

**BEFORE THE KENTUCKY
PUBLIC SERVICE COMMISSION**

BellSouth Telecommunications, Inc. Petition)	
for Declaratory Order Regarding Interconnection)	No. 2015-0227
with Central Kentucky Network for)	
911/E911 Service to Public Safety Answering)	
Points)	

**AT&T KENTUCKY’S RESPONSES TO LONDON-LAUREL COUNTY
COMMUNICATIONS CENTER’S INITIAL REQUEST FOR INFORMATION**

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (“AT&T Kentucky”)

hereby provides its responses to the London-Laurel County Communications Center’s Initial Request for Information.

GENERAL OBJECTIONS

1. AT&T Kentucky objects to these requests to the extent they seek information or material that is irrelevant, immaterial, or not reasonably calculated to lead to the discovery of admissible evidence.
2. AT&T Kentucky objects to these requests to the extent they are unduly broad, unduly burdensome, or call for an analysis of information that AT&T Kentucky has not performed and does not perform in the usual course of business.
3. AT&T Kentucky objects to these interrogatories to the extent they call for information or documents protected by the attorney-client privilege or any other applicable privilege.
4. AT&T Kentucky objects to these interrogatories to the extent they seek information not required under the Kentucky Rules of Civil Procedure.
5. AT&T Kentucky objects to the “Definitions” to the extent they depart from normal industry usage or AT&T Kentucky’s understanding of a term.

6. AT&T Kentucky objects to the requests to the extent they seek information regarding any jurisdiction other than Kentucky or any entity other than AT&T Kentucky, and will answer the requests only as they relate to Kentucky and AT&T Kentucky,

7. AT&T Kentucky objects to the requests to the extent they purport to impose a continuing or ongoing obligation on AT&T Kentucky.

1. The Center has requested that AT&T selectively route landline calls and hand them off to the Central Kentucky Network ("CKN") host controller. (See attachment 1, email from Craig Bennett, to Michael Holt dated August 14, 2015). The Kentucky State Police ("KSP") and Louisville MetroSafe receive 911 calls for multiple counties from AT&T's Selective Router and pass the calls through their host controller before delivering to the remote positions in the counties they serve. Please differentiate how the Center's request differs from the KSP and Louisville MetroSafe arrangements with AT&T. Also, please provide any contracts or agreements with the KSP and/or Louisville Metrosafe for said arrangements.

Response: AT&T Kentucky objects to the premise of the request regarding the requests made to AT&T Kentucky. Subject to and without waiver of this objection, the request to AT&T Kentucky from London/Laurel County dated May 30, 2014 was for AT&T Kentucky to "order new trunking ... to the following CKy911 Network™ Selective Router locations, bypassing the existing Windstream's selective router and terminating on a smartjack in the 911 equipment room." The request goes on to identify the CKN selective routers as the point of termination. Per the London/Laurel County request, those trunks would carry 911 landline calls to the CKN Selective Router, not a CKN host controller. AT&T Kentucky believes CKN must be a certificated 911 provider and enter into an interconnection agreement before AT&T Kentucky will route 911 calls to the CKN Selective Router. AT&T Kentucky does selectively route 911 landline calls to the KSP and Louisville MetroSafe ALI/ANI host controllers, which are not selective routers.

Responsible witness: N/A

2. As noted in request #1, the Center has requested that AT&T selectively route landline calls and hand them off to the CKN host controller. Please explain in detail whether AT&T is willing to do this, and if not, why not.

Response: AT&T Kentucky objects to the premise of the question regarding the requests made to AT&T Kentucky. Subject to and without waiver of this objection, the requests by Laurel/London and Garrard/Lincoln were for AT&T Kentucky to “order new trunking ... to the following CKy911 Network™ Selective Router locations, bypassing the existing Windstream’s Selective Routers, and terminating, on a smart jack in the 9-1-1 equipment room.” Both requests go on to identify the CKN selective routers as the point of termination. Per these requests, AT&T Kentucky would connect trunks to CKN’s Selective Router, not to a CKN ANI/ALI controller. AT&T Kentucky would need more technical information from CKN to determine details to selectively route calls from AT&T Kentucky’s Selective Router to a CKN ANI/ALI controller.

Responsible witness: N/A

3. Does AT&T charge land line customers in London/Laurel County a fee for Enhanced 911, despite the fact that AT&T does not provide the Center with ANI/ALI through administrative lines? Is so, please indicate the amount of said fee?

Response: No, AT&T Kentucky does not charge such a “fee.” Rather, AT&T Kentucky, on behalf of and at the request of London/Laurel County, collects an E911 surcharge and remits the surcharge to London/Laurel County, which is the entity that requested that AT&T Kentucky route 911 traffic over administrative lines not capable of supporting Enhanced 911. To AT&T Kentucky’s knowledge, London/Laurel County has not asked it to stop collecting and remitting the E911 surcharge.

Responsible witness: N/A

4. Would AT&T be willing to negotiate an agreement with CKN or the Center if CKN were not required to be certificated?

Response: If the Commission were to find that CKN is not required to be certificated, AT&T Kentucky would want to negotiate a commercial agreement with CKN. AT&T Kentucky has already notified CKN of its willingness to negotiate an agreement in order to avoid delays after the Commission renders its decision in this matter, since some form of agreement (interconnection agreement or commercial agreement) will be necessary regardless of the outcome.

Responsible witness: N/A

5. Has AT&T made its customers in Laurel County aware that the Center is not receiving Enhanced 911, though said AT&T customers are paying for this service? If so, please provide a copy of said notification.

Response: AT&T Kentucky objects to this request as being irrelevant and unlikely to lead to the discovery of relevant or admissible evidence. Subject to and without waiving this objection, AT&T Kentucky states that it has not provided such a notice, nor is it aware of London/Laurel County, which requested the rerouting of 911 traffic over administrative lines not capable of supporting Enhanced 911, providing such a notice. Please also see AT&T Kentucky's response to question 3.

Responsible witness: N/A