

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

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**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S  
REPOSSES TO AT&T KENTUCKY'S FIRST SET OF  
DISCOVERY REQUESTS  
JUNE 30, 2016**

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1           1. Mr. Stack's testimony, at page 6 lines 25 through 27, states that "CKN has not  
2 asked AT&T Kentucky to connect to its Selective Router. Instead, several counties that  
3 joined the network have sent written requests to AT&T Kentucky requesting new  
4 trunking to the CKN Selective Router." Did CKN or its consultants advise the PSAPs  
5 joining the CKN network what to request of AT&T Kentucky in terms of new trunking  
6 and where to connect that trunking to the CKN network? If the answer is yes, when did  
7 CKN or its consultants advise the PSAPs joining the CKN network what to request of  
8 AT&T Kentucky in terms of new trunking and where to connect that trunking to the CKN  
9 network? Please provide all documentation between CKN or its consultants and the  
10 PSAPs in support of your answer.

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12           RESPONSE: Each county that joined the Central Kentucky 911 Network  
13 (CKN) was provided sample letters to submit to all telephone service  
14 providers operating in their jurisdiction. The sample letter and the  
15 verbiage contained therein were jointly prepared by LFUCG E911 and AK  
16 Associates, Inc.

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18           2. CKN and Windstream made a network diagram available to the parties,  
19 including AT&T Kentucky, attending the informal conference held at the KPSC on  
20 February 12, 2014. The diagram was titled "CKy911net Partnership between LFUCG,  
21 Windstream and AK Associates to provide NG911 Hosting Solution." CKN provided an  
22 updated version of the diagram to AT&T Kentucky on April 9, 2014. Did CKN use this  
23 diagram to describe that it wanted AT&T Kentucky to connect trunks from AT&T

1 Kentucky's central office or tandem, not a Selective Router, and terminate them on  
2 CKN's Selective Router?

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4 RESPONSE: Windstream created the diagram dated February 14, 2014  
5 (Exhibit LFUCG 1) and made it available during an informal conference in  
6 February 2014, Windstream also created the updated version of the  
7 diagram dated April 7, 2014 (Exhibit LFUCG 2). CKN is uncertain if these  
8 diagrams were used to describe that the CKN wanted AT&T Kentucky to  
9 connect trunks from AT&T Kentucky's central office or tandem, not a  
10 Selective Router, and terminate them on CKN's Selective Router

11 3. Is the diagram labeled "Central Kentucky 911 Network" and attached to  
12 Robert Stack's 5/19/16 testimony as Exhibit LFUCG 1 a different proposed  
13 arrangement/alternative to the one advanced by CKN in 2014, whereby CKN and its  
14 member PSAPs now request that AT&T Kentucky route its end-user 911 traffic to the  
15 member PSAPs? If so, please explain the difference.

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17 RESPONSE: Yes. The diagram labeled as Exhibit 1 outlines a method of  
18 connectivity for those PSAP's having AT&T provided land-line telephone  
19 service within their 911 service area.

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21 4. In Exhibit LFUCG 1, the first paragraph/note of the narrative states: "New  
22 AT&T CAMA Trk's for landline will be transferred to a Media Gateway and pointed to the  
23 CKy911Net CPE."

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a. AT&T Kentucky assumes “Trk’s” to mean Trunks. If “Trk’s” means something different, please identify what is meant by “Trk’s”.

RESPONSE: “Trks” means “trunks”.

b. In situations where AT&T Kentucky CAMA trunks currently exist at a PSAP that is transitioning to CKN, is it CKN’s or the PSAPs’ intent to install new AT&T Kentucky CAMA trunks or use the existing AT&T Kentucky CAMA trunks to connect to the proposed Media Gateway? If CKN or the PSAP are proposing new trunks where CAMA trunks already exist, please explain why there would be a need/requirement for AT&T Kentucky to install new AT&T CAMA trunks and what would happen to the existing CAMA trunks.

