

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

**Response of US LEC of Tennessee L.L.C.
d/b/a PAETEC Business Services to AT&T's 5/2/11 Data Requests**

US LEC of Tennessee L.L.C. d/b/a PAETEC Business Services (“US LEC” or “PAETEC”), hereby submits this response to the data requests propounded by BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky, AT&T Communications of the South Central States, LLC, BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Services, and TCG Ohio (“collectively, “AT&T”) on May 2, 2011. In a joint motion with other intervenors, filed June 10, 2011, US LEC requested an extension of time up to and including Friday, June 24, 2011, to file its responses to 5/2/11 data requests.

The attorneys of record for US LEC, rather than any listed witness, are responsible for the objections stated herein. US LEC generally objects to the AT&T requests on the grounds that they are — as a whole — overly broad and unduly burdensome. For example:

- Many of the requests go beyond the scope of this proceeding in seeking information not relevant (or of dubious relevance) to the issues identified by the Commission, or data about other jurisdictions or related entities not parties to this proceeding.
- The requests seeking numerical data often do so for each month since January 2001 and ask for it to be categorized or at a level of detail not collected or kept by US LEC; nearly all such requests would require US LEC to perform an analysis or generate a particular number, rather than provide data it has. Many of these requests seek highly-sensitive, competitively-significant financial and operations data.

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- Some requests call for speculation, or are ambiguous, insufficiently precise, or ill-defined.
- Other requests appear to call for a narrative about matters of public record or which otherwise ask for information as easily compiled by AT&T as by US LEC.

Nonetheless, US LEC has attempted to gather and provide information that is responsive to the AT&T requests, often undertaking analysis, study, or computations it would not otherwise perform. In formulating a response, US LEC has applied common sense to its interpretation of the requests and to identify relevant information. It provides these responses without waiver of its general objections to the AT&T 5/2/11 Data Requests.

Respectfully submitted

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Request:

1. Do you offer standalone basic local exchange service as defined in KRS 278.541? If so, 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 anon-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 non-traditional 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 non-traditional 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.

Response:

All of the US LEC (d/b/a PAETEC) retail local exchange service access lines (which are all for business service) are included in the following year-end counts.

2005
2006
2007
2008
2009
2010

—redacted—

Request:

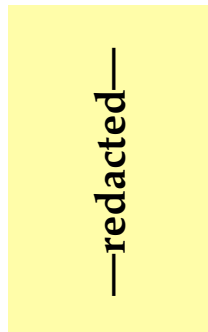
2. For each year from 2001 through 2010, and for 2011 most recent data available, please provide the average monthly revenue per line identified in Data Request 1(a), 1(b), 1(c), 1(d) and 1(e). If the average monthly revenue figures are not available in the format requested for each of these types of 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.

Response:

as to 1(a) and (c): Not Applicable.

as to 1(b) and (d), annual totals are:

2005
2006
2007
2008
2009
2010



as to 1(e): see response for 1(b) and (d)

Request:

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.

Response:

OBJECTION. This request is unduly burdensome, and would require that US LEC (d/b/a PAETEC) perform an analysis or generate a particular number, rather than provide data it has. US LEC has not elected alternative regulation or adopted a price regulation plan under KRS 278.541 – .543 for which its distinctions (*e.g.* basic vs. non-basic) is relevant. Furthermore, by definition “basic local exchange service” means a retail telecommunications service. *See* KRS 278.541(1).

Request:

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.

Response:

OBJECTION. This request is unduly burdensome, and would require that US LEC (d/b/a PAETEC) perform an analysis or generate a particular number, rather than provide data it has. US LEC has not elected alternative regulation or adopted a price regulation plan under KRS 278.541 – .543 for which its distinctions (*e.g.*, basic vs. non-basic) is relevant. In addition, the request is vague and imprecise as to what is “the calculated weighted average local rate per line per month” as to each retail type.

Request:

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.

Response:

OBJECTION. This request is unduly burdensome, and would require that US LEC (d/b/a PAETEC) perform an analysis or generate a particular number, rather than provide data it has. US LEC has not elected alternative regulation or adopted a price regulation plan under KRS 278.541 – .543 for which its distinctions (*e.g.* basic vs. non-basic) is relevant. Furthermore, by definition “basic local exchange service” means a retail telecommunications service. *See* KRS 278.541(1). In addition, (a) the request is vague and imprecise as to what is “the calculated weighted average local rate per line per month” as to each wholesale type and (b) AT&T does not specify and US LEC does not know to which ILEC AT&T refers or what “the greatest level of disaggregation the ILEC maintains in its historical revenue records” might be.

Request:

6. 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

Response:

Note: Currently the PAETEC CABS billing system cannot split jurisdictions by MTA.

If a wireless carrier sends traffic to terminate that should be billed to the wireless company, the system drops the call and puts it into error. Once development is complete to bill the MTA jurisdictions, the usage will bill according to MTA region.

Minutes and revenue billed data are provided on Attachments 1-5 to the response to Data Request #9.

Request:

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

Response:

Currently US LEC (d/b/a PAETEC) does not bill for wireless intraMTA calls. The usage is currently being held in an error bucket so that the usage is retained and can be billed once the development referenced in response to Data Request #6 is complete.

Request:

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

Response:

If a call is originated by a VoIP provider, the PAETEC system has no way to determine that the call was originally a VoIP call. These calls look the same as any other call going across the network, and so will be billed as passed to US LEC (d/b/a PAETEC) when completing the call. If a call is passed as interstate, intrastate, or local, it will be billed according to the jurisdiction indicated on the call as passed.

In addition, Section 1.2 of the PAETEC interstate tariff defines Access Service so that it “[i]ncludes all services and facilities provided by the Company for the origination or termination of any interstate or foreign telecommunications or other communications services that have the ability to reach the public switched telephone network regardless of the technology used in transmission. This includes, but is not limited to, local exchange, long distance, and data communications services that may use either TDM or Internet Protocol (‘IP’) or other technology.”

Request:

9. 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.

Response:

Data responsive to this request is provided on Attachments 1-5 hereto. Note: The split by rate component can be performed for the months from January 2010 through May 2011. *See* Attachment 5 hereto (with 4866 rows of data). From October 2007 through December 2009, summary-level monthly data is available by jurisdiction and direction; customer category level and detailed components are not available.

JUR	DIR		201001	201002	201003	201004	201005	201006
INTERSTATE	<u>ORIG</u>	BILLED MOU	—redacted—					
	<u>TERM</u>	BILLED MOU						
INTERSTATE BILLED								
INTERSTATE MOU								
INTRASTATE	<u>ORIG</u>	BILLED MOU						
	<u>TERM</u>	BILLED MOU						
INTRASTATE BILLED								
INTRASTATE MOU								
LOCAL	<u>TERM</u>	BILLED MOU						
LOCAL BILLED								
LOCAL MOU								
TOTAL BILLED								
TOTAL MOU								

JUR	DIR		201007	201008	201009	201010	201011	201012
INTERSTATE	<u>ORIG</u>	BILLED MOU	—redacted—					
	<u>TERM</u>	BILLED MOU						
INTERSTATE BILLED								
INTERSTATE MOU								
INTRASTATE	<u>ORIG</u>	BILLED MOU						
	<u>TERM</u>	BILLED MOU						
INTRASTATE BILLED								
INTRASTATE MOU								
LOCAL	<u>TERM</u>	BILLED MOU						
LOCAL BILLED								
LOCAL MOU								
TOTAL BILLED								
TOTAL MOU								

JUR	DIR		201101	201102	201103	201104	201105	Grand Total							
INTERSTATE	<u>ORIG</u>	BILLED	—redacted—												
		MOU													
	<u>TERM</u>	BILLED													
		MOU													
INTERSTATE BILLED															
INTERSTATE MOU															
INTRASTATE	<u>ORIG</u>	BILLED							—redacted—						
		MOU													
	<u>TERM</u>	BILLED													
		MOU													
INTRASTATE BILLED															
INTRASTATE MOU															
LOCAL	<u>TERM</u>	BILLED	—redacted—												
		MOU													
LOCAL BILLED															
LOCAL MOU															
TOTAL BILLED															
TOTAL MOU															

JUR	DIR		Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09
INTERSTATE	<u>ORIG</u>	BILLED	—redacted—					
	<u>TERM</u>	BILLED						
INTERSTATE BILLED								
INTERSTATE MOU								
INTRASTATE	<u>ORIG</u>	BILLED						
	<u>TERM</u>	BILLED						
INTRASTATE BILLED								
INTRASTATE MOU								
LOCAL	<u>TERM</u>	BILLED						
		MOU						
LOCAL BILLED								
LOCAL MOU								
TOTAL BILLED								
TOTAL MOU								

JUR	DIR		Jul-09	Aug-09	Sep-09	Oct-09	Dec-09	TOTAL
INTERSTATE	<u>ORIG</u>	BILLED	—redacted—					
		MOU						
	<u>TERM</u>	BILLED						
		MOU						
INTERSTATE BILLED								
INTERSTATE MOU								
INTRASTATE	<u>ORIG</u>	BILLED						
		MOU						
	<u>TERM</u>	BILLED						
		MOU						
INTRASTATE BILLED								
INTRASTATE MOU								
LOCAL	<u>TERM</u>	BILLED						
		MOU						
LOCAL BILLED								
LOCAL MOU								
TOTAL BILLED								
TOTAL MOU								

NOTE: Due to system integrations, Nov-09 bill was not rendered; Dec-09 bill captured usage from Nov.1.

TERM REVENUE

MO	JUR	DIR	KY
Oct-07	INTER	TERM	— redacted —
Nov-07	INTER	TERM	
Dec-07	INTER	TERM	
Jan-08	INTER	TERM	
Feb-08	INTER	TERM	
Mar-08	INTER	TERM	
Apr-08	INTER	TERM	
May-08	INTER	TERM	
Jun-08	INTER	TERM	
Jul-08	INTER	TERM	
Aug-08	INTER	TERM	
Sep-08	INTER	TERM	
Oct-08	INTER	TERM	
Nov-08	INTER	TERM	
Dec-08	INTER	TERM	

ORIG REVENUE

MO	JUR	DIR	KY
Oct-07	INTER	ORIG	— redacted —
Nov-07	INTER	ORIG	
Dec-07	INTER	ORIG	
Jan-08	INTER	ORIG	
Feb-08	INTER	ORIG	
Mar-08	INTER	ORIG	
Apr-08	INTER	ORIG	
May-08	INTER	ORIG	
Jun-08	INTER	ORIG	
Jul-08	INTER	ORIG	
Aug-08	INTER	ORIG	
Sep-08	INTER	ORIG	
Oct-08	INTER	ORIG	
Nov-08	INTER	ORIG	
Dec-08	INTER	ORIG	

