

**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 SECOND SET OF DATA REQUESTS FROM TWTC, LEVEL 3 AND PAETEC
(PUBLIC VERSION)**

Pursuant to the Procedural Schedule contained in Appendix A to the Commission's March 10, 2011 Order, as amended by the Order dated August 29, 2011, Cincinnati Bell Telephone Company LLC ("CBT") hereby responds to twtc, Level 3 and PAETEC's Second Set of Data Requests to Incumbent 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.

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. 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.

RESPONSE: 2009 \$ Redacted
2010 \$ Redacted

2. Provide the number of your terminating interstate and intrastate access minutes for 2009 and for 2010 (separately).

RESPONSE:

| | Interstate | Intrastate |
|------|------------|------------|
| 2009 | Redacted | Redacted |
| 2010 | Redacted | Redacted |

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.

RESPONSE: CBT objects to this Data Request as vague, overly broad and burdensome, beyond the scope of this proceeding, not reasonably calculated to lead to the discovery of admissible evidence. Interstate access revenues are not at issue in this proceeding. Without waiving its objections, CBT responds on the assumption that all terminating switched access elements would be replaced by a single reciprocal compensation rate element.

| | Interstate | Intrastate |
|------|-------------|-------------|
| 2009 | \$ Redacted | \$ Redacted |
| 2010 | \$ Redacted | \$ Redacted |

4. Provide the number of your reciprocal compensation minutes for 2009 and 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.

RESPONSE:

| | |
|------|----------|
| 2009 | Redacted |
| 2010 | Redacted |

5. Produce all workpapers, calculations, and formulas – native format, including spreadsheets (Excel preferred) – for the revenue shift numbers stated in requests #1 and #3 above.

RESPONSE: The revenue shift calculations are simple arithmetic, multiplying the demand quantity by the applicable rate differences and totaling the resulting quantities. It is unnecessary to provide a native file (which cannot be filed with the Commission) to demonstrate the calculation, which is shown in the following charts:

#1

2009

| Rate Element | Quantity | Kentucky Rate | Interstate Rate | Rate Difference | Revenue Shift |
|-----------------------|----------|---------------|-----------------|-----------------|---------------|
| Common Trunk Port | Redacted | \$0.000978 | \$0.000968 | \$0.000010 | Redacted |
| Carrier Common Line | Redacted | \$0.032793 | | \$0.032793 | Redacted |
| Information Surcharge | Redacted | \$0.02600 | | \$0.02600 | Redacted |
| Local Switching | Redacted | \$0.005405 | \$0.003863 | \$0.001542 | Redacted |
| Local Trunking | Redacted | \$0.000102 | \$0.000117 | (\$0.000015) | Redacted |
| Tandem | Redacted | \$0.002845 | \$0.002001 | \$0.000844 | Redacted |
| Total | | | | | Redacted |

2010

| Rate Element | Quantity | Kentucky Rate | Interstate Rate | Rate Difference | Revenue Shift |
|-----------------------|----------|---------------|-----------------|-----------------|---------------|
| Common Trunk Port | Redacted | \$0.000978 | \$0.000968 | \$ 0.000010 | Redacted |
| Carrier Common Line | Redacted | \$0.032793 | | \$ 0.032793 | Redacted |
| Information Surcharge | Redacted | \$0.026600 | | \$ 0.026600 | Redacted |
| Local Switching | Redacted | \$0.005404 | \$0.003863 | \$ 0.001542 | Redacted |
| Local Trunking | Redacted | \$0.000102 | \$0.000117 | \$(0.000015) | Redacted |
| Tandem | Redacted | \$0.002845 | \$0.002001 | \$ 0.000844 | Redacted |
| Total | | | | | Redacted |

#3

Interstate:

2009

| Rate Element | Quantity | Interstate Rate | Interconnection Rate | Rate Difference | Revenue Shift |
|---------------------|-----------------|------------------------|-----------------------------|------------------------|----------------------|
| Common Multiplexing | | | | | Redacted |
| Common Trunk Port | | | | | Redacted |
| Local Switching | Redacted | \$0.003671 | \$0.00070 | \$0.002971 | Redacted |
| Local Trunking | | | | | Redacted |
| Tandem | | | | | Redacted |
| Termination | | | | | Redacted |
| LNP Query | | | | | Redacted |
| Total: | | | | | Redacted |

2010

| Rate Element | Quantity | Interstate Rate | Interconnection Rate | Rate Difference | Revenue Shift |
|---------------------|-----------------|------------------------|-----------------------------|------------------------|----------------------|
| Common Multiplexing | | | | | Redacted |
| Common Trunk Port | | | | | Redacted |
| Local Switching | Redacted | \$0.003671 | \$0.00070 | \$0.002971 | Redacted |
| Local Trunking | | | | | Redacted |
| Tandem | | | | | Redacted |
| Termination | | | | | Redacted |
| LNP Query | | | | | Redacted |
| Total: | | | | | Redacted |

Intrastate

2009

| Rate Element | Quantity | Interstate Rate | Interconnection Rate | Rate Difference | Revenue Shift |
|--------------------------|-----------------|------------------------|-----------------------------|------------------------|----------------------|
| Common Multiplexing | | | | | Redacted |
| Common Trunk Port Charge | | | | | Redacted |
| Carrier Common Line | | | | | Redacted |
| Information Surcharge | | | | | Redacted |
| Local Switching | Redacted | \$0.005404 | \$0.00070 | \$0.004704 | Redacted |
| Local Trunking | | | | | Redacted |
| Tandem | | | | | Redacted |
| Termination | | | | | Redacted |
| Total: | | | | | Redacted |

2010

| Rate Element | Quantity | Interstate Rate | Interconnection Rate | Rate Difference | Revenue Shift |
|--------------------------|-----------------|------------------------|-----------------------------|------------------------|----------------------|
| Common Multiplexing | | | | | Redacted |
| Common Trunk Port Charge | | | | | Redacted |
| Carrier Common Line | | | | | Redacted |
| Information Surcharge | | | | | Redacted |
| Local Switching | Redacted | \$0.005404 | \$0.00070 | \$0.004704 | Redacted |
| Local Trunking | | | | | Redacted |
| Tandem | | | | | Redacted |
| Termination | | | | | Redacted |
| Total: | | | | | Redacted |