

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)	

**FURTHER TESTIMONY
OF
CESAR CABALLERO**

**ON BEHALF OF WINDSTREAM KENTUCKY EAST, LLC AND
WINDSTREAM KENTUCKY WEST, LLC**

Dated July 8, 2011

1 reduction of their intrastate switched access rates or those of any carrier alternatively
2 regulated under KRS 278.543. I submit this further testimony with the full reservation of
3 rights as set forth previously in Windstream East and Windstream West's December 20,
4 2010 and April 15, 2011 Comments as well as throughout the record herein.

5 **Q. How does your Initial Testimony relate to the matters on which the Commission**
6 **now seeks comment?**

7 A. My Initial Testimony concerned attempts by certain interexchange carriers ("IXCs") to
8 cause the Commission to order targeted reductions in Windstream East and Windstream
9 West's intrastate switched access rates. Setting aside serious jurisdictional deficiencies,
10 such requests were particularly unreasonable and myopic as they: (1) selectively
11 prosecuted Windstream East and Windstream West without regard to any other carrier in
12 the Commonwealth and without regard to their status as alternatively regulated carriers;
13 (2) sought a result that would provide for no transition period; and (3) provided no
14 reasonable means for Windstream to recover displaced intrastate switched access
15 revenues assuming the Commission even had jurisdiction to order the requested
16 reductions. My Initial Testimony discussed those matters, as well as the general
17 reasonableness of Windstream's intrastate switched access rates, particular considerations
18 relating to the same, as well as general intercarrier compensation and universal service
19 policy issues.

20 **Q. Is your Initial Testimony still relevant?**

21 A. Certainly so. In fact, the Commission has incorporated such testimony into the record
22 currently before it. For convenience, my Initial Testimony is attached hereto as Exhibits
23 A and B.

1 **Q. Do you have anything to update from your Initial Testimony?**

2 A. Since the time that I filed my Initial Testimony, the Commission has sought comment on
3 intrastate switched access charge matters in this case on two separate occasions –
4 December 20, 2010 and April 15, 2011. Such comments continue to be relevant. I
5 incorporate by reference Windstream East and Windstream West’s December 20, 2010
6 and April 15, 2011 comments in this Case as part of this Further Testimony. Such
7 documents are attached hereto as Exhibits C and D.

8 **Q. Has anything changed since Windstream East and Windstream West filed their**
9 **April 15, 2011 comments in this Case?**

10 A. Parties have since conducted an initial round of discovery. No information that
11 Windstream has provided or received or any other information publicly-filed in this Case
12 changes positions that Windstream East and Windstream West have previously taken and
13 continue to take as described herein.

14 **Q. Does this conclude your Further Testimony?**

15 A. Yes, at this time.