

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)	

**COMPETITIVE CARRIERS OF THE SOUTH, INC'S
INFORMATION REQUESTS TO AT&T KENTUCKY**

AT&T Kentucky, pursuant to the Order dated August 9, 2016 which set the Procedural Schedule in the above-styled case is requested to file responses to the following requests for information by November 23, 2016, with copies to the Commission and to all parties of record, and in accordance with the following:

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.
2. If any request appears confusing, please request clarification directly from Competitive Carriers of the South, Inc. ("CompSouth").
3. The responses provided should first restate the question asked and also identify the person(s) supplying the information.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any information request, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. These requests shall be deemed continuing so as to require further and supplemental responses if AT&T Kentucky receives or generates additional information within the scope of these requests between the time of the original responses and the end of any hearings in this proceeding.

6. To the extent that the specific document, workpaper or information does not exist as requested, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

7. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

8. If you object to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify CompSouth as soon as possible.

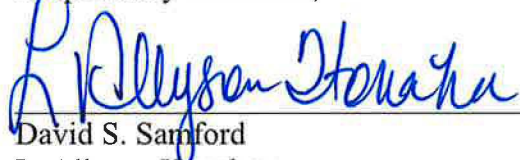
9. For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

10. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, recordings, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including

computerized memory or magnetic media. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), code number thereof, or other means of identifying it and its present location and custodian. If any such document was, but is no longer in your possession or subject to your control, state what disposition was made of it, including the date of such disposition.

11. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any information request who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.

Respectfully submitted,



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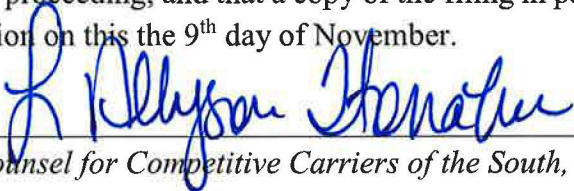
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Counsel for Competitive Carriers of the South, Inc.

CERTIFICATE OF SERVICE

This is to certify that foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on November 9, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission on this the 9th day of November.



Counsel for Competitive Carriers of the South, Inc.

INFORMATION REQUESTS

REQUEST 1. On page 5, AT&T Kentucky witness McPhee indicates that AT&T Kentucky's position is that neither Kentucky law nor the FTA apply to interconnection in IP format, but then indicates that AT&T Kentucky takes no position in this proceeding. Does AT&T Kentucky concede that CLECs may request IP interconnection under 47 U.S.C. §§ 251-252 and KRS 278.530?

REQUEST 2. What would be AT&T Kentucky's response to a request for IP interconnection under section 47 U.S.C. §§ 251-252?

REQUEST 3. Please identify by title, effective date and the names of all parties, each agreement that AT&T Kentucky or its affiliates has entered into with a service provider, including any affiliate of AT&T Kentucky concerning, providing for or governing the exchange in IP format of voice traffic going from AT&T Kentucky to the other party as well as voice traffic coming from the other party to AT&T Kentucky.

a. Please produce all agreements identified in the response above, including all attachments, exhibits and schedules.

b. Please confirm whether AT&T Kentucky has submitted any of these negotiated agreements for the exchange of IP Voice traffic to the Kentucky Public Service Commission so it can determine if it is an ICA pursuant to 47 U.S.C. §§ 251-252 and therefore available for opt-in.

REQUEST 4. Please identify by title, effective date and the names of all parties, each commercial negotiation that AT&T Kentucky or its affiliates has either proposed in writing to commence or entered into with a service provider, including any affiliate of AT&T Kentucky concerning, providing for or governing the exchange in IP format of voice traffic going from

AT&T Kentucky to the other party as well as voice traffic coming from the other party to AT&T Kentucky.

a. Please produce all agreements identified in the response above, including all attachments, exhibits and schedules.

REQUEST 5. Please provide a copy of all IP interconnection agreements referred to by AT&T Kentucky witness Frank Simone before the South Carolina Public Service Commission, Proceeding #16-11511, January 12, 2016, Tr. 42.

REQUEST 6. To the extent that any of the terms, conditions and/or prices vary among the agreements in (5) above, were any or all of the carriers offered the opportunity to opt-into a preexisting agreement?

REQUEST 7. Did AT&T Kentucky provide each of the carriers that have requested IP interconnection copies of its preexisting agreements with other carriers?

REQUEST 8. For each commercial negotiation that AT&T Kentucky or its affiliates has either proposed in writing to commence or entered into with a service provider, including any affiliate of AT&T Kentucky concerning, providing for or governing the exchange in IP format of voice traffic going from AT&T Kentucky to the other party as well as voice traffic coming from the other party to AT&T Kentucky, please state whether AT&T Kentucky or its affiliates required its affiliate or the service provider to agree that the final agreement contain the provision that it not be subject to 47 U.S.C. §§ 251-252 or that the final agreement be executed as a commercial agreement.

REQUEST 9. Does AT&T mandate the signing of a non-disclosure agreement in order to negotiate an IP-to-IP interconnection agreement for the exchange of voice traffic?

REQUEST 10. AT&T Kentucky asserts that interconnection is available under KRS 278.530 only when the carrier requesting interconnection has no existing contract or interconnection agreement. Is it AT&T Kentucky's position that the existence of a TDM interconnection agreement forecloses a carrier from requesting IP interconnection under KRS 278.530?

REQUEST 11. Does AT&T Kentucky concede that the PSC could determine the applicability of 47 U.S.C. §§ 251-252 to IP interconnection in the context of an arbitration request? If not, why not?

REQUEST 12. Does AT&T Kentucky have a target date to migrate customers in Kentucky to IP services?

REQUEST 13. Does AT&T Kentucky agree to continue to provide TDM-based interconnection, even after a majority of its customers have migrated to IP-based services? Does AT&T Kentucky agree to continue to provide TDM-based interconnection, even after all of its customers have migrated to IP-based services?

REQUEST 14. Please provide for year-end 2012, 2013, 2014, 2015 (and update when 2016 data becomes available) the number of switched access lines and facilities-based VoIP lines in Kentucky, separately for residential and business customers.

REQUEST 15. Provide AT&T Kentucky's Form 477 response to the FCC for 2012, 2013, 2014 and 2015 for Kentucky identifying the number of voice lines and VoIP subscriptions, aggregated for the state of Kentucky.

REQUEST 16. For a call that originates in TDM and terminates in TDM, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

REQUEST 17. For a call that originates in VoIP and terminates in VoIP, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

REQUEST 18. For a call that originates in TDM and terminates in VoIP, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

REQUEST 19. For a call that originates in VoIP and terminates in TDM, please identify how the exchange of traffic at the point of interconnection in IP format provides enhanced functionality to end users solely as a result of the use of IP format at the point of interconnection.

REQUEST 20. Do the existing ICAs that AT&T Kentucky has with Birch, Level 3 and Windstream (“the CompSouth members”) allow the CompSouth members to exchange IP Voice traffic in IP format from end to end?

REQUEST 21. Please quantify the cost and time for both internal and external resources that Michigan Bell Telephone Company d/b/a AT&T Michigan expended to adjudicate the Michigan Case No. U-17349 – *In the Matter of the Petition of Sprint Spectrum, L.P. for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish Interconnection Agreements with Michigan Bell Telephone Company d/b/a AT&T Michigan.*

REQUEST 22. Please quantify the cost and time for both internal and external resources that Illinois Bell Telephone Company d/b/a AT&T Illinois expended to adjudicate the Docket 12-0550, *SprintCom, Inc. et.al. Petition of Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Illinois Bell Telephone Company.*