

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

**In the Matter of:**

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

**WINDSTREAM KENTUCKY EAST, LLC AND WINDSTREAM KENTUCKY WEST,  
LLC'S DATA REQUEST TO SE ACQUISITIONS, LLC d/b/a SOUTHEAST  
TELEPHONE**

Without waiving and upon express reservation of all of their rights as alternatively regulated carriers statutorily exempt from this proceeding, Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”) submit the following Data Request to SE Acquisitions, LLC d/b/a SouthEast Telephone to be answered in accord with the following:

**DEFINITIONS**

- “Windstream East” means Windstream Kentucky East, LLC f/k/a Windstream Kentucky East, Inc., and “Windstream West” means Windstream Kentucky West, LLC f/k/a Windstream Kentucky West, Inc.
- “You” and “your” refer to the SE Acquisitions, LLC d/b/a SouthEast Telephone. As used herein, the terms “you” and “your” are intended to reflect all territories in which the aforementioned legal entities maintain operations.
- “Affiliate” as defined in Section 3 of the Communications Act of 1934, as amended (“the Act”) means “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of

more than 10 percent.” (47 U.S.C. §153(1).) As used herein, unless otherwise stated, the term “affiliate” is intended to reflect only the Kentucky operations of your affiliates.

- “Document” shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in your full or partial possession, custody or control, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original.
- “Referring” or “relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- “And” and “or” as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction shall serve to bring within the scope of this discovery request any information that would otherwise not be brought within their scope.
- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by this discovery request, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:

- a. the type of document (*e.g.*, letter, memorandum, etc.);
  - b. the date of the document;
  - c. the title or label of the document;
  - d. the identity of the document originator;
  - e. the identity of each person to whom the document was sent;
  - f. a summary of the contents of the document; and
  - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

### **GENERAL INSTRUCTIONS**

This discovery request is to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. This discovery request is intended to include requests for information, which is physically within your possession, custody or control.

To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

If this request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

This request is continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to this request subsequently become known.

For each request, provide the name of your witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

## DATA REQUEST

1. Please provide the amount of annual “access revenue shift they would experience if their intrastate switched access rates mirror their interstate switched access rate” as such phrase is used in Appendix A of the Kentucky Public Service Commission’s March 10, 2011 order in this docket.

Respectfully submitted,

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### Certification

I hereby certify that the electronic version of this filing made with the Commission this - 2<sup>nd</sup> day of May, 2011 is a true and accurate copy of the documents filed herewith in paper form, and the electronic version of the filing has been transmitted to the Commission.