RESPONSE: If there are existing AT&T Cama Trunks at the PSAP in question, then those AT&T 911 Cama Trunks can be used. However, if the PSAP in question does not currently have AT&T Cama Trunks, then that PSAP will request those services from AT&T. Neither CKN, nor the PSAP making the request, is proposing new Cama Trunks where they already exist.

c. In situations where the PSAP handles 911 calls from AT&T end-users in the PSAP’s jurisdiction and AT&T CAMA trunks do not currently exist at a

1 PSAP that is transitioning to CKN, it is AT&T's understanding that the  
2 transitioning PSAP would order 911 service from AT&T Kentucky pursuant  
3 to AT&T Kentucky's tariff so that AT&T Kentucky end-user 911 calls can  
4 route to the PSAP's Media Gateway via newly established CAMA trunks.  
5 Is AT&T Kentucky's understanding consistent with the understanding of  
6 LFUCG and the PSAPs? If not, please explain why not.

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8 RESPONSE: Yes

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10 d. Is the proposed Media Gateway provided and provisioned by either CKN  
11 or the PSAP? If not, who would provide and provision the proposed Media  
12 Gateway?

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14 RESPONSE: Yes. The Solacom Media Gateway is provided and  
15 provisioned by CKN. The media gateway is the property of the PSAP.

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17 e. It is AT&T Kentucky's understanding that CKN or the PSAP, not AT&T  
18 Kentucky, would take the AT&T CAMA trunks from AT&T Kentucky's  
19 demarcation point and terminate the trunks to the proposed Media  
20 Gateway. Is AT&T Kentucky's understanding consistent with LFUCG's? If  
21 not, please explain why not.

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23 RESPONSE: Yes.

1           5. In Exhibit LFUCG 1, the second paragraph/note of the narrative states: “A  
2 Controller In-Bound Call Policy will be established, for each trunk, pointing the traffic  
3 back to the PSAP’s Guardian ER Ring Group.”

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5           a. It is AT&T Kentucky’s position that the second paragraph/note should  
6 specifically state: “A Controller In-Bound Call Policy will be established **by**  
7 **CKN**, for each trunk, pointing the traffic back to the PSAP’s Guardian ER  
8 Ring Group,” as it is AT&T Kentucky’s position that the responsible party  
9 (in this instance CKN) must be clearly delineated. Is AT&T Kentucky’s  
10 position consistent with LFUCG’s? If not, please explain why not.

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12           RESPONSE: Yes. The in-bound call policy is established by CKN.

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14           6. In Exhibit LFUCG 1, the third paragraph/note of the narrative states: “Only  
15 AT&T Tandem Transfers (Star Codes) will be allowed, not CKy911Net Tandem  
16 Transfers, and remain the responsibility of AT&T for Tandem Transfers”

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18           a. It is AT&T Kentucky’s position that the parties should make clear that  
19 AT&T Kentucky will make no changes to the features and functionality  
20 (speed dials, etc.) of the existing AT&T Kentucky tandem trunks, and that  
21 any request for changes must come from the local PSAP (e.g., Laurel  
22 County). Is AT&T Kentucky’s position consistent with LFUCG’s? If not,  
23 please explain why not.

1           **RESPONSE:** Yes. Existing AT&T Tandem Transfers (a/k/a Star Codes)  
2           will remain in effect. It is CKN's position not to ask for changes to AT&T  
3           functions and features. However, this position does not preclude the  
4           PSAP from communicating requested changes with AT&T as part of their  
5           business relationship.

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7           b. It is also AT&T Kentucky's position that it will bill the local PSAP for all  
8           services it performs for the PSAP (e.g., ANI and Selective Routing). Is  
9           AT&T Kentucky's understanding/position consistent with LFUCG's? If not,  
10          please explain why not.

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12          **RESPONSE:** Yes it is.

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14          7. In Exhibit LFUCG 1, the fifth paragraph/note of the narrative states: "The cost  
15          of the individual 911 CAMA trunks would be the responsibility of each PSAP needing  
16          such and would agree to said additional cost."

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18          a. It is AT&T Kentucky's understanding that for AT&T Kentucky ILEC landline  
19          customers, AT&T Kentucky would, pursuant to its tariff, bill the PSAP for  
20          ANI and Selective Routing, per thousand AT&T Kentucky ILEC access  
21          lines. Therefore, AT&T Kentucky proposes that the fifth paragraph/note  
22          read: "For AT&T ILEC landline customers, AT&T Kentucky will bill the  
23          PSAP for ANI and Selective Routing, per thousand AT&T ILEC access

1 lines.” Is AT&T Kentucky’s understanding consistent with LFUCG’s? If not,  
2 please explain why not.

