

**BEFORE THE KENTUCKY
PUBLIC SERVICE COMMISSION**

BellSouth Telecommunications, Inc. Petition)
for Declaratory Order Regarding Interconnection)
with Central Kentucky Network for)
911/E911 Service to Public Safety Answering)
Points)

No. 2015-00227

**AT&T KENTUCKY’S FIRST SET OF
DISCOVERY REQUESTS TO LFUCG**

BellSouth Telecommunications, LLC d/b/a AT&T Kentucky hereby serves it first set of discovery requests on Lexington-Fayette Urban County Government (“LFUCG”). Please provide all responses according to the schedule in this case.

INSTRUCTIONS

1. In answering these requests, please restate each request in full before stating your response thereto.
2. In answering these requests, furnish all information available to you or subject to your reasonable inquiry, including but not limited to information in the possession of your attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, and anyone else otherwise subject to your control.
3. If a request cannot be responded to in full, respond to the extent possible, specify the reason for your inability to respond to the remainder, and produce all documents regarding the responded-to portion.
4. If you contend that any part of your response to a particular request contains trade secrets, other proprietary or confidential business or personal information, such contention shall not provide a basis for refusing to respond within the time required by the applicable discovery rule(s).

5. For each response to a request or portion thereof is withheld under a claim of privilege, provide a statement identifying: (a) the subject matter of the privileged information; (b) the privilege or immunity claimed and the facts giving rise thereto; and (c) if the privilege or immunity pertains to communications, the date and place of those communications as well as any and all participants in those communications.

6. If any request is objected to on grounds other than privilege or immunity, state in detail the basis for the objection.

7. The present tense includes the past and future tenses.

8. The use of the singular form of any word includes the plural and vice-versa.

9. Each of these requests shall be construed independently and shall not be limited by any other request.

10. The connectors “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside of its scope.

11. The adjectives “any” and “all” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside of its scope.

DISCOVERY REQUESTS

1. Mr. Stack's testimony, at page 6 lines 25 through 27, states that "CKN has not asked AT&T Kentucky to connect to its Selective Router. Instead, several counties that joined the network have sent written requests to AT&T Kentucky requesting new trunking to the CKN Selective Router." Did CKN or its consultants advise the PSAPs joining the CKN network what to request of AT&T Kentucky in terms of new trunking and where to connect that trunking to the CKN network? If the answer is yes, when did CKN or its consultants advise the PSAPs joining the CKN network what to request of AT&T Kentucky in terms of new trunking and where to connect that trunking to the CKN network? Please provide all documentation between CKN or its consultants and the PSAPs in support of your answer.
2. CKN and Windstream made a network diagram available to the parties, including AT&T Kentucky, attending the informal conference held at the KPSC on February 12, 2014. The diagram was titled "CKy911net Partnership between LFUCG, Windstream and AK Associates to provide NG911 Hosting Solution." CKN provided an updated version of the diagram to AT&T Kentucky on April 9, 2014. Did CKN use this diagram to describe that it wanted AT&T Kentucky to connect trunks from AT&T Kentucky's central office or tandem, not a Selective Router, and terminate them on CKN's Selective Router?
3. Is the diagram labeled "Central Kentucky 911 Network" and attached to Robert Stack's 5/19/16 testimony as Exhibit LFUCG 1 a different proposed arrangement/alternative to the one advanced by CKN in 2014, whereby CKN and its member PSAPs now request that AT&T Kentucky route its end-user 911 traffic to the member PSAPs? If so, please explain the difference.
4. In Exhibit LFUCG 1, the first paragraph/note of the narrative states: "New AT&T CAMA Trk's for landline will be transferred to a Media Gateway and pointed to the CKy911Net CPE."
 - a. AT&T Kentucky assumes "Trk's" to mean Trunks. If "Trk's" means something different, please identify what is meant by "Trk's".
 - 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.
 - 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 PSAP that is transitioning to CKN, it is AT&T's understanding that the transitioning PSAP would order 911 service from AT&T Kentucky pursuant to AT&T Kentucky's tariff so that

AT&T Kentucky end-user 911 calls can route to the PSAP's Media Gateway via newly established CAMA trunks. Is AT&T Kentucky's understanding consistent with the understanding of LFUCG and the PSAPs? If not, please explain why not.

- d. Is the proposed Media Gateway provided and provisioned by either CKN or the PSAP? If not, who would provide and provision the proposed Media Gateway?
 - e. It is AT&T Kentucky's understanding that CKN or the PSAP, not AT&T Kentucky, would take the AT&T CAMA trunks from AT&T Kentucky's demarcation point and terminate the trunks to the proposed Media Gateway. Is AT&T Kentucky's understanding consistent with LFUCG's? If not, please explain why not.
5. In Exhibit LFUCG 1, the second paragraph/note of the narrative states: "A Controller In-Bound Call Policy will be established, for each trunk, pointing the traffic back to the PSAP's Guardian ER Ring Group."
- a. It is AT&T Kentucky's position that the second paragraph/note should specifically state: "A Controller In-Bound Call Policy will be established **by CKN**, for each trunk, pointing the traffic back to the PSAP's Guardian ER Ring Group," as it is AT&T Kentucky's position that the responsible party (in this instance CKN) must be clearly delineated. Is AT&T Kentucky's position consistent with LFUCG's? If not, please explain why not.
6. In Exhibit LFUCG 1, the third paragraph/note of the narrative states: "Only AT&T Tandem Transfers (Star Codes) will be allowed, not CKy911Net Tandem Transfers, and remain the responsibility of AT&T for Tandem Transfers."
- a. It is AT&T Kentucky's position that the parties should make clear that AT&T Kentucky will make no changes to the features and functionality (speed dials, etc.) of the existing AT&T Kentucky tandem trunks, and that any request for changes must come from the local PSAP (e.g., Laurel County). Is AT&T Kentucky's position consistent with LFUCG's? If not, please explain why not.
 - b. It is also AT&T Kentucky's position that it will bill the local PSAP for all services it performs for the PSAP (e.g., ANI and Selective Routing). Is AT&T Kentucky's understanding/position consistent with LFUCG's? If not, please explain why not.
7. In Exhibit LFUCG 1, the fifth paragraph/note of the narrative states: "The cost of the individual 911 CAMA trunks would be the responsibility of each PSAP needing such and would agree to said additional cost."
- a. It is AT&T Kentucky's understanding that for AT&T Kentucky ILEC landline customers, AT&T Kentucky would, pursuant to its tariff, bill the PSAP for ANI and Selective Routing, per thousand AT&T Kentucky ILEC access lines. Therefore, AT&T Kentucky proposes that the fifth paragraph/note read: "For AT&T ILEC landline customers, AT&T Kentucky will bill the PSAP for ANI and Selective

Routing, per thousand AT&T ILEC access lines.” Is AT&T Kentucky’s understanding consistent with LFUCG’s? If not, please explain why not.

8. AT&T Kentucky proposes that for purposes of clarity, there be inserted a dotted line in Exhibit LFUCG 1 to clearly delineate the responsibilities of AT&T Kentucky vs. CKN or the PSAP, and that the dotted line start at the top to the right of the AT&T Kentucky SR and go down to the right of the AT&T Kentucky demarc for 9-1-1 CAMA trunks such that the AT&T Kentucky Landline Customer, AT&T Kentucky SR and AT&T Kentucky DeMarc 911 CAMA’s are positioned to the left of this dotted line to reflect AT&T Kentucky’s area of responsibility. Does LFUCG agree with AT&T Kentucky’s recommendation? If not, please explain why not.
9. In Exhibit LFUCG 1, the diagram depicts “Carrier T-1’s” between an ISPR and a building.
 - a. Is the “ISPR” a CKN selective router? If not, what is the ISPR?
 - b. What are the “Carrier T-1’s” and are any of those AT&T Kentucky T-1’s or do they contain AT&T Kentucky trunks from an AT&T Kentucky switch (AT&T Kentucky end office or 911 Tandem/Selective Router)?
10. Regarding the issue of trouble shooting in relation to Mr. Stack’s 5/19/16 testimony and Exhibit LFUCG 1, it is AT&T Kentucky’s understanding that AT&T Kentucky will test to its existing AT&T 9-1-1 CAMA trunk demarc, and that CKN or the PSAP will then do any necessary testing beyond that point. Is AT&T Kentucky’s understanding consistent with LFUCG’s? If not, please explain why not.
11. Per Mr. Stack’s 5/19/16 testimony (on behalf of LFUCG), it is AT&T Kentucky’s understanding that the twenty-five partner members of the Central Kentucky 911 Network with AT&T Kentucky end-users in their PSAP jurisdiction would also request the alternative transport method discussed by Mr. Stack- specifically that AT&T Kentucky would continue to selectively route the call to the proper Public Safety Answering Point (PSAP), where the PSAP has a Media Gateway that is connected to the CKN Controller. Is AT&T Kentucky’s understanding consistent with LUCG’s? If not, please explain why not.

Respectfully submitted,

/s/ Cheryl Winn
Waters Law Group, PLLC
12802 Townepark Way, Suite 200
Louisville, KY 40243
Telephone: (502) 425-2424
Facsimile: (502) 425-9724
crwinn@waterslawgroup.com

FILING NOTICE AND CERTIFICATE

The undersigned hereby certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing was transmitted to the Commission on June 9, 2016; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn