CBT’s Kentucky Access Tariff PSCK No. 2, referenced above. The applicable rate elements are Carrier Common Line Service-Originating and Carrier Common Line Service-Terminating, which are billed on a per minute of use basis.

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.

RESPONSE: 2008 redacted %
2009 redacted %
2010 redacted %

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.

RESPONSE:

2008 redacted %
2009 redacted %
2010 redacted %

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.

RESPONSE:

	Intrastate Access	Interstate Access
2008	redacted %	redacted %
2009	redacted %	redacted %
2010	redacted %	redacted %

9. Please identify what percentage of your total revenues for each of 2008, 2009 and 2010 were derived from the federal universal service fund.

RESPONSE:

2008	redacted %
2009	redacted %
2010	redacted %

10. Please identify the rate(s) you charge for basic local exchange service, as that term is defined by KRS 278.541(1).

RESPONSE: See Cincinnati Bell Telephone Company LLC Exchange Rate Tariff, PSCK No. 2, Section 2, 4th Revised Page 1, 4th Revised Page 2, 5th Revised Page 3, and 7th Revised page 4.

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.

RESPONSE:

2008:	redacted
2009:	redacted
2010:	redacted