3  
4 RESPONSE: CKN takes no position on AT&T’s tariffs and its business  
5 relationship and agreement with a particular PSAP, therefore CKN does  
6 not agree with the proposition that the 5<sup>th</sup> paragraph in Exhibit 1 needs to  
7 change.

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9 8. AT&T Kentucky proposes that for purposes of clarity, there be inserted a  
10 dotted line in Exhibit LFUCG 1 to clearly delineate the responsibilities of AT&T Kentucky  
11 vs. CKN or the PSAP, and that the dotted line start at the top to the right of the AT&T  
12 Kentucky SR and go down to the right of the AT&T Kentucky demarc for 9-1-1 CAMA  
13 trunks such that the AT&T Kentucky Landline Customer, AT&T Kentucky SR and AT&T  
14 Kentucky DeMarc 911 CAMA’s are positioned to the left of this dotted line to reflect  
15 AT&T Kentucky’s area of responsibility. Does LFUCG agree with AT&T Kentucky’s  
16 recommendation? If not, please explain why not.

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18 RESPONSE: CKN does not agree with adding a dotted line to the  
19 diagram. If there is a connection issue involving the AT&T Cama Trunk  
20 passing information, then AT&T, the PSAP, and CKN need to work  
21 together toward a resolution. A dotted line suggests to CKN that AT&T’s  
22 responsibility ends with the delivery of the Cama Trunk.



1           9. In Exhibit LFUCG 1, the diagram depicts "Carrier T-1's" between an ISPR and  
2 a building.

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4           a. It is AT&T Kentucky's position that the parties should make clear that is  
5 the "ISPR" a CKN selective router? If not, what is the ISPR?

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7           RESPONSE: Yes.

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9           b. What are the "Carrier T-1's" and are any of those AT&T Kentucky T-1's or  
10 do they contain AT&T Kentucky trunks from an AT&T Kentucky switch  
11 (AT&T Kentucky end office or 911 Tandem/Selective Router)?

12  
13           RESPONSE: The T-1's noted are T-1 Circuits from various ILEC, CLEC,  
14 VSP, and wireless telephone service providers operating within the  
15 partner PSAP's jurisdiction/service area. This excludes AT&T Kentucky  
16 circuits.

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18           10. Regarding the issue of trouble shooting in relation to Mr. Stack's 5/19/16  
19 testimony and Exhibit LFUCG 1, it is AT&T Kentucky's understanding that AT&T  
20 Kentucky will test to its existing AT&T 9-1-1 CAMA trunk demarc, and that CKN or the  
21 PSAP will then do any necessary testing beyond that point. Is AT&T Kentucky's  
22 understanding consistent with LFUCG's? If not, please explain why not.

