

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:

Brandenburg Telephone Company; Duo County)
Telephone Cooperative Corporation, Inc.; Highland)
Telephone Cooperative, Inc., Mountain Rural)
Telephone Cooperative Corporation, Inc.; North)
Central Telephone Cooperative Corporation; South)
Central Rural Telephone Cooperative Corporation, Inc.)
And West Kentucky Rural Telephone Cooperative)
Corporation, Inc.)
)
Complainants) Case No.
) 2007-00004
)
v.)
)
Windstream Kentucky East, Inc.; and)
Windstream Kentucky West, Inc.)
)
)
Defendants)

WINDSTREAM KENTUCKY EAST, LLC'S DATA REQUESTS TO INTERVENORS

Windstream Kentucky East, LLC ("Windstream East") submits the following Data Requests to Sprint Communications Company L.P., Sprint Spectrum, L.P., SprintCom, Inc. d/b/a Sprint PCS, Nextel West Corp., Inc., and NPCR, Inc., d/b/a Nextel Partners, NuVox Communications, Inc., T-Mobile USA, Inc., Powertel-Memphis, Inc., T-Mobile Central LLC, and TW Telecom of KY LLC (collectively, "Intervenors") to be answered individually by each Intervenor in accord with the following:

DEFINITIONS

- “Windstream East” means Windstream Kentucky East, LLC.
- “You” and “your” refer to Intervenors, individually or collectively, as well as any predecessors in interest, parent(s), subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting on behalf of Intervenors.
- “Intervenors” means, individually or collectively depending on the applicable context, Sprint Communications Company L.P., Sprint Spectrum, L.P., SprintCom, Inc. d/b/a Sprint PCS, Nextel West Corp., Inc., and NPCR, Inc., d/b/a Nextel Partners, NuVox Communications, Inc., T-Mobile USA, Inc., Powertel-Memphis, Inc., T-Mobile Central LLC, and TW Telecom of KY LLC and its or their subsidiaries, affiliates, present and former officers, employees, agents, directors, and all other persons acting or purporting to act on Intervenors' behalf.
- “Affiliate” as defined in Section 3 of the Federal Telecommunications Act of 1996 (“the Act”) means “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.” (47 U.S.C. §153(1).)
- “Document” shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in your full or partial possession, custody or control, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files and copies of such writings or

records containing any commentary or notation whatsoever that does not appear in the original.

- “Referring” or “relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- “And” and “or” as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction shall serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.
- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by these discovery requests, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:
 - a. the type of document (*e.g.*, letter, memorandum, etc.);
 - b. the date of the document;
 - c. the title or label of the document;
 - d. the identity of the document originator;
 - e. the identity of each person to whom the document was sent;
 - f. a summary of the contents of the document; and
 - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

These discovery requests are to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documentation may be obtained.

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.

If any request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully. If any request appears confusing, please request clarification directly from counsel for Windstream East.

These requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known.

For each request, provide the name of your witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

Interrogatories

INTERROGATORY NO. 1: Please identify in detail all agreements and arrangements, whether written or verbal, formal or informal, between you and any other carrier (including any of your Affiliates) to provide for the provision or receipt of transit traffic.

INTERROGATORY NO. 2: With respect to your allegations in this proceeding that Windstream East is not encouraged to negotiate agreements for transit traffic in light of its transit tariff filing, please identify all facts forming the basis of your allegation(s).

INTERROGATORY NO. 3: Please identify in detail all documents between you and any Regional Bell Operating Company ("RBOC") relating to negotiations and execution of a transit traffic agreement between you and the RBOC.

INTERROGATORY NO. 4: Please identify in detail all indirect interconnection arrangements you have with any of your Affiliates or other third parties, including all incumbent local exchange carriers in Kentucky.

INTERROGATORY NO. 5: Please describe with specificity all facts relating to any injury you allege to have sustained as a result of the filing of Windstream East's transit tariff.

INTERROGATORY NO. 6: Please describe in detail the dates on which and circumstances under which you have ever been denied transit traffic service from Windstream East since 2002.

INTERROGATORY NO. 7: Please describe and provide all evidence and other facts, you have compiled with respect to the rates contained in Windstream East's transit tariff, including any comparisons, cost study analyses, consultant opinions, and other such documents that will form the basis for your testimony in this matter.

INTERROGATORY NO. 8: Please identify with specificity all agreements you have with any third party wireless or competitive local exchange carrier providing for indirect interconnection.

INTERROGATORY NO. 9: With respect to the agreements referenced in Interrogatory No. 8 above and your response thereto, please identify all rates included in those agreements that were established pursuant to TELRIC methodologies.

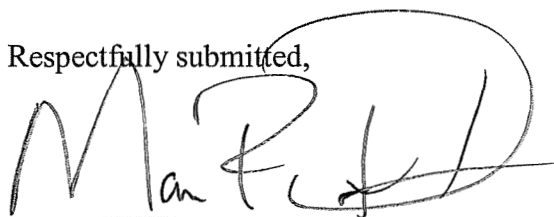
INTERROGATORY NO. 10: Please identify all documents pertaining to any request by you to any of the Complainants in this matter relating to indirect interconnection.

INTERROGATORY NO. 11: With respect to Interrogatory No. 10 above and your response thereto, please describe the nature and scope of your request and the nature of the response received from the Complainant(s).

Request for Production

RFP NO. 1: Please produce copies of all documents referenced in the foregoing Interrogatories and your responses thereto or otherwise relied upon by you to formulate your responses to the Interrogatories, including but in no way limited to transit traffic agreements, documents regarding your alleged injuries, your cost study analyses, and consultant opinions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line.

Mark R. Overstreet, Esq.
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634

COUNSEL FOR WINDSTREAM
KENTCUKY EAST, LLC

CERTIFICATE OF SERVICE

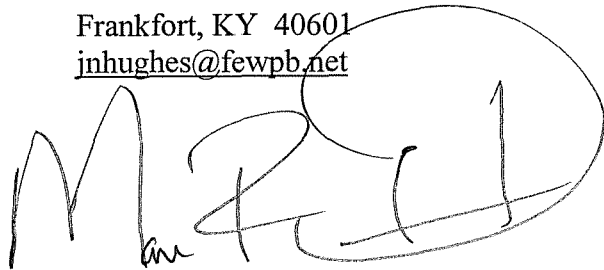
I hereby certify that a copy of the foregoing was served by electronic mail and United States First Class Mail, postage prepaid, on this 19th day of February, 2009 upon:

John E. Selent
Edward T. Depp
Holly C. Wallace
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
SELENT@DINSLAW.com
tip.depp@dinslaw.com
HWALLACE@DINSLAW.com

Douglas F. Brent
Kendrick R. Riggs
C. Kent Hatfield
Stoll, Keenon & Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
Douglas.Brent@skofirm.com

Dennis G. Howard, II, Esq.
Kentucky Attorney General's Office
Suite 200
1024 Capital Center Drive
Frankfort, KY 40601
dennis.howard@ag.ky.gov

John N. Hughes
124 W Todd Street
Frankfort, KY 40601
jnhughes@fewpb.net

A handwritten signature in black ink, appearing to read "Mark R. Overstreet", is written over a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet