

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
SUPPLEMENTAL 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 Supplemental 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 Supplemental Requests for Information.

Respectfully submitted,

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

BY:

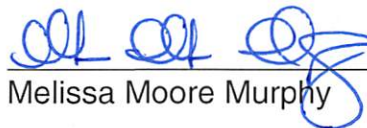


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FILING NOTICE AND CERTIFICATE

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 April 18, 2016; that copies of these documents were mailed via first class U.S. Mail, postage prepaid, to the Kentucky Public Service Commission on April 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
SUPPLEMENTAL REQUESTS FOR INFORMATION**

1. Please refer to your response to LFUCG Initial Request for Information No. 2. Please verify that there are no other written materials that are part of any contractual agreement between AT&T and Kentucky State Police ("KSP") related to E911 and provide copies of any such additional materials.
2. Please refer to your response to LFUCG Initial Request for Information No. 2. Please verify that there are there no other written materials that are part of any contractual agreement between AT&T and Louisville MetroSafe related to E911 and provide copies of any such additional materials.
3. Please refer to your response to LFUCG Initial Request for Information No. 2. Is KSP leasing a controller from AT&T or did KSP purchase it's controller from AT&T?
4. Central Kentucky Network ("CKN") is required to enter into an interconnection agreement or a commercial agreement, would the tariffs included as AT&T attachment 1 apply to CKN? If so, which ones?
5. After AT&T selectively routes calls for KSP and hands those calls to KSP, is AT&T aware if this is a "pass-through" or does KSP "touch" or handle the call in anyway?
6. Based on AT&T's verified petition dated August 4, 2015, AT&T raises concerns regarding the reliability of CKN's equipment. Within the last five (5) years has AT&T updated their technology, specifically its selective routers and controllers within the state of Kentucky? If yes, what was the cost of those updates?
7. Has AT&T entered into any contractual agreement with other Selective Router providers to provide 911 services on their behalf within the United States? If so, please list and describe each such arrangement.
8. Is it AT&T's belief that CKN is a for-profit entity? Is it AT&T understanding that Indigital is a for-profit entity?
9. Does AT&T have any contractual relationships nationally with any governmental E911 entities that are operating as CLEC's? If so, please list and describe each such arrangement.

10. Is it AT&T's position that if it was not required to route calls to CKN's selective router that it would be able to enter into an agreement with CKN without the necessity of CKN's status as CLEC being determined by the PSC? If the answer to the above question is no, please explain in detail.
11. If CKN entered into an arrangement with AT&T under which AT&T's calls were routed directly to CKN's controller instead of CKN's selective router is it AT&T's position that CKN would be required to be a CLEC? If the answer to the above question is yes, please explain in detail why, and also explain how this would differ in any material respect from the current arrangements AT&T has with KSP and Louisville MetroSafe.