MO	JUR	DIR	KY
Oct-07	INTRA	TERM	— redacted —
Nov-07	INTRA	TERM	
Dec-07	INTRA	TERM	
Jan-08	INTRA	TERM	
Feb-08	INTRA	TERM	
Mar-08	INTRA	TERM	
Apr-08	INTRA	TERM	
May-08	INTRA	TERM	
Jun-08	INTRA	TERM	
Jul-08	INTRA	TERM	
Aug-08	INTRA	TERM	
Sep-08	INTRA	TERM	
Oct-08	INTRA	TERM	
Nov-08	INTRA	TERM	
Dec-08	INTRA	TERM	

MO	JUR	DIR	KY
Oct-07	INTRA	ORIG	— redacted —
Nov-07	INTRA	ORIG	
Dec-07	INTRA	ORIG	
Jan-08	INTRA	ORIG	
Feb-08	INTRA	ORIG	
Mar-08	INTRA	ORIG	
Apr-08	INTRA	ORIG	
May-08	INTRA	ORIG	
Jun-08	INTRA	ORIG	
Jul-08	INTRA	ORIG	
Aug-08	INTRA	ORIG	
Sep-08	INTRA	ORIG	
Oct-08	INTRA	ORIG	
Nov-08	INTRA	ORIG	
Dec-08	INTRA	ORIG	

TERM MOU

MO	JUR	DIR	KY
Oct-07	INTER	TERM	— redacted —
Nov-07	INTER	TERM	
Dec-07	INTER	TERM	
Jan-08	INTER	TERM	
Feb-08	INTER	TERM	
Mar-08	INTER	TERM	
Apr-08	INTER	TERM	
May-08	INTER	TERM	
Jun-08	INTER	TERM	
Jul-08	INTER	TERM	
Aug-08	INTER	TERM	
Sep-08	INTER	TERM	
Oct-08	INTER	TERM	
Nov-08	INTER	TERM	
Dec-08	INTER	TERM	

ORIG MOU

MO	JUR	DIR	KY
Oct-07	INTER	ORIG	— redacted —
Nov-07	INTER	ORIG	
Dec-07	INTER	ORIG	
Jan-08	INTER	ORIG	
Feb-08	INTER	ORIG	
Mar-08	INTER	ORIG	
Apr-08	INTER	ORIG	
May-08	INTER	ORIG	
Jun-08	INTER	ORIG	
Jul-08	INTER	ORIG	
Aug-08	INTER	ORIG	
Sep-08	INTER	ORIG	
Oct-08	INTER	ORIG	
Nov-08	INTER	ORIG	
Dec-08	INTER	ORIG	

TERM MOU (cont'd)

MO	JUR	DIR	KY
Oct-07	INTRA	TERM	— redacted —
Nov-07	INTRA	TERM	
Dec-07	INTRA	TERM	
Jan-08	INTRA	TERM	
Feb-08	INTRA	TERM	
Mar-08	INTRA	TERM	
Apr-08	INTRA	TERM	
May-08	INTRA	TERM	
Jun-08	INTRA	TERM	
Jul-08	INTRA	TERM	
Aug-08	INTRA	TERM	
Sep-08	INTRA	TERM	
Oct-08	INTRA	TERM	
Nov-08	INTRA	TERM	
Dec-08	INTRA	TERM	

ORIG MOU (cont'd)

MO	JUR	DIR	KY
Oct-07	INTRA	ORIG	— redacted —
Nov-07	INTRA	ORIG	
Dec-07	INTRA	ORIG	
Jan-08	INTRA	ORIG	
Feb-08	INTRA	ORIG	
Mar-08	INTRA	ORIG	
Apr-08	INTRA	ORIG	
May-08	INTRA	ORIG	
Jun-08	INTRA	ORIG	
Jul-08	INTRA	ORIG	
Aug-08	INTRA	ORIG	
Sep-08	INTRA	ORIG	
Oct-08	INTRA	ORIG	
Nov-08	INTRA	ORIG	
Dec-08	INTRA	ORIG	

TERM ARPM

MO	JUR	DIR	KY
Oct-07	INTER	TERM	— redacted —
Nov-07	INTER	TERM	
Dec-07	INTER	TERM	
Jan-08	INTER	TERM	
Feb-08	INTER	TERM	
Mar-08	INTER	TERM	
Apr-08	INTER	TERM	
May-08	INTER	TERM	
Jun-08	INTER	TERM	
Jul-08	INTER	TERM	
Aug-08	INTER	TERM	
Sep-08	INTER	TERM	
Oct-08	INTER	TERM	
Nov-08	INTER	TERM	
Dec-08	INTER	TERM	

ORIG ARPM

MO	JUR	DIR	KY
Oct-07	INTER	ORIG	— redacted —
Nov-07	INTER	ORIG	
Dec-07	INTER	ORIG	
Jan-08	INTER	ORIG	
Feb-08	INTER	ORIG	
Mar-08	INTER	ORIG	
Apr-08	INTER	ORIG	
May-08	INTER	ORIG	
Jun-08	INTER	ORIG	
Jul-08	INTER	ORIG	
Aug-08	INTER	ORIG	
Sep-08	INTER	ORIG	
Oct-08	INTER	ORIG	
Nov-08	INTER	ORIG	
Dec-08	INTER	ORIG	

MO	JUR	DIR	KY
Oct-07	INTRA	TERM	— redacted —
Nov-07	INTRA	TERM	
Dec-07	INTRA	TERM	
Jan-08	INTRA	TERM	
Feb-08	INTRA	TERM	
Mar-08	INTRA	TERM	
Apr-08	INTRA	TERM	
May-08	INTRA	TERM	
Jun-08	INTRA	TERM	
Jul-08	INTRA	TERM	
Aug-08	INTRA	TERM	
Sep-08	INTRA	TERM	
Oct-08	INTRA	TERM	
Nov-08	INTRA	TERM	
Dec-08	INTRA	TERM	

