

BEFORE THE COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSES AND OBJECTIONS TO AT&T’S FIRST DATA REQUESTS TO WINDSTREAM KENTUCKY WEST, LLC, WINDSTREAM KENTUCKY EAST, LLC

REDACTED VERSION

Windstream Kentucky East, LLC (“Windstream East”) and Windstream Kentucky West, LLC (“Windstream West”) submit the following responses and objections to the First Data Requests served by BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky and AT&T Communications of the South Central States, LLC (collectively, “AT&T”):

OBJECTIONS APPLICABLE TO ALL AT&T FIRST DATA REQUESTS

The following objections apply to each data request and the accompanying directions and instructions served by AT&T:

1. Windstream East and Windstream West object that they are alternatively regulated local exchange carriers who are statutorily exempt from this proceeding. Their submission of these Responses is without waiver of and with express reservation of all of their rights as alternatively regulated carriers.
2. Windstream East and Windstream west object to the First Data Requests to the extent that the seek information about any activities conducted by Windstream East and Windstream

West, including but not limited to the selling of particular services or bundles of services, that are outside of the Commission's jurisdiction.

3. Windstream East and Windstream West object to the First Data Requests to the extent they may be construed as calling for the disclosure of information subject to a claim of privilege or immunities including the attorney-client privilege, the attorney work product doctrine, the joint-defense privilege, or any other applicable evidentiary privilege or immunity from disclosure. The inadvertent disclosure of any information subject to such privileges or immunities is not intended to relinquish any privilege or immunity and shall not be deemed to constitute a waiver of any applicable privilege or immunity.
4. Windstream East and Windstream West object to any data request to the extent that it seeks to impose the request on parents or affiliates of Windstream East and Windstream West who are not parties to this proceeding.
5. Windstream East and Windstream West generally object to the requests to the extent that they: (a) are overly broad; (b) are impermissibly vague and ambiguous and fail to describe with reasonable particularity the information sought; (c) seek production of information that is not relevant to the subject matter at issue in this action and/or are not reasonably calculated to lead to the discovery of admissible evidence; (d) not readily maintained in the ordinary course in the form requested; and (e) impose undue burdens that outweigh any probative value the information may have in this action.
6. Windstream East and Windstream West object to the requests to the extent they seek information (*e.g.*, tariff or commission proceeding information) that is in the public domain, is available from other, more convenient sources, and/or is accessible by, if not already in the possession of, AT&T.

7. Windstream East and Windstream West object to the requests to the extent they purport to impose a burden of ascertaining information that is not in their possession, custody, control, or personal knowledge, or that cannot be found in the course of a reasonable search.
8. Windstream East and Windstream West object to the requests to the extent they purport to impose upon them obligations greater than or different from those authorized by the Rules of Civil Procedure - including those imposing a reasonable limitation on the amount of discovery that may be served on a party, particularly when considering voluminous discovery conducted in the by AT&T reflected in the incorporated record in this proceeding. As provided under the Rules, each party may propound a maximum of thirty (30) interrogatories and thirty (30) requests for admission, and the Rules expressly provide that each subpart of an interrogatory or request shall be counted as a separate interrogatory or request. Windstream East and Windstream West should not be harmed by excessive discovery which is in addition to the harm they already are suffering from the violation of their rights as alternatively regulated carriers.
9. Windstream East and Windstream West object to the requests to the extent that they seek information that is more than five years old as such information is no longer relevant.

RESPONSES

Windstream East and Windstream West do not waive and fully preserve all of the foregoing objections, which are incorporated fully herein. Any information provided herein is made on the basis of the best information available to Windstream East and/or Windstream West at the time of gathering responsive materials or information, within the limits of, and subject to the general and specific objections set forth herein. Windstream East and Windstream West have

attempted to locate responsive information through an investigation of sources from which such information might reasonably be expected to be found, but by means of responses and objections to the Requests for Information or in subsequent testimony or other filings, Windstream East and Windstream West reserve the right to supplement or modify their responses and objections if additional information becomes available.

The fact that Windstream East and Windstream West are willing to provide responsive information to any particular request does not constitute an admission or acknowledgment that the request is proper, that the information sought is within the proper bounds of discovery, or that other requests for similar information will be similarly treated. Further, any and all responses provided herein are for the purpose of the above-captioned case only and are not responses for any other purpose. Similarly, they may not be used against Windstream East or Windstream West in any other proceeding unless specifically agreed to by them or so ordered by a court or commission of competent jurisdiction.

Windstream East and Windstream West reserve the right to rely on facts, documents, or other evidence, which may develop or subsequently come to its attention, to assert additional objections or supplemental responses should it discover that there is information or grounds for objections and to supplement or amend these Responses at any time.

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:

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

RESPONSES:

i. Windstream East objects to this data request as overly burdensome to the extent that it seeks information that Windstream East does not ordinarily track, such as certain differentiations between types of access lines served, as well as to the extent that it seeks information that AT&T has already sought and been provided.

Without waiving these objections, to the extent that this data request seeks information from years prior to 2009, Windstream East directs AT&T to its response to AT&T Data Request No. 1 in the incorporated record in this proceeding. With regard to the years 2009 and 2010 (as of December 31 of the relevant year), Windstream East responds as follows:

- Windstream East Single Line Residential lines in service 2009 - [REDACTED]
- Windstream East Single Line Business lines in service 2009 - [REDACTED]
- Windstream East Multi-line Business lines in service 2009 - [REDACTED]
- Windstream East Other revenue producing access lines 2009 - [REDACTED]
- Windstream East Single Line Residential lines in service 2010 - [REDACTED]
- Windstream East Single Line Business lines in service 2010 - [REDACTED]
- Windstream East Multi-line Business lines in service 2010 - [REDACTED]
- Windstream East Other revenue producing access lines 2010 - [REDACTED]

ii. Windstream West objects to this data request as overly burdensome to the extent that it seeks information that Windstream West does not ordinarily track, such as certain differentiations between types of access lines served, as well as to the extent that it seeks information that AT&T has already sought and been provided.

Without waiving these objections, to the extent that this data request seeks information from years prior to 2009, Windstream West directs AT&T to its response to AT&T Data Request No. 1 in the incorporated record in this proceeding. With regard to the years 2009 and 2010 (as of December 31 of the relevant year), Windstream West responds as follows:

- Windstream West Single Line Residential lines in service 2009 - [REDACTED]
- Windstream West Single Line Business lines in service 2009 - [REDACTED]
- Windstream West Multi-line Business lines in service 2009 - [REDACTED]
- Windstream West Other revenue producing access lines 2009 - [REDACTED]
- Windstream West Single Line Residential lines in service 2010 - [REDACTED]
- Windstream West Single Line Business lines in service 2010 - [REDACTED]
- Windstream West Multi-line Business lines in service 2010 - [REDACTED]
- Windstream West Other revenue producing access lines 2010 - [REDACTED]

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

i. Windstream East objects to this data request because the term “revenue” is vague and ambiguous, most likely referring to operations outside of the Commission’s jurisdiction.

ii. Windstream West objects to this data request because the term “revenue” is vague and ambiguous, most likely referring to operations outside of the Commission’s jurisdiction.