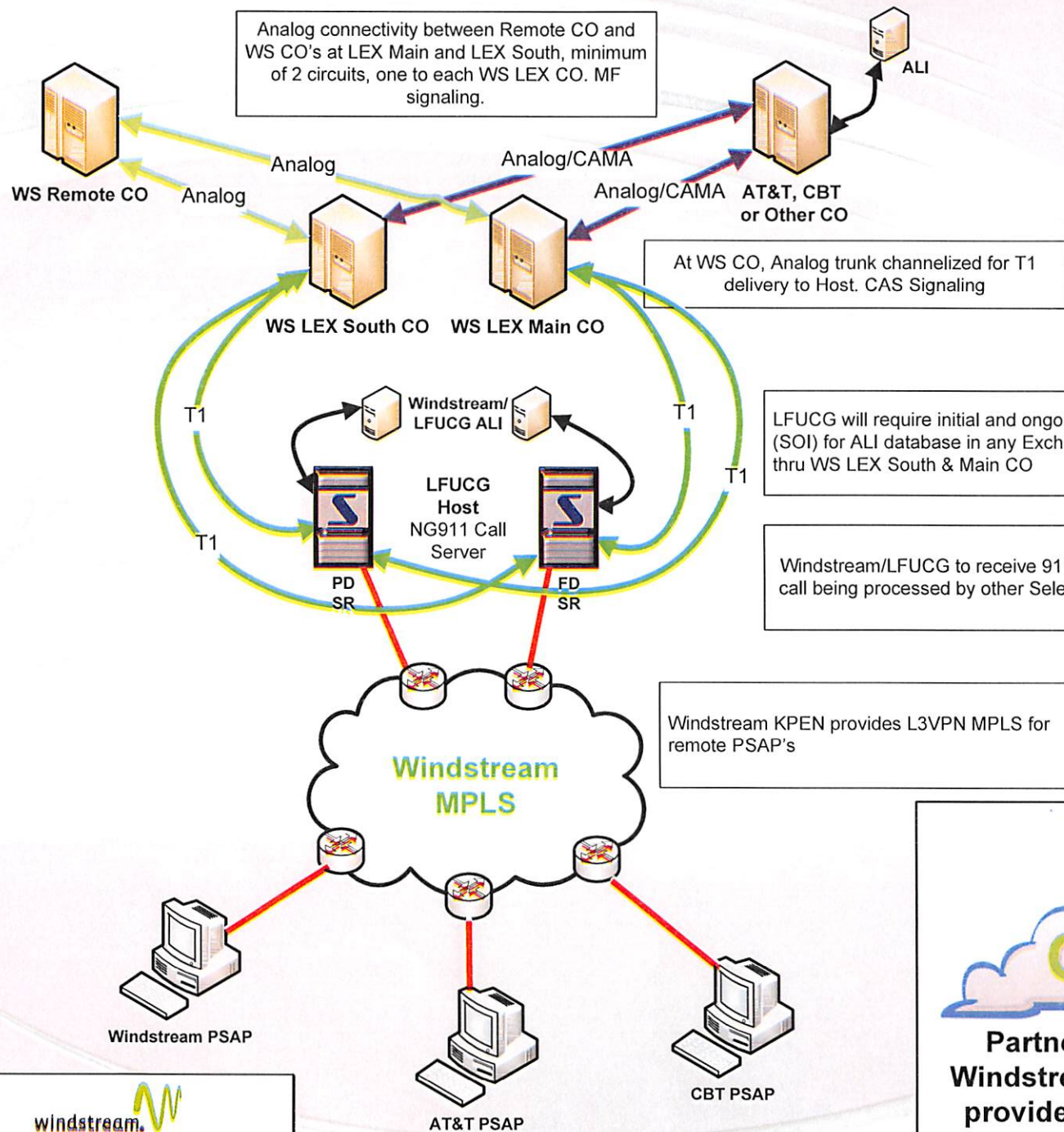
1           **RESPONSE:** Upon connection to the CKN Media Gateway, AT&T will  
2 work and test jointly with AK Associates, the managed services provider  
3 for CKN, to ensure “Wink Test” and operational status of the trunks, before  
4 said trunks are placed into service. It is CKN’s understanding that testing  
5 will include both circuit tests and call testing jointly conducted by AT&T  
6 and CKN via AK Associates, and testing will not be considered complete  
7 until it can be proven that by all parties (i.e., AT&T, PSAP, and CKN) that  
8 AT&T customer 911 calls can be placed and received at the designated  
9 PSAP, complete with ANI and ALI delivery.

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11           11. Per Mr. Stack’s 5/19/16 testimony (on behalf of LFUCG), it is AT&T  
12 Kentucky’s understanding that the twenty-five partner members of the Central Kentucky  
13 911 Network with AT&T Kentucky end-users in their PSAP jurisdiction would also  
14 request the alternative transport method discussed by Mr. Stack- specifically that AT&T  
15 Kentucky would continue to selectively route the call to the proper Public Safety  
16 Answering Point (PSAP), where the PSAP has a Media Gateway that is connected to  
17 the CKN Controller. Is AT&T Kentucky’s understanding consistent with LFUCG’s? If not,  
18 please explain why not.

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20           **RESPONSE:** Alternate routing for AT&T is configured between the PSAP  
21 and AT&T and is acted upon by the PSAP contacting AT&T to initiate  
22 alternate routing. Normally, calls are re-directed to another PSAP with  
23 AT&T connections (e.g., Kentucky State Police Post). A PSAP making

1           such a request might be experiencing a media gateway failure. However,  
2           this does not apply to all twenty-five partner members of the Central  
3           Kentucky 911 Network, since this alternate transport method only applies  
4           to current and potentially future CKN partners located in AT&T land-line  
5           territory.

6



Analog connectivity between Remote CO and WS CO's at LEX Main and LEX South, minimum of 2 circuits, one to each WS LEX CO. MF signaling.