MO	JUR	DIR	KY
Oct-07	INTRA	ORIG	— redacted —
Nov-07	INTRA	ORIG	
Dec-07	INTRA	ORIG	
Jan-08	INTRA	ORIG	
Feb-08	INTRA	ORIG	
Mar-08	INTRA	ORIG	
Apr-08	INTRA	ORIG	
May-08	INTRA	ORIG	
Jun-08	INTRA	ORIG	
Jul-08	INTRA	ORIG	
Aug-08	INTRA	ORIG	
Sep-08	INTRA	ORIG	
Oct-08	INTRA	ORIG	
Nov-08	INTRA	ORIG	
Dec-08	INTRA	ORIG	

TOTAL TERM REVENUE

Oct-07	TERM	— redacted —
Nov-07	TERM	
Dec-07	TERM	
Jan-08	TERM	
Feb-08	TERM	
Mar-08	TERM	
Apr-08	TERM	
May-08	TERM	
Jun-08	TERM	
Jul-08	TERM	
Aug-08	TERM	
Sep-08	TERM	
Oct-08	TERM	
Nov-08	TERM	
Dec-08	TERM	

TOTAL ORIG REVENUE

Oct-07	ORIG	— redacted —
Nov-07	ORIG	
Dec-07	ORIG	
Jan-08	ORIG	
Feb-08	ORIG	
Mar-08	ORIG	
Apr-08	ORIG	
May-08	ORIG	
Jun-08	ORIG	
Jul-08	ORIG	
Aug-08	ORIG	
Sep-08	ORIG	
Oct-08	ORIG	
Nov-08	ORIG	
Dec-08	ORIG	

TOTAL TERM MOU

Oct-07	TERM	— redacted —
Nov-07	TERM	
Dec-07	TERM	
Jan-08	TERM	
Feb-08	TERM	
Mar-08	TERM	
Apr-08	TERM	
May-08	TERM	
Jun-08	TERM	
Jul-08	TERM	
Aug-08	TERM	
Sep-08	TERM	
Oct-08	TERM	
Nov-08	TERM	
Dec-08	TERM	

TOTAL ORIG MOU

Oct-07	ORIG	— redacted —
Nov-07	ORIG	
Dec-07	ORIG	
Jan-08	ORIG	
Feb-08	ORIG	
Mar-08	ORIG	
Apr-08	ORIG	
May-08	ORIG	
Jun-08	ORIG	
Jul-08	ORIG	
Aug-08	ORIG	
Sep-08	ORIG	
Oct-08	ORIG	
Nov-08	ORIG	
Dec-08	ORIG	

TOTAL TERM RPM

Oct-07	TERM	— redacted —
Nov-07	TERM	
Dec-07	TERM	
Jan-08	TERM	
Feb-08	TERM	
Mar-08	TERM	
Apr-08	TERM	
May-08	TERM	
Jun-08	TERM	
Jul-08	TERM	
Aug-08	TERM	
Sep-08	TERM	
Oct-08	TERM	
Nov-08	TERM	
Dec-08	TERM	

TOTAL ORIG ARPM

Oct-07	ORIG	— redacted —
Nov-07	ORIG	
Dec-07	ORIG	
Jan-08	ORIG	
Feb-08	ORIG	
Mar-08	ORIG	
Apr-08	ORIG	
May-08	ORIG	
Jun-08	ORIG	
Jul-08	ORIG	
Aug-08	ORIG	
Sep-08	ORIG	
Oct-08	ORIG	
Nov-08	ORIG	
Dec-08	ORIG	

	A	B	C	D	E	F	G	H	I	J	K
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201001	201002	201003	201004	201005	201006
2	CLEC / ILEC	INTER	ORIG	LTS	BILLED						
3	CLEC / ILEC	INTER	ORIG		QTY MOU						
4	CLEC / ILEC	INTER	ORIG	QB-MSG	BILLED						
5	CLEC / ILEC	INTER	ORIG		MESSAGES						
6	CLEC / ILEC	INTER	ORIG	SWAS	BILLED						
7	CLEC / ILEC	INTER	ORIG		QTY MOU						
8	CLEC / ILEC	INTER	ORIG	SWAS-DC	BILLED						
9	CLEC / ILEC	INTER	ORIG		QTY MOU						
10	CLEC / ILEC	INTER	TERM	SWAS	BILLED						
11	CLEC / ILEC	INTER	TERM		QTY MOU						
12	CLEC / ILEC	INTER	TERM	SWAS-DC	BILLED						
13	CLEC / ILEC	INTER	TERM		QTY MOU						
14	CLEC / ILEC	INTRA	ORIG	LTF	BILLED						
15	CLEC / ILEC	INTRA	ORIG		QTY MOU						
16	CLEC / ILEC	INTRA	ORIG	LTT	BILLED						
17	CLEC / ILEC	INTRA	ORIG		QTY MOU						
18	CLEC / ILEC	INTRA	ORIG	NS	BILLED						
19	CLEC / ILEC	INTRA	ORIG		QTY MOU						
20	CLEC / ILEC	INTRA	ORIG	QB-MSG	BILLED						
21	CLEC / ILEC	INTRA	ORIG		MESSAGES						
22	CLEC / ILEC	INTRA	TERM	LTF	BILLED						
23	CLEC / ILEC	INTRA	TERM		QTY MOU						
24	CLEC / ILEC	INTRA	TERM	LTT	BILLED						
25	CLEC / ILEC	INTRA	TERM		QTY MOU						
26	CLEC / ILEC	INTRA	TERM	NS	BILLED						
27	CLEC / ILEC	INTRA	TERM		QTY MOU						
28	CLEC / ILEC	LOCAL	TERM	RECIP	BILLED						
29	CLEC / ILEC	LOCAL	TERM		QTY MOU						
30	IXC	INTER	ORIG	LTS	BILLED						
31	IXC	INTER	ORIG		QTY MOU						
32	IXC	INTER	ORIG	LTS-DC	BILLED						
33	IXC	INTER	ORIG		QTY MOU						
34	IXC	INTER	ORIG	QB-MSG	BILLED						

— redacted —

	A	B	C	D	E	L	M	N	O	P	Q
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201007	201008	201009	201010	201011	201012
2	CLEC / ILEC	INTER	ORIG	LTS	BILLED						
3	CLEC / ILEC	INTER	ORIG		QTY MOU						
4	CLEC / ILEC	INTER	ORIG	QB-MSG	BILLED						
5	CLEC / ILEC	INTER	ORIG		MESSAGES						
6	CLEC / ILEC	INTER	ORIG	SWAS	BILLED						
7	CLEC / ILEC	INTER	ORIG		QTY MOU						
8	CLEC / ILEC	INTER	ORIG	SWAS-DC	BILLED						
9	CLEC / ILEC	INTER	ORIG		QTY MOU						
10	CLEC / ILEC	INTER	TERM	SWAS	BILLED						
11	CLEC / ILEC	INTER	TERM		QTY MOU						
12	CLEC / ILEC	INTER	TERM	SWAS-DC	BILLED						
13	CLEC / ILEC	INTER	TERM		QTY MOU						
14	CLEC / ILEC	INTRA	ORIG	LTF	BILLED						
15	CLEC / ILEC	INTRA	ORIG		QTY MOU						
16	CLEC / ILEC	INTRA	ORIG	LTT	BILLED						
17	CLEC / ILEC	INTRA	ORIG		QTY MOU						
18	CLEC / ILEC	INTRA	ORIG	NS	BILLED						
19	CLEC / ILEC	INTRA	ORIG		QTY MOU						
20	CLEC / ILEC	INTRA	ORIG	QB-MSG	BILLED						
21	CLEC / ILEC	INTRA	ORIG		MESSAGES						
22	CLEC / ILEC	INTRA	TERM	LTF	BILLED						
23	CLEC / ILEC	INTRA	TERM		QTY MOU						
24	CLEC / ILEC	INTRA	TERM	LTT	BILLED						
25	CLEC / ILEC	INTRA	TERM		QTY MOU						
26	CLEC / ILEC	INTRA	TERM	NS	BILLED						
27	CLEC / ILEC	INTRA	TERM		QTY MOU						
28	CLEC / ILEC	LOCAL	TERM	RECIP	BILLED						
29	CLEC / ILEC	LOCAL	TERM		QTY MOU						
30	IXC	INTER	ORIG	LTS	BILLED						
31	IXC	INTER	ORIG		QTY MOU						
32	IXC	INTER	ORIG	LTS-DC	BILLED						
33	IXC	INTER	ORIG		QTY MOU						
34	IXC	INTER	ORIG	QB-MSG	BILLED						

— redacted —

	A	B	C	D	E	R	S	T	U	V	W
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201101	201102	201103	201104	201105	TOTAL
2	CLEC / ILEC	INTER	ORIG	LTS	BILLED						
3	CLEC / ILEC	INTER	ORIG		QTY MOU						
4	CLEC / ILEC	INTER	ORIG	QB-MSG	BILLED						
5	CLEC / ILEC	INTER	ORIG		MESSAGES						
6	CLEC / ILEC	INTER	ORIG	SWAS	BILLED						
7	CLEC / ILEC	INTER	ORIG		QTY MOU						
8	CLEC / ILEC	INTER	ORIG	SWAS-DC	BILLED						
9	CLEC / ILEC	INTER	ORIG		QTY MOU						
10	CLEC / ILEC	INTER	TERM	SWAS	BILLED						
11	CLEC / ILEC	INTER	TERM		QTY MOU						
12	CLEC / ILEC	INTER	TERM	SWAS-DC	BILLED						
13	CLEC / ILEC	INTER	TERM		QTY MOU						
14	CLEC / ILEC	INTRA	ORIG	LTF	BILLED						
15	CLEC / ILEC	INTRA	ORIG		QTY MOU						
16	CLEC / ILEC	INTRA	ORIG	LTT	BILLED						
17	CLEC / ILEC	INTRA	ORIG		QTY MOU						
18	CLEC / ILEC	INTRA	ORIG	NS	BILLED						
19	CLEC / ILEC	INTRA	ORIG		QTY MOU						
20	CLEC / ILEC	INTRA	ORIG	QB-MSG	BILLED						
21	CLEC / ILEC	INTRA	ORIG		MESSAGES						
22	CLEC / ILEC	INTRA	TERM	LTF	BILLED						
23	CLEC / ILEC	INTRA	TERM		QTY MOU						
24	CLEC / ILEC	INTRA	TERM	LTT	BILLED						
25	CLEC / ILEC	INTRA	TERM		QTY MOU						
26	CLEC / ILEC	INTRA	TERM	NS	BILLED						
27	CLEC / ILEC	INTRA	TERM		QTY MOU						
28	CLEC / ILEC	LOCAL	TERM	RECIP	BILLED						
29	CLEC / ILEC	LOCAL	TERM		QTY MOU						
30	IXC	INTER	ORIG	LTS	BILLED						
31	IXC	INTER	ORIG		QTY MOU						
32	IXC	INTER	ORIG	LTS-DC	BILLED						
33	IXC	INTER	ORIG		QTY MOU						
34	IXC	INTER	ORIG	QB-MSG	BILLED						