Windstream East / Windstream West Respondent: prepared by counsel

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:

- a) Residential standalone basic local exchange service (as defined in KRS 278.541)
- b) Business standalone basic local exchange service (as defined in KRS 278.541)
- c) Residential non-basic local exchange service access lines, including voice grade equivalent lines for ISDN BRI.
- 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).
- e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

RESPONSES:

i. Windstream East objects to this data request as overly burdensome to the extent that it seeks information that no longer readily available to Windstream East, and, depending on age, irrelevant. Windstream East also objects to this data request to the extent that Windstream East does not track the retail purposes for which its wholesale customers use Windstream East's service. Further, Windstream East objects to this data request to the extent that it seeks irrelevant information regarding access lines for which the wholesale carrier, not Windstream, assess and receives any intrastate switched access charges. Without waiving these objections, Windstream East responds as follows:

Residential lines sold to CLECs pursuant to 47 U.S.C. § 251(c)(4):

- As of December 31, 2003: [REDACTED]
- As of December 31, 2004: [REDACTED]
- As of December 31, 2005: [REDACTED]
- As of December 31, 2006: [REDACTED]
- As of December 31, 2007: [REDACTED]
- As of December 31, 2008: [REDACTED]
- As of December 31, 2009: [REDACTED]
- As of December 31, 2010: [REDACTED]
- As of April 30, 2011: [REDACTED]

Business lines sold to CLECs pursuant to 47 U.S.C. § 251(c)(4):

- As of December 31, 2003: [REDACTED]
- As of December 31, 2004: [REDACTED]
- As of December 31, 2005: [REDACTED]

As of December 31, 2006: [REDACTED]
As of December 31, 2007: [REDACTED]
As of December 31, 2008: [REDACTED]
As of December 31, 2009: [REDACTED]
As of December 31, 2010: [REDACTED]
As of April 30, 2011: [REDACTED]

ii. Windstream West objects to this data request as overly burdensome to the extent that it seeks information that no longer readily available to Windstream West, and, depending on age, irrelevant. Windstream East also objects to this data request to the extent that Windstream West does not track the retail purposes for which its wholesale customers use Windstream West's service. Further, Windstream East objects to this data request to the extent that it seeks irrelevant information regarding access lines for which the wholesale carrier, not Windstream, assess and receives any intrastate switched access charges. Without waiving these objections, Windstream West responds as follows:

Residential lines sold to CLECs pursuant to 47 U.S.C. § 251(c)(4):

As of December 31, 2003: [REDACTED]
As of December 31, 2004: [REDACTED]
As of December 31, 2005: [REDACTED]
As of December 31, 2006: [REDACTED]
As of December 31, 2007: [REDACTED]
As of December 31, 2008: [REDACTED]
As of December 31, 2009: [REDACTED]
As of December 31, 2010: [REDACTED]

Business lines sold to CLECs pursuant to 47 U.S.C. § 251(c)(4):

As of December 31, 2003: [REDACTED]
As of December 31, 2004: [REDACTED]
As of December 31, 2005: [REDACTED]
As of December 31, 2006: [REDACTED]
As of December 31, 2007: [REDACTED]
As of December 31, 2008: [REDACTED]
As of December 31, 2009: [REDACTED]
As of December 31, 2010: [REDACTED]
As of April 30, 2011: [REDACTED]

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

i. Windstream East does not routinely maintain such information in such form and therefore has no information to provide.

ii. Windstream West does not routinely maintain such information in such form and therefore has no information to provide.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

i. Windstream East incorporates its objections to AT&T Data Request No. 3 and further states that it does not routinely maintain such information in such form and therefore has no information to provide.

ii. Windstream West incorporates its objections to AT&T Data Request No. 3 and further states that it does not routinely maintain such information in such form and therefore has no information to provide.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

a)

i.

Windstream East 2010

High-Cost Loop: \$23,808
High-Cost Model: \$3,531,243
Interstate Access Support: \$6,079,377
Interstate Common Line Support: \$0
Local Switching Support: \$0
Safety Net Additive: \$0
Safety Valve Support: \$0

Windstream East 2011 (Through April)

High-Cost Loop: \$44,652
High-Cost Model: \$1,220,852
Interstate Access Support: \$2,052,070
Interstate Common Line Support: \$0
Local Switching Support: \$0
Safety Net Additive: \$0
Safety Valve Support: \$0

ii.

Windstream West 2010

High-Cost Loop: \$0
High-Cost Model: \$0
Interstate Access Support: \$0
Interstate Common Line Support: \$379,818
Local Switching Support: \$281,232
Safety Net Additive: \$1,902,096
Safety Valve Support: \$0

Windstream West 2011 (Through April)

High-Cost Loop: \$0
High-Cost Model: \$0
Interstate Access Support: \$0
Interstate Common Line Support: \$60,121
Local Switching Support: \$74,276
Safety Net Additive: \$718,040

Safety Valve Support: \$0

- b)
 - i. Windstream East responds as follows:
 - 2010: \$4,241,544
 - 2011 (through May 31, 2011): \$1,851,103
 - ii. Windstream West responds as follows:
 - 2010: \$166,972
 - 2011 (through May 31, 2011): \$74,186

Windstream East / Windstream West Respondent: Cesar Caballero

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.
 - b) Volume of intrastate, interMTA minutes terminated by you on behalf of wireless carriers, and dollars billed for such intrastate, interMTA minutes.
 - c) Volume of local minutes terminated by you and dollars billed for wireless traffic as reciprocal compensation for such traffic;
 - d) Volume of local minutes terminated by you and dollars billed for non-wireless traffic as reciprocal compensation for such traffic;

RESPONSES:

a,b)

- i. Windstream East does not maintain such information because it bills minutes on blended rates and factors, as described in pertinent interconnection agreements on public file with the Commission.
- ii. Windstream East does not maintain such information because it bills minutes on blended rates and factors, as described in pertinent interconnection agreements on public file with the Commission.

c,d)

- i. Windstream East objects to these subparts of this data request because they seek information unrelated to the subject of this proceeding.
- ii. Windstream East objects to these subparts of this data request because they seek information unrelated to the subject of this proceeding.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

i. The rates that Windstream East charges for termination of intraMTA wireless calls can be found in their interconnection agreements which are on file with the Commission.

ii. The rates that Windstream West charges for termination of intraMTA wireless calls can be found in their interconnection agreements which are on file with the Commission.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

i. Windstream East does not differentiate between VoIP calls originated by VoIP providers and any other type of call in determining applicable intercarrier compensation rates. Such applicable intercarrier compensation rates are available in publicly-filed tariffs and interconnection agreements.

iii. Windstream West does not differentiate between VoIP calls originated by VoIP providers and any other type of call in determining applicable intercarrier compensation rates. Such applicable intercarrier compensation rates are available in publicly-filed tariffs and interconnection agreements.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

- i. Windstream East:
 - As of December 31, 2010: 11,510
 - As of April 30, 2011: 12,080

- ii. Windstream West:
 - As of December 31, 2010: 226
 - As of April 30, 2011: 248

Windstream East / Windstream West Respondent: Cesar Caballero

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 non-ILEC affiliates.

- a) Total intrastate, terminating switched access revenues billed including non-traffic sensitive revenues) and MOUs;
- b) Total intrastate, originating switched access revenues billed including non-traffic sensitive revenues) and MOUs;
- c) Total interstate, terminating switched access revenues billed including non-traffic sensitive revenues) and MOUs;
- d) Total interstate, originating switched access revenues billed including non-traffic sensitive revenues) and MOUs;
- 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.

RESPONSES:

i. Windstream East objects to this data request to the extent that it requires them to format their response in any particular manner. It is not Windstream East's obligation to format data for AT&T's convenience, so long as data are presented in an understandable manner. Windstream East also object to this data request to the extent that it seeks a division of revenues and MOUs by carrier type that it does not maintain, such as each division requested herein. Without waiving these objections, Windstream East provides the following information:

- a) With regard to years prior to 2009, Windstream East directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding. With regard to 2009, 2010, and 2011 (to date), Windstream provides the following information ("NA" denotes information that is not available in the form or for the time period specified):

Carrier Common Line Service

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Indirect InterMTA Rate

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Information Surcharge Prem Terminating

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Transport - Tandem Switched Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination - Term

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination-Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Transport

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]

Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switching - Terminating

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Tandem Switched Transport - Term

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Transit Traffic

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Unbundled Prem Local Switching Term

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

WRLS Direct InterMTA Rate

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Windstream East also billed the following intrastate switched access rate elements on a flat-rated basis, as described in its tariffs:

Entrance Facility DS1

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Entrance Facility DS3 Electrical

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Entrance Facility - DS1, First System

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Entrance Facility 2W Voice Grade

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Entrance Facility DS3, First 1/4 Mile

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

b) With regard to years prior to 2009, Windstream East directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding. With regard to 2009, 2010, and 2011 (to date), Windstream provides the following information (“NA” denotes information that is not available in the form or for the time period specified):

800/877/888 Database Query Basic

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Cellular Reverse Toll- Tandem Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

End Office Switching Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Information Surcharge Prem Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Switching - Originating

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Transport - Tandem Switched Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Facility Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination-Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switching Originating

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Tandem Switched Transport - Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Tandem Switched Transport-Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]

Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

c,d) Windstream objects to these subparts of this data request because they seek information regarding services that are outside of the Commission's jurisdiction.

e) Please see Exhibit AT&T #11. **(Redacted in its entirety).**

ii. Windstream West objects to this data request to the extent that it requires them to format their response in any particular manner. It is not Windstream West's obligation to format data for AT&T's convenience, so long as data are presented in an understandable manner. Windstream West also object to this data request to the extent that it seeks a division of revenues and MOUs by carrier type that it does not maintain, such as each division requested herein. Without waiving these objections, Windstream West provides the following information:

a) With regard to years prior to 2009, Windstream West directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding. With regard to 2009, 2010, and 2011 (to date), Windstream provides the following information ("NA" denotes information that is not available in the form or for the time period specified):

CCL Premium Terminating

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Indirect InterMTA Rate

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Information Surcharge Prem Terminating

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Loc Trans Residual Interconnection Charge

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Transport - Tandem Switched Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination - Term

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Transport

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Unbundled Prem Local Switching Term

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

WRLS Direct InterMTA Rate

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Windstream West also billed the following intrastate switched access rate elements on a flat-rated basis, as described in its tariffs:

LT Entrance Facility - DS1, First System

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

b) With regard to years prior to 2009, Windstream West directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding. With regard to 2009, 2010, and 2011 (to date), Windstream provides the following information (“NA” denotes information that is not available in the form or for the time period specified):

800/877/888 Database Query Basic

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

CCL Premium Terminating 700

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

CCL Premium Terminating 800

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

CCL Premium Terminating 900

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]

Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Information Surcharge Prem Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Switching - Originating

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Local Transport - Tandem Switched Termination

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Interconnection Rate Orig Prem

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Facility Orig

Total Units for the year ending December 31, 2009 - [REDACTED]
Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

LT Tandem Switched Termination

Total Units for the year ending December 31, 2009 - [REDACTED]

Total Units for the year ending December 31, 2010 - [REDACTED]
Total Units for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Tandem Switched Transport - Orig

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

Tandem Switched Transport-Termination

Total MOUs for the year ending December 31, 2009 - [REDACTED]
Total MOUs for the year ending December 31, 2010 - [REDACTED]
Total MOUs for the year 2011 through April 30 - [REDACTED]
Total revenue for the year ending December 31, 2009 - [REDACTED]
Total revenue for the year ending December 31, 2010 - [REDACTED]
Total revenue for the year 2011 through April 30 - [REDACTED]

c,d) Windstream objects to these subparts of this data request because they seek information regarding services that are outside of the Commission's jurisdiction.

e) Please see Exhibit AT&T #11.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

a)

i. Windstream East objects to this data request to the extent that it seeks information regarding entities that are not parties to this proceeding. Without waiving this objection, Windstream East directs AT&T to the incorporated record in this proceeding.

ii. Windstream West objects to this data request to the extent that it seeks information regarding entities that are not parties to this proceeding. Without waiving this objection, Windstream West directs AT&T to the incorporated record in this proceeding.