At WS CO, Analog trunk channelized for T1 delivery to Host. CAS Signaling

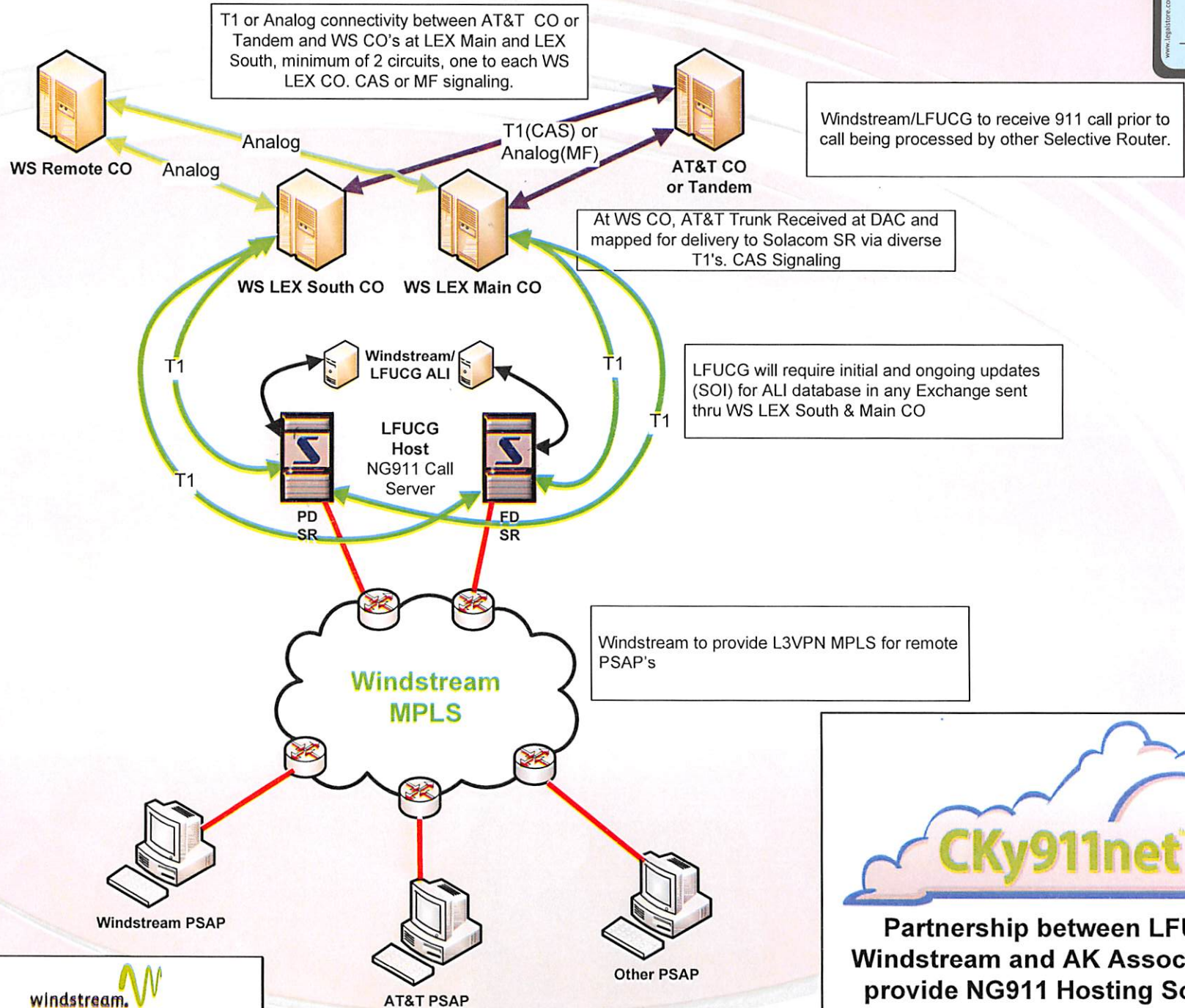
LFUCG will require initial and ongoing updates (SOI) for ALI database in any Exchange sent thru WS LEX South & Main CO

Windstream/LFUCG to receive 911 call prior to call being processed by other Selective Router.

Windstream KPN provides L3VPN MPLS for remote PSAP's



**Partnership between LFUCG, Windstream and AK Associates to provide NG911 Hosting Solution**



**CKy911net™**

Partnership between LFUCG, Windstream and AK Associates to provide NG911 Hosting Solution