

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Investigation into the Intrastate Switched  
Access Rates of All Kentucky Incumbent and  
Competitive Local Exchange Carriers

Adm. Case No. 2010-00398

**Data Requests to ILECs by  
TWTC, Level 3, and PAETEC**

tw telecom of kentucky, llc (“TWTC”), Level 3 Communications, LLC (“Level 3”), and US LEC of Tennessee L.L.C. d/b/a PAETEC Business Services (“PAETEC”), in accordance with the procedural schedule (Appendix A) set in the 3/10/11 Order in this proceeding, hereby jointly submit the attached data requests to be answered by each ILEC party to this proceeding.

Among the ILECs, Windstream West, Windstream East, and the RLECs submitted their respective amounts of Access Revenue Shift with petitions requesting confidential treatment therefor. Undersigned counsel have contacted the Windstream and RLEC counsel to ask for a proposed confidentiality agreement by which representatives of TWTC, Level 3, and PAETEC may review the submitted information; however, to date, no such agreement has been proposed and these intervenor-CLECs have not been provided the information. (Cincinnati Bell Telephone Company LLC is correct that “[a]ll participants in this proceeding should have access to the data (subject to a reasonable protective order as necessary) in order to independently test assertions that more revenue is necessary.” 4/15/11 Comments p.3.) TWTC, Level 3, and PAETEC therefore reserve their right to supplement these data requests once the information submitted with a request for confidential treatment has been disclosed to them.

Respectfully submitted by an attorney of record  
on behalf of TWTC, Level 3, and PAETEC

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## Data Requests

Each of the following requests is to be answered by each ILEC party to Kentucky PSC Adm. Case No. 2010-00398. Reference to “you,” “your,” or “your company” is to each such ILEC. The requests are for Kentucky-wide information and data; if Kentucky data or information cannot be provided for a particular response, then the geographical scope of that response must be expressly stated.

1. State your switched access minutes, by month, for the past five years.
2. Provide your average interstate and intrastate switched access charges per minute, by month for the past five years.
3. For 2010, what was your company’s total intrastate switched access revenue, by rate element, from all recurring switched access rate elements billed (including switched dedicated elements that are priced on a flat-rate basis)?
4. For each rate element identified in Request #3 above, provide the intrastate billed demand for each rate element for 2010.
5. Identify any differences in rate structure between your interstate and intrastate switched access tariffs.
6. Provide a comparison of your interstate and intrastate switched access rates by rate element for 2009 and 2010.
7. Provide a year-end income statement and balance sheet for your company for the past five years.
8. Provide the return on equity and return on rate base — total company and Kentucky intrastate only — for each year for the past five years.
9. State the number of access lines subscribing to stand-alone basic local service (that is, without any additional optional features or services, including DSL) at year end, for each of the past five years.
10. Does your company or an affiliate provide DSL? If the answer is yes, provide:
  - a. The number of residential and business lines that subscribe to DSL service;
  - b. The average monthly price for DSL for 2011; and
  - c. If an affiliate provides DSL, how the ILEC company is compensated (including structure and level) for the use of the local loop to provide DSL.

11. What is the monthly recurring price (at year-end 2010) and number of units sold (during calendar year 2010) for each bundle or package that includes basic local service?
12. State the current level of basic local service and the corresponding interstate SLC, assuming no additional features are purchased by the customer.
13. Provide your average revenue per residential and switched access line for each of the past five years, including all revenues for optional retail services in the numerator. Identify all additional features and services for which revenues were collected in each year.
14. With respect to the access revenue shift estimate and numbers you filed with the Commission on or about April 15, 2011, provide all workpapers for each such estimate or number, including spreadsheets, calculations, and input data.