b)

i. Windstream East objects to this subpart of this data request because it seeks information outside the jurisdiction of the Commission. Without waiving this objection, Windstream East states that it makes no intrastate switched access payments to any other carrier and has no related MOUs.

ii. Windstream West objects to this subpart of this data request because it seeks information outside the jurisdiction of the Commission. Without waiving this objection, Windstream West states that it makes no intrastate switched access payments to any other carrier and has no related MOUs.

c)

i. Please see Windstream East's response to subparts (a) and (b) of this data request.

ii. Please see Windstream East's response to subparts (a) and (b) of this data request.

Windstream East / Windstream West Respondent: Cesar Caballero

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”.)

RESPONSES:

- i. Windstream East operates only in Kentucky and states further that it does not have such an estimate, but considers any amount of mischaracterized traffic to be unreasonable.
- ii. Windstream West operates only in Kentucky and states further that it does not have such an estimate, but considers any amount of mischaracterized traffic to be unreasonable.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

- i. Windstream East directs AT&T to Section 4.3.3(F)(1) (Page 89) of its Tariff Ky. P.S.C. No. 8 and Section 6.5.5(H)(5) (Page 96.1) of its Tariff Ky. P.S.C. No. 9.
- ii. Windstream West directs AT&T to Section 2.3.11(C)(1) (Page 2-17.1) of its Tariff Ky. P.S.C. No. 5.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

i. Windstream East does not have such an estimate, but considers any amount of mischaracterized traffic to be unreasonable.

ii. Windstream West does not have such an estimate, but considers any amount of mischaracterized traffic to be unreasonable.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

i. Windstream East's interstate switched access rates are not an issue in this proceeding, and any appeals of any orders would be a matter of public record.

ii. Windstream West's interstate switched access rates are not an issue in this proceeding, and any appeals of any orders would be a matter of public record.

Windstream East / Windstream West Respondent: prepared by counsel

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)?

RESPONSES:

i. Windstream East objects to this data request because it seeks publicly-available information. Without waiving this objection, Windstream East directs AT&T its response to AT&T Data Request No. 10 in the incorporated record in this proceeding.

ii. Windstream West objects to this data request because it seeks publicly-available information. Without waiving this objection, Windstream West directs AT&T its response to AT&T Data Request No. 10 in the incorporated record in this proceeding.

Windstream East / Windstream West Respondent: Cesar Caballero

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.
 - 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.
 - 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.
 - 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.

RESPONSES:

- a)
 - i. Windstream East directs AT&T to its response to AT&T Data Request No. 10 in the incorporated record in this proceeding.
 - ii. Windstream West directs AT&T to its response to AT&T Data Request No. 10 in the incorporated record in this proceeding.
- b)
 - i. Windstream East states that the functionality that it uses to provide terminating switched access services, either for interstate or intrastate toll calls, generally does not materially differ from the functionality that it uses to provide local call termination for which either the FCC adopted reciprocal compensation charge or local interconnection charge applies.
 - ii. Windstream West states that the functionality that it uses to provide terminating switched access services, either for interstate or intrastate toll calls, generally does not materially differ from the functionality that it uses to provide local call termination for

which either the FCC adopted reciprocal compensation charge or local interconnection charge applies.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

a-d)

i. Windstream East objects to this data request because it seeks information outside the Commission’s jurisdiction. Windstream East also objects to this data request because AT&T is fully capable of discerning such information through examination of statutes, regulations, publicly-filed tariffs, and other publicly-filed documents. Further, AT&T, as a national interexchange carrier, is routinely a participant in, or at least an interested observer of, state-by-state developments regarding intrastate switched access charge rate regulation.

ii. Windstream West objects to this data request because it seeks information outside the Commission’s jurisdiction. Windstream West also objects to this data request because AT&T is fully capable of discerning such information through examination of statutes, regulations, publicly-filed tariffs, and other publicly-filed documents. Further, AT&T, as a national interexchange carrier, is routinely a participant in, or at least an interested observer of, state-by-state developments regarding intrastate switched access charge rate regulation.

Windstream East / Windstream West Respondent: prepared by counsel

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.

RESPONSES:

i. Windstream East directs AT&T to its prior discovery responses in the incorporated record in this proceeding and states. Windstream states again that all such filings are publicly available. Windstream East objects to this data request to the extent that it requires them to provide citations to such documents because AT&T monitors such advocacy and is fully capable of locating Windstream East's filings.

ii. Windstream West directs AT&T to its prior discovery responses in the incorporated record in this proceeding and states. Windstream states again that all such filings are publicly available. Windstream West objects to this data request to the extent that it requires them to provide citations to such documents because AT&T monitors such advocacy and is fully capable of locating Windstream West's filings.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

i. Windstream East is an intrastate toll service provider but not an interstate toll service provider in Kentucky. To the extent that this data request concerns affiliates of Windstream East that are not parties to this proceeding, Windstream East objects to this data request.

ii. Windstream West is not an intrastate or interstate toll service provider in Kentucky. Regarding Windstream West's affiliate Windstream East, please see Windstream East's response to subpart i of this data request. To the extent that this data request concerns affiliates of Windstream West that are not parties to this proceeding, Windstream West objects to this data request.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

a,b)

- i. Windstream East directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding.
- ii. Windstream West directs AT&T to its response to AT&T Data Request No. 15 in the incorporated record in this proceeding.

Windstream East / Windstream West Respondent: Cesar Caballero

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

RESPONSES:

i. Windstream East objects to this data request to the extent that it seeks information regarding services outside the Commission's jurisdiction. Without waiving this objection, Windstream East does not have any elasticity studies for local or toll services.

ii. Windstream East objects to this data request to the extent that it seeks information regarding services outside the Commission's jurisdiction. Without waiving this objection, Windstream West does not have any elasticity studies for local or toll services.

Windstream East / Windstream West Respondent: Cesar Caballero

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.

RESPONSES:

i. Windstream East objects to this data request because it seeks information regarding nonbasic services outside of the Commission's jurisdiction.

ii. Windstream West objects to this data request because it seeks information regarding nonbasic services outside of the Commission's jurisdiction.

Windstream East / Windstream West Respondent: Cesar Caballero

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

i. Windstream East objects to this data request as overly-broad because it seeks information that is up to 26 years old, is irrelevant, and would be overly burdensome to produce, particularly because Windstream East has not operated the Kentucky assets for the entire period. Windstream East also objects to this data request to the extent that it seeks information regarding services outside the the Commission's jurisdiction. Further, Windstream East objects to this data request to the extent that it seeks information that is publicly available in the Commission's public tariff records.

i. Windstream West objects to this data request as overly-broad because it seeks information that is up to 26 years old, is irrelevant, and would be overly burdensome to produce. Windstream West also objects to this data request to the extent that it seeks information regarding services outside the the Commission's jurisdiction. Further, Windstream West objects to this data request to the extent that it seeks information that is publicly available in the Commission's public tariff records.

Windstream East / Windstream West Respondent: prepared by counsel

26. For Windstream: Please verify that all discovery responses and documents that Windstream provided in Docket No. 2007-00503 remain accurate, true and correct. If there is any response or information that is no longer accurate, true and correct, please identify that and provide updated responses and information.

RESPONSES:

i. Without waiving the objections stated therein, Windstream East has verified that its responses to AT&T's data requests in the incorporated record in this proceeding, remain accurate, true, and correct.

ii. Without waiving the objections stated therein, Windstream West has verified that its responses to AT&T's data requests in the incorporated record in this proceeding, remain accurate, true, and correct.

Windstream East / Windstream West Respondent: Cesar Caballero

Respectfully submitted,

s/Robert C. Moore
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