

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

**2nd Set of Data Requests from  
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 second set of data requests to be answered by the party or parties indicated:

- each incumbent local exchange carrier (ILEC);
- the AT&T entities;
- the Sprint Nextel entities;
- the Verizon entities; and,
- the Windstream entities.

There are parties to whom these data requests are addressed that have filed responses to data requests or direct testimony under a request for confidential treatment, and who have not disclosed that information to any representative of TWTC, Level 3, or PAETEC. As with their first set of data requests, TWTC, Level 3, and PAETEC therefore reserve their right to supplement these data requests once all information (*e.g.*, responses, direct testimony, exhibits) 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

Katherine K. Yunker

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**8/5/11 Data Requests to  
Incumbent Local Exchange Carriers (ILECs)**

Each of the following requests is to be answered by each ILEC that is a 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, for calendar years 2009 and 2010 separately, the amount of access revenue shift you would have experienced if your **intrastate terminating** switched access rates mirrored your **interstate terminating** switched access rates.
2. Provide the number of your **terminating** interstate and intrastate access minutes for 2009 and for 2010 (separately).
3. State, for calendar years 2009 and 2010 separately, the amount of access revenue shift you would have experienced if your intrastate and interstate **terminating** switched access rates mirrored your **reciprocal compensation** rates.
4. Provide the number of your **reciprocal compensation** minutes for 2009 and for 2010 (separately). This request is for the number of minutes on which you assess reciprocal compensation charges, not the number of minutes on which you paid reciprocal compensation.
5. Produce all workpapers, calculations, and formulas — in native format, including spreadsheets (Excel preferred) — for the revenue shift numbers stated in requests #1 and #3 above.

Note: On or about April 15, 2011, your company may have filed data with the Commission of the type requested herein, particularly in response to the 3/10/11 Order (Appx. A) mandate that ILECs provide “the amount of access revenue shift they would experience if their intrastate switched access rates mirror their interstate switched access rates.” To the extent that responsive data or materials have already been filed with the Commission or are being filed on August 29, 2011, in

response to Commission Staff data requests, your response to the request(s) herein may be made by providing the requesting parties with such data/materials or by providing a specific reference to such data/materials elsewhere provided to the requesting parties.

**8/5/11 Data Requests to AT&T:**  
**BellSouth Telecommunications, LLC 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 Service,**  
**and TCG Ohio**

Each of the following requests is to be answered by AT&T in addition to those applicable to AT&T as an ILEC. Reference to “you,” “your,” or “your company” is to BellSouth Telecommunications, LLC 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 Service, and TCG Ohio, or any one or more of them. 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. Do you (or an affiliate) accept residential customers’ presubscription to your intrastate long distance service in the areas in Kentucky not served by you (or an affiliate) as an ILEC? If yes, provide a link to a webpage (or similar citation to a publicly-available electronic document) that describes each residential intrastate long distance service available to such customers.
2. State the respective percentages of your business customers and of your residential customers who take bundled long-distance and local service.
3. Provide the average intrastate and interstate switched access rate per minute of use paid by AT&T long distance in 2010 in the following states:

Alabama	Colorado	Georgia	Indiana	Iowa	Kentucky
Louisiana	Maine	Michigan	Mississippi	Montana	Nevada
North Carolina	North Dakota	Ohio	Oregon	Pennsylvania	South Carolina
South Dakota	Tennessee	Vermont	Washington	Wisconsin	Wyoming

4. Provide, in electronic spreadsheet form (Excel preferred), the data underlying (confidential) Figure 6 on page 50 of Dr. Debra J. Aron's direct testimony filed July 8, 2011.
5. Has Dr. Aron ever compared AT&T's long distance prices in any state before and after change(s) to intrastate switched access rates that you contend constitute access reform? If so, provide each such analysis and describe the respective change(s) to intrastate switched access rates.
6. Has Dr. Ola A. Oyefusi ever compared AT&T's long distance prices in any state before and after change(s) to intrastate switched access rates that you contend constitute access reform? If so, provide each such analysis and describe the respective change(s) to intrastate switched access rates.
7. On page 31, lines 13-14 of Dr. Oyefusi's direct testimony filed July 8, 2011, it is claimed: "The FCC has established a cost-based rate for local call termination of 0.07¢ per minute...." Please provide all citations, documents and/or analyses on which Dr. Oyefusi relied to support this claim that \$0.0007 per minute is a cost-based rate.
8. Provide all workpapers, including those in native electronic spreadsheet form (Excel preferred), underlying the calculations presented in (confidential) Exhibit OAO-6 to Dr. Oyefusi's direct testimony.
9. On July 29, 2011, a group of six companies including you or your affiliate filed "America's Broadband Connectivity Plan" (ABC Plan) in FCC WC Docket No. 10-90 *et al.* Provide any estimate or analysis, and the supporting spreadsheets, assumptions, calculations, formulae, and other work papers, of the effect the ABC Plan would have on Kentucky.

**8/5/11 Data Requests to Sprint Nextel:**

**Sprint Communications Company L.P., Sprint Spectrum, L.P. and SprintCom, Inc. d/b/a  
Sprint PCS, Nextel West Corp., Inc., and NPCR, Inc., d/b/a Nextel Partners**

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. Do you (or an affiliate) accept residential customers' presubscription to your intrastate long distance service in the areas in circumstances where the customer does not also purchase local exchange service from Sprint or an affiliate? If yes, please provide a link to a webpage (or similar citation to a publicly-available electronic document) that describes each residential intrastate long distance service available to such customers.

**8/5/11 Data Requests to Verizon:**

**MCImetro Transmission Access Transmission Services LLC d/b/a Verizon Access Transmission Services, MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc., Teleconnect Long Distance Service & Systems d/b/a Telecom\*USA and Verizon Select Services, Inc.**

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. Do you (or an affiliate) accept residential customers' presubscription to your intrastate long distance service in the areas in circumstances where the customer does not also purchase local exchange service from Verizon or an affiliate? If yes, please provide a link to a webpage (or similar citation to a publicly-available electronic document) that describes each residential intrastate long distance service available to such customers.
2. On July 29, 2011, a group of six companies including you or your affiliate filed "America's Broadband Connectivity Plan" (ABC Plan) in FCC WC Docket No. 10-90 *et al.* Provide any estimate or analysis, and the supporting spreadsheets, assumptions, calculations, formulae, and other work papers, of the effect the ABC Plan would have on Kentucky.



**8/5/11 Data Requests to Windstream:  
Windstream Kentucky East, LLC and  
Windstream Kentucky West, LLC**

Each of the following requests is to be answered by Windstream in addition to those applicable to Windstream as an ILEC. Reference to “you,” “your,” or “your company” is to Windstream Kentucky East, LLC and Windstream Kentucky West, LLC, or either one of them. 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. Do you (or an affiliate) accept residential customers’ presubscription to your intrastate long distance service in the areas in Kentucky not served by you (or an affiliate) as an ILEC? If yes, provide a link to a webpage (or similar citation to a publicly-available electronic document) that describes each residential intrastate long distance service available to such customers.
2. State the respective percentages of your business customers and of your residential customers who take bundled long-distance and local service.
3. On July 29, 2011, a group of six companies including you or your affiliate filed “America’s Broadband Connectivity Plan” (ABC Plan) in FCC WC Docket No. 10-90 *et al.* Provide any estimate or analysis, and the supporting spreadsheets, assumptions, calculations, formulae, and other work papers, of the effect the ABC Plan would have on Kentucky.