

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH)
TELECOMMUNICATIONS, LLC FOR) CASE NO. 2015-00227
DECLARATORY ORDER REGARDING)
INTERCONNECTION WITH CENTRAL)
KENTUCKY NETWORK FOR 911/E911)
SERVICES TO PUBLIC SAFETY ANSWERING)
POINTS)

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S
INITIAL REQUESTS FOR INFORMATION
TO AT&T KENTUCKY**

Comes now the Lexington-Fayette Urban County Government ("LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of February 5, 2016 and submits its Initial Requests for Information to AT&T Kentucky ("AT&T") to be answered as follows:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self-evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

WHEREFORE, the Lexington-Fayette Urban County Government submits this Initial Requests for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500

BY:

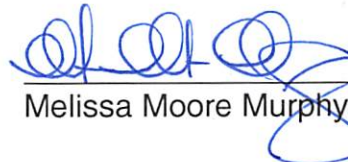


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FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document); that the electronic submission of these documents to the Commission was performed on March 18, 2016; that copies of these documents were mailed via first class U.S. Mail, postage prepaid, to the Kentucky Public Service Commission on March 18, 2016; and that there are currently no parties that have been excused from participation by electronic service.

BY:



Melissa Moore Murphy

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S
REQUESTS FOR INFORMATION**

1. Please list all governmental entities that have interconnection agreements with AT&T.
2. Does AT&T have any arrangement or written agreement with either the Kentucky State Police or Louisville MetroSafe regarding E911 services? If so please explain the arrangement in detail and provide a copy of any such agreement. If an arrangement exists but there is no agreement, please explain in detail why no agreement is needed.
3. Does AT&T currently have any arrangements under which it hands off calls from its Selective Router to a PSAP that owns a host controller, which in turn, passes the traffic to a remote PSAP's equipment in other counties? Please provide a detailed response.
 - a. If any such arrangements exist please provide a copy of any agreements or explain in detail why no agreement is needed.
 - b. If any such arrangement exists please list any liability concerns that AT&T has regarding each such arrangement and in what ways (if any) this differs from the concerns it has raised related to Central Kentucky Network ("CKN").
4. It is the understanding of LFUCG and CKN that both London/Laurel County 911 and Garrard/Lincoln County (Bluegrass 911) previously requested that AT&T selectively route landline calls and hand them off to CKN host controller. Please explain in detail whether AT&T is willing to do this, and if not, why not.
5. What is AT&T's position on the need for state and local agencies within the Commonwealth of Kentucky to become certificated as CLEC's in order to pass 911 calls between a host controller and a remote position in another agency? How does this differ from AT&T's demand that CKN be certificated?
6. Has AT&T ever offered CKN an agreement without demanding that it be certificated? If not, why not?
7. Please provide a detailed explanation of why AT&T believes that it cannot enter into an agreement with CKN without CKN being certificated.
8. Please provide a detailed listing of all expenditures made by AT&T related to its Selective Routers and E911 network in Kentucky.

9. Please list all jurisdictions in which AT&T has contracted E911 selective routing to Indigital or any other entity.
10. Does AT&T have any plans to contract out its 911 services in Kentucky?
11. In the event that the PSC determines that CKN is not required to be certificated but is required to contract with AT&T what type of agreement (e.g., commercial) does AT&T believe would be required and why?
12. Does AT&T currently have any agreements related to E911 services with Indigital? If so, please provide copies.
13. Does AT&T currently enter into E911 related agreements/contracts with entities that are not CLECs? Please provide copies of any such agreement.
14. Please provide AT&T's rationale as to why CKN, which is a not-for-profit affiliation comprised of local governments and their E911 providers, should be treated the same as a for profit entity.
15. Does AT&T have an interconnect agreement with Windstream? If so, please provide a copy.
16. Would it be an acceptable solution, if 911 cama trunks were directly connected to a PSAP or to the controller? If not, please explain.
17. Why was the relocation of CKN's primary selective router to a Windstream facility in 2014 not an acceptable solution to the issues raised by AT&T in this case?