

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LONDON-LAUREL COUNTY COMMUNICATION
CENTER'S INITIAL REQUEST FOR INFORMATION TO AT&T KENTUCKY**

COMES the London-Laurel County Communications Center ("Center"), by counsel and pursuant to the Public Service Commission's Scheduling Order of February 5, 2016 and submits its Initial Request 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 AT&T 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 Center.

(5) To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper, 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 AT&T 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 Center 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 AT&T 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 London-Laurel County Communications Center submits this Initial Request for Information.

Respectfully submitted,


Linda K. Ain

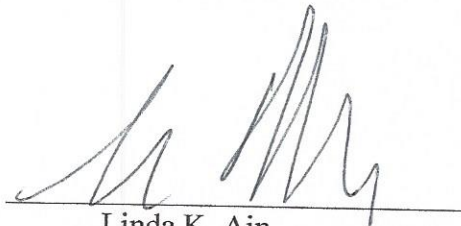
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FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission (which includes a cover letter serving as the required Read1st document) within two business days; that the electronic filing was transmitted to the Commission on March 18, 2016; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

A handwritten signature in black ink, appearing to read 'Linda K. Ain', is written over a horizontal line.

Linda K. Ain
Counsel to the London-Laurel County
Communications Center

**LONDON-LAUREL COUNTY COMMUNICATION
CENTER'S INITIAL REQUEST FOR INFORMATION TO 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.

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.

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

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

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.

ATTACHMENT 1

From: BENNETT, CRAIG A <cb7368@att.com>
Sent: Friday, August 14, 2015 3:36 PM
To: mholt@laurelco911.com
Subject: AT&T 911 information

Mr. Holt,

Through your notice to AT&T, the Laurel County E911 Communication Center PSAP has made known that it wants Central Kentucky Network (CKN) to become involved in handling the 911 calls bound to your PSAP. However, there is no direct connection between AT&T and CKN. Before a direct connection can be put in place, there are two issues that must be resolved. The first is whether CKN must receive a certificate from the Kentucky Public Service Commission before it can participate in the handling of 911 calls. The second is whether CKN must have a Commission-approved agreement with AT&T in order for AT&T to deliver 911 calls to CKN for further handling. Prior commission rulings suggest that the answer to both questions is "yes," and given the important safety implications, we have asked the Commission to give all affected parties guidance.

So that you are aware of these efforts, I am providing you with a courtesy notice of [AT&T's petition to the KY PSC](#) and the subsequent [KY PSC July 31, 2015 order](#) that established a time frame for other parties to intervene and/or file comments in this case. While this case is being considered by the KY PSC, AT&T will continue to deliver its 911 calls to the Laurel County E911 Communication Center PSAP via the same arrangements we have in place today.

Thank you,

Craig Bennett

Public Safety Solutions

9-1-1 Consultant Indiana/Kentucky
[AT&T](#)

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