— redacted —

	A	B	C	D	E	F	G	H	I	J	K
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201001	201002	201003	201004	201005	201006
35	IXC	INTER	ORIG		MESSAGES						
36	IXC	INTER	ORIG	SWAS	BILLED						
37	IXC	INTER	ORIG		QTY MOU						
38	IXC	INTER	ORIG	SWAS-DC	BILLED						
39	IXC	INTER	ORIG		QTY MOU						
40	IXC	INTER	TERM	SWAS	BILLED						
41	IXC	INTER	TERM		QTY MOU						
42	IXC	INTER	TERM	SWAS-DC	BILLED						
43	IXC	INTER	TERM		QTY MOU						
44	IXC	INTRA	ORIG	LTF	BILLED						
45	IXC	INTRA	ORIG		QTY MOU						
46	IXC	INTRA	ORIG	LTS	BILLED						
47	IXC	INTRA	ORIG		QTY MOU						
48	IXC	INTRA	ORIG	LTS-DC	BILLED						
49	IXC	INTRA	ORIG		QTY MOU						
50	IXC	INTRA	ORIG	LTT	BILLED						
51	IXC	INTRA	ORIG		QTY MOU						
52	IXC	INTRA	ORIG	NS	BILLED						
53	IXC	INTRA	ORIG		QTY MOU						
54	IXC	INTRA	ORIG	PORT-C	BILLED						
55	IXC	INTRA	ORIG		QTY MOU						
56	IXC	INTRA	ORIG	QB-MSG	BILLED						
57	IXC	INTRA	ORIG		MESSAGES						
58	IXC	INTRA	ORIG	TMUX	BILLED						
59	IXC	INTRA	ORIG		QTY MOU						
60	IXC	INTRA	TERM	LTF	BILLED						
61	IXC	INTRA	TERM		QTY MOU						
62	IXC	INTRA	TERM	LTT	BILLED						
63	IXC	INTRA	TERM		QTY MOU						
64	IXC	INTRA	TERM	NS	BILLED						
65	IXC	INTRA	TERM		QTY MOU						
66	REVENUE BILLED										

— redacted —

	A	B	C	D	E	L	M	N	O	P	Q
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201007	201008	201009	201010	201011	201012
35	IXC	INTER	ORIG		MESSAGES						
36	IXC	INTER	ORIG	SWAS	BILLED						
37	IXC	INTER	ORIG		QTY MOU						
38	IXC	INTER	ORIG	SWAS-DC	BILLED						
39	IXC	INTER	ORIG		QTY MOU						
40	IXC	INTER	TERM	SWAS	BILLED						
41	IXC	INTER	TERM		QTY MOU						
42	IXC	INTER	TERM	SWAS-DC	BILLED						
43	IXC	INTER	TERM		QTY MOU						
44	IXC	INTRA	ORIG	LTF	BILLED						
45	IXC	INTRA	ORIG		QTY MOU						
46	IXC	INTRA	ORIG	LTS	BILLED						
47	IXC	INTRA	ORIG		QTY MOU						
48	IXC	INTRA	ORIG	LTS-DC	BILLED						
49	IXC	INTRA	ORIG		QTY MOU						
50	IXC	INTRA	ORIG	LTT	BILLED						
51	IXC	INTRA	ORIG		QTY MOU						
52	IXC	INTRA	ORIG	NS	BILLED						
53	IXC	INTRA	ORIG		QTY MOU						
54	IXC	INTRA	ORIG	PORT-C	BILLED						
55	IXC	INTRA	ORIG		QTY MOU						
56	IXC	INTRA	ORIG	QB-MSG	BILLED						
57	IXC	INTRA	ORIG		MESSAGES						
58	IXC	INTRA	ORIG	TMUX	BILLED						
59	IXC	INTRA	ORIG		QTY MOU						
60	IXC	INTRA	TERM	LTF	BILLED						
61	IXC	INTRA	TERM		QTY MOU						
62	IXC	INTRA	TERM	LTT	BILLED						
63	IXC	INTRA	TERM		QTY MOU						
64	IXC	INTRA	TERM	NS	BILLED						
65	IXC	INTRA	TERM		QTY MOU						
66	REVENUE BILLED										

— redacted —

	A	B	C	D	E	R	S	T	U	V	W
1	CUST CATEGORY	JURISD	DIR	RATE ELE- MENT ID		201101	201102	201103	201104	201105	TOTAL
35	IXC	INTER	ORIG		MESSAGES						
36	IXC	INTER	ORIG	SWAS	BILLED						
37	IXC	INTER	ORIG		QTY MOU						
38	IXC	INTER	ORIG	SWAS-DC	BILLED						
39	IXC	INTER	ORIG		QTY MOU						
40	IXC	INTER	TERM	SWAS	BILLED						
41	IXC	INTER	TERM		QTY MOU						
42	IXC	INTER	TERM	SWAS-DC	BILLED						
43	IXC	INTER	TERM		QTY MOU						
44	IXC	INTRA	ORIG	LTF	BILLED						
45	IXC	INTRA	ORIG		QTY MOU						
46	IXC	INTRA	ORIG	LTS	BILLED						
47	IXC	INTRA	ORIG		QTY MOU						
48	IXC	INTRA	ORIG	LTS-DC	BILLED						
49	IXC	INTRA	ORIG		QTY MOU						
50	IXC	INTRA	ORIG	LTT	BILLED						
51	IXC	INTRA	ORIG		QTY MOU						
52	IXC	INTRA	ORIG	NS	BILLED						
53	IXC	INTRA	ORIG		QTY MOU						
54	IXC	INTRA	ORIG	PORT-C	BILLED						
55	IXC	INTRA	ORIG		QTY MOU						
56	IXC	INTRA	ORIG	QB-MSG	BILLED						
57	IXC	INTRA	ORIG		MESSAGES						
58	IXC	INTRA	ORIG	TMUX	BILLED						
59	IXC	INTRA	ORIG		QTY MOU						
60	IXC	INTRA	TERM	LTF	BILLED						
61	IXC	INTRA	TERM		QTY MOU						
62	IXC	INTRA	TERM	LTT	BILLED						
63	IXC	INTRA	TERM		QTY MOU						
64	IXC	INTRA	TERM	NS	BILLED						
65	IXC	INTRA	TERM		QTY MOU						
66	REVENUE BILLED										

— redacted —

ENTITY /ST	MONTH	JUR	RATE_ELEM ENT_ID	DIR.	QTY MOU	TOTAL MOU	MSGs	BILLED	CARRIER CAT
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					CLEC / ILEC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					CLEC / ILEC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS	O					IXC
LU / KY	201001	INTER	LTS-DC	O					IXC
LU / KY	201001	INTER	LTS-DC	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					CLEC / ILEC
LU / KY	201001	INTER	QB-MSG	O					CLEC / ILEC
LU / KY	201001	INTER	QB-MSG	O					CLEC / ILEC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					CLEC / ILEC
LU / KY	201001	INTER	QB-MSG	O					CLEC / ILEC
LU / KY	201001	INTER	QB-MSG	O					IXC
LU / KY	201001	INTER	QB-MSG	O					IXC

— redacted —

Note: Confidential version extends for an additional 4831 rows.

Request:

10. For 2010, and for 2011 most recent data available, for you and your 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.

Response:

Data responsive to the request — by month and by jurisdiction — are provided in the table below.

BILL_MONTH	FLD_NAME Total Usage Charges:	Sum of AMT	Sum of MOU				
2010-01	INTERSTATE	—redacted—					
	INTRASTATE						
	LOCAL						
	2010-01 Total						
2010-02	INTERSTATE			—redacted—			
	INTRASTATE						
	LOCAL						
	2010-02 Total						
2010-03	INTERSTATE					—redacted—	
	INTRASTATE						
	LOCAL						
	2010-03 Total						
2010-04	INTERSTATE	—redacted—					
	INTRASTATE						
	LOCAL						
	2010-04 Total						

BILL_MONTH	FLD_NAME Total Usage Charges:	Sum of AMT	Sum of MOU				
2010-05	INTERSTATE	—redacted—					
	INTRASTATE						
	LOCAL						
	2010-05 Total						
2010-06	INTERSTATE			—redacted—			
	INTRASTATE						
	LOCAL						
	2010-06 Total						
2010-07	INTERSTATE					—redacted—	
	INTRASTATE						
	LOCAL						
	2010-07 Total						
2010-08	INTERSTATE	—redacted—					
	INTRASTATE						
	LOCAL						
	2010-08 Total						
2010-09	INTERSTATE			—redacted—			
	INTRASTATE						
	LOCAL						
	2010-09 Total						
2010-10	INTERSTATE					—redacted—	
	INTRASTATE						
	LOCAL						
	2010-10 Total						
2010-11	INTERSTATE	—redacted—					
	INTRASTATE						
	LOCAL						
	2010-11 Total						
2010-12	INTERSTATE			—redacted—			
	INTRASTATE						
	LOCAL						

BILL_MONTH	FLD_NAME Total Usage Charges:	Sum of AMT	Sum of MOU
	2010-12 Total	—redacted—	
2011-01	INTERSTATE		
	INTRASTATE		
	LOCAL		
	2011-01 Total		
2011-02	INTERSTATE		
	INTRASTATE		
	LOCAL		
	2011-02 Total		
2011-03	INTERSTATE		
	INTRASTATE		
	LOCAL		
	2011-03 Total		
2011-04	INTERSTATE		
	INTRASTATE		
	LOCAL		
	2011-04 Total		
2011-05	INTERSTATE		
	INTRASTATE		
	LOCAL		
	2011-05 Total		
GRAND TOTAL			

Request:

11. 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”).

Response: A PAETEC tool for tracking phantom traffic is just in the process of being developed. However, a PAETEC-wide very rough estimate is that approximately 7% of terminating minutes cannot be billed.

Request:

12. 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.

Response:

Per filed tariffs, it is the PAETEC practice to bill non-identifiable traffic as 50% interstate and 50% intrastate. The PAETEC interstate tariff provides:

2.11.8 Jurisdictional Reports

Where such information is available, the Company will determine the jurisdiction of both originating and terminating calls from the call detail records generated via the switched network, and bill usage according to such determination. A call will be classified as interstate where the call detail indicates that the calling and called parties are in different states. A call will be classified as intrastate where the call detail indicates that the calling and called parties are in the same state. While the Company recognizes that the use of call detail to jurisdictionalize calls may occasionally result in the misclassification of individual calls involving wireless or commercial mobile radio service (CMRS) customers roaming outside their home states, the aggregate ratio of interstate to intrastate calling will be presumed to be equal to that indicated by the call detail records, unless the Customer provides evidence sufficient to establish a different ratio in the dispute process. In those cases where it is not possible for the Company to determine the jurisdiction of the call from the call detail, the Customer may provide the Company with a percent interstate use. The percent, which should be represented as a whole number, is determined by taking the total interstate usage and dividing by the total minutes of use. The Customer may update the jurisdictional percentages reported to the Company on the First of January, First of April, First of July, and First of October. Reports should be received no later than the 20th of each month. Reports will be used on a go-forward basis, and will be in effect until the Customer submits a revised report. Customers beginning service in the middle of a quarter

may submit a jurisdictional report at the onset of service. In the absence of a Customer-provided percent interstate use for traffic where the jurisdiction cannot be determined, the PIU is defaulted to 50%.

Request:

13. 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.

Response:

There is no known such estimate.

Request:

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

Response:

No.

Request:

15. 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)?

Response:

In comments filed with the FCC in the various intercarrier compensation reform dockets, PAETEC has explained that its costs are higher than the costs of its RBOC counterparts, and that requiring PAETEC to mirror RBOC interstate rate levels did not allow PAETEC to recover its costs. PAETEC also filed its cost study information (confidentially), demonstrating its cost per minute, which is below the benchmark. The cost study is discussed in Ex Parte Comments of PAETEC, CC Docket No. 01-92 and WC Docket No. 04-36, at attached Declaration of Michael Starkey at 2 and 7 (filed Oct. 17, 2008), and again referenced in PAETEC's May 1, 2011 comments filed in the intercarrier compensation reform proceeding, both of which are publicly available in a redacted form.

Request:

16. 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.

Response:

- a. No.
- b. No.
- c. No.
- d. No.

Request:

17. In accordance with the FCC's April 26, 2001 Seventh Report and Order in CC Docket 96-262, have you capped your interstate switched access rates to the level of the interstate switched access rates of the incumbent local exchange carrier with which you compete?

Response:

Yes, US LEC / PAETEC has complied with the FCC benchmark. In litigation in federal court, that compliance was challenged by Verizon. The decisions of the U.S. District Court for the Eastern District of Pennsylvania in the case, styled *PAETEC Communications, Inc. et al. v. MCI Communications Servs., Inc. et al.*, are reported at 712 F. Supp.2d 405 (E.D. Pa.2010) and 2011 WL 1886047 (E.D. Pa. 2011); the case is currently on appeal to the U.S. Court of Appeals for the Third Circuit. US LEC of Tennessee Inc. is one of the named parties doing business as "PAETEC Business Services" and referred to collectively as PAETEC.

Request:

18. 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;
- 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?

Response:

STATES CURRENTLY MIRRORING ILEC

STATE	RATE STATUS
CO	parity with ILEC state
DC	parity with FCC rates
MA	parity with ILEC state
MO	parity with state rates / plus reducing by 6% each year to meet FCC rate
NC	parity with ILEC state
NM	parity with FCC rates
NY	parity with ILEC state
PA	parity with ILEC state
SD	parity with ILEC state
VA	parity with ILEC state

STATES FUTURE PROCESS TO MIRROR ILEC

STATE	RATE STATUS
CA	billing per state mandate 10% over highest ILEC
GA	effective 1/1/2011, 10 year plan to reduce to FCC rates
IL	effective 1/1/2011, 2.5 year plan to reduce to FCC rates
MI	effective 1/1/2011, 5 year plan to start reducing to FCC rate
NJ	eff. 2/2011, match ILEC composite rate then reduce each year to FCC by 2013
OH	pending orders from oh commission
TN	pending order from TN to start reducing to interstate rates eff. 4/2012, to be in full parity by 4/2016
TX	billing state mandated safe harbor rates

Request:

19. Do you or any of your parent companies or affiliates in any other state mirror the intrastate access rates or any individual rate elements of the competing ILEC, or have you or any of your parent companies or affiliates been ordered to do so in the future?

- a. Please list all states where you 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 to mirror these rates;
- c. Please state whether you 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?

Response:

See response to Data Request #18.

Request:

20. If not otherwise identified in Data Requests 18 and 19, have you or any of your parent companies or affiliates in any other state been ordered to restrict its access rates in any way?
- a. Please list all states where your access rates are restricted and describe the restriction;
 - b. Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you to restrict your access rates;
 - c. Please state whether you 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?

Response:

See response to Data Request #18.

Request:

21. 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.

Response:

Yes, most recently in PAETEC's 5/1/2011 comments filed in the intercarrier compensation reform proceeding (referenced in response to Data Request #15).

Request:

22. 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.

Response:

Yes. *See* tariff, Kentucky P.S.C. No. 3, for Long Distance Communications Services, available for viewing and downloading at the Kentucky PSC website:

http://psc.ky.gov/tariffs/Telecommunications/Telecommunications_N-Z/US%20LEC%20of%20Tennessee,%20Inc/Tariff%20No.%203%20-%20Interexchange.pdf

Request:

23. 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.

Response:

OBJECTION. This request is overly broad and unduly burdensome, particularly because the information sought (a) is of no apparent relevance to this proceeding and (b) constitutes financial and operational data that would give existing and potential competitors an unfair commercial advantage vis-à-vis PAETEC.

Request:

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

Response:

No.

Request:

25. 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.

Response:

Such revenues are included in the response to Data Request #2.

Request:

26. Provide a schedule reflecting your local rates for residential and business customers by rate group for the last 10 years.

Response:

A tariff (including rates charged) for local exchange services — US LEC of Tennessee Inc., Kentucky P.S.C. No. 2 — has been on file with the Kentucky PSC and effective since May 30, 1999. Cancelled pages from that tariff are available from the PSC, and the currently effective tariff may be viewed and downloaded from the PSC's website:

http://psc.ky.gov/tariffs/Telecommunications/Telecommunications_N-Z/US%20LEC%20of%20Tennessee,%20Inc/Tariff%20No.%202%20-%20Local%20Exchange.pdf