

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF COMPETITIVE CARRIERS OF)	
THE SOUTH, INC. FOR A DECLARATORY ORDER)	CASE NO.
AFFIRMING THAT THE INTERCONNECTION)	2015-00283
REGIMES UNDER KRS 278.530 AND 47 U.S.C. § 251)	
ARE TECHNOLOGICALLY NEUTRAL)	

RESPONSE OF COMPETITIVE CARRIERS OF THE SOUTH, INC.
TO THE FIRST SET OF INFORMATION REQUESTS FROM
MCIMETRO ACCESS TRANSMISSION SERVICES LLC D/B/A
VERIZON ACCESS TRANSMISSION SERVICES

September 9, 2016

GENERAL OBJECTION

Without waiving any additional objections which might be asserted herein, Competitive Carriers of the South, Inc. (“CompSouth”) objects to the First Set of Information Requests (“Requests”) from MCIMetro Access Transmission Services, LLC D/B/A Verizon Access Transmission Services (“Verizon”) on the basis that the Requests are directed to CompSouth’s members, who are not parties to this proceeding. Accordingly, the Requests are misdirected and not relevant. Moreover, the subject matter of the requests relate to specific commercial agreements entered into by CompSouth’s members and, therefore, are not relevant or germane to the legal issues presented in this declaratory request. By virtue of the fact that CompSouth’s members are not parties to this proceeding, they cannot be compelled to provide information relating to specific commercial agreements that are irrelevant to the proceeding. Counsel also objects to certain specific Requests on the grounds set forth below.



Counsel for Competitive Carriers of the South, Inc.

PUBLIC VERSION

REQUEST VZ 1-1 Please identify, by title, effective date and the names of all parties, each agreement that each CompSouth member has entered into with a service provider other than an affiliate of yours concerning, providing for or governing the exchange in IP format of voice traffic going from you to the other party as well as voice traffic coming from the other party to you.

**RESPONDING
WITNESS:** Carolyn Ridley

**SPECIFIC
OBJECTION:** On behalf of CompSouth, counsel objects to the Request to the extent that it calls for the identification of specific counterparties to any agreements identified herein. Such information is confidential and proprietary and has no relevance whatsoever to the issues of this proceeding.

RESPONSE: Subject to, and without waiving, the General Objection and Specific Objection noted by counsel, which are incorporated herein by reference, CompSouth's participating members have voluntarily identified to CompSouth the following agreements which are within the scope of Request VZ 1-1:

Birch Communications, Inc. – **CONFIDENTIAL**

Level 3 Communications, LLC – **CONFIDENTIAL**

Windstream Communications, Inc. – **CONFIDENTIAL**

PUBLIC VERSION

REQUEST VZ 1-2 Please produce all agreements identified in response to VZ 1-1, including all attachments, exhibits and schedules.

RESPONDING
WITNESS: Carolyn Ridley

SPECIFIC
OBJECTION: On behalf of CompSouth, counsel objects to the Request to the extent that it calls for the disclosure of the identity of specific counterparties to any agreements identified herein. Such information is confidential and proprietary and has no relevance whatsoever to the issues of this proceeding.

RESPONSE: Subject to, and without waiving, the General Objection and Specific Objection noted by counsel, which are incorporated herein by reference, CompSouth's participating members are voluntarily providing the agreements identified in Response VZ 1-1.

Birch Communications, Inc. – **CONFIDENTIAL**

Level 3 Communications, LLC – **CONFIDENTIAL**

Windstream Communications, Inc. – **CONFIDENTIAL**

PUBLIC VERSION

REQUEST VZ 1-3 What percentage of each CompSouth member's retail customers subscribe to VoIP service from you? Please answer separately for each of your affiliates that have retail customers.

**RESPONDING
WITNESS:**

Carolyn Ridley

RESPONSE:

Subject to the General Objection noted by counsel, which is incorporated herein by reference, CompSouth's participating members are voluntarily providing information in response to this request as follows:

Birch Communications, Inc. – **CONFIDENTIAL**

Level 3 Communications, LLC – **CONFIDENTIAL**

Windstream Communications, Inc. – **CONFIDENTIAL**

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BEFORE THE PUBLIC SERVICE COMMISSION

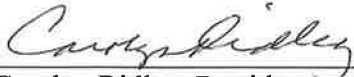
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VERIFICATION OF CAROLYN RIDLEY


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF WARREN)

Comes now Carolyn Ridley, President of Competitive Carriers of the South, Inc. (“CompSouth”), and after being duly sworn, states that she has read the foregoing Response to the First Set of Information Requests propounded by MCImetro Access Transmission Services LLC. d/b/a Verizon Access Transmission Services, and that the information contained therein is a true and correct copy of the information provided to her by the participating members of CompSouth, after reasonable inquiry, and, therefore, the things set forth therein are true and correct to the best of her knowledge, information and belief as of the day set forth below.



Carolyn Ridley, President
Competitive Carriers of the South, Inc.

The foregoing Verification was signed, acknowledged and sworn to before me this 8th
day of September, 2016, by Carolyn Ridley in her capacity as President of Competitive Carriers
of the South, Inc.



NOTARY PUBLIC

Notary # 516834

Commission expiration: 8-12-2018