

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE 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)

v.)

Windstream Kentucky East, Inc.)

Defendant)

Case No. 2007-00004

RECEIVED

MAR 20 2009

PUBLIC SERVICE
COMMISSION

WINDSTREAM KENTUCKY EAST, LLC'S RESPONSES TO COMMISSION STAFF'S
REQUEST

Windstream Kentucky East, LLC ("Windstream East") submits the following Responses
to the Request propounded by Commission Staff:

REQUEST NO. 1: What rates are in Windstream's current interconnection agreements for tandem transit traffic services and end-office transit traffic service? If multiple rates are used, provide all rates.

RESPONSE: Windstream East's interconnection agreements are publicly on file with the Commission, and none provides for end-office transit traffic service. Attached is a table showing the applicable contract tandem transit rate for each of Windstream East's interconnection agreements.

Windstream East Representative Supporting Response: Kerry Smith

Carrier	Type	Rate
Alaska Native Broadband (Cricket Communications)	Wireless	\$ 0.0030000
ALLTEL Communications, Inc.	Wireless	\$ 0.0030000
Appalachian Cellular	Wireless	\$ 0.0014000
AT&T Wireless Services, Inc.	Wireless	\$ 0.0014000
Bellsouth Mobility/Cingular Wireless Inc.	Wireless	\$ 0.0014000
Bluegrass Cellular, Inc.	Wireless	\$ 0.0014000
Cellular Information Systems of Florence, Inc.	Wireless	\$ 0.0014000
Nextel West Corp.	Wireless	\$ 0.0014000
NPCR	Wireless	\$ 0.0014000
Ramcell	Wireless	\$ 0.0014000
Sprint Spectrum LP	Wireless	\$ 0.0030000
Telecorp Communications, Inc.	Wireless	\$ 0.0014000
Tritel Communications, Inc.	Wireless	\$ 0.0014000
Verizon Wireless	Wireless	\$ 0.0030000
VoiceStream	Wireless	\$ 0.0014000
West Virginia PCS Alliance, L.C., d/b/a NTELOS	Wireless	\$ 0.0014000
1-800-Reconex, Inc.	CLEC	\$ 0.0009680
Access Integrated Networks, Inc. d/b/a Birch Communicat	CLEC	\$ 0.0030000
Aero Communications, LLC	CLEC	\$ 0.0009680
ALEC, Inc	CLEC	\$ 0.0030000
Armstrong Telecommunications, Inc.	CLEC	\$ 0.0030000
AT&T Communications of the S. Central States, Inc.	CLEC	\$ 0.0008209
Bell South Long Distance	CLEC	\$ 0.0030000
Big River Telephone Company, LLC	CLEC	\$ 0.0008209
Bluegrass Telephone Company, Inc. d/b/a Kentucky Telep	CLEC	\$ 0.0030000
Bluestar Network, Inc.	CLEC	\$ 0.0008209
Brandenburg Telecom LLC	CLEC	\$ 0.0009680
BTI Business Telecom , Inc.	CLEC	\$ 0.0009680
Cinergy Communications, Inc.	CLEC	\$ 0.0030000
Comcast Phone of Kentucky, LLC	CLEC	\$ 0.0030000
Cumberland Cellular, Inc. d/b/a Duo County Telecom	CLEC	\$ 0.0009680
DSLNET Communications, LLC	CLEC	\$ 0.0037739
FiberNet LLC	CLEC	\$ 0.0030000
First Choice Technologies, Inc.	CLEC	\$ 0.0008209
Gulf Coast Communications, Inc.	CLEC	\$ 0.0042693
Insight Phone of Kentucky, LLC	CLEC	\$ 0.0030000
Inter-Mountain Cable	CLEC	\$ 0.0009680
Kentucky Christian College	CLEC	\$ 0.0013321
KMC Telecom IV, Inc.	CLEC	\$ 0.0008209
Louisville Lightwave/DBA Telcove	CLEC	\$ 0.0015633
Momentum Telecom, Inc.	CLEC	\$ 0.0030000
Navigator Telecommunications, LLC	CLEC	\$ 0.0013321
New Edge Network, Inc.	CLEC	\$ 0.0037739
North Central Communications, Inc.	CLEC	\$ 0.0009680
NuVox Communications, Inc.	CLEC	\$ 0.0009680
Serenity, Inc. d/ba/ Five D's Communications	CLEC	\$ 0.0030000
South Central Telecom, LLC	CLEC	\$ 0.0009680

SouthEast Telephone, Inc.	CLEC	\$ 0.0030000
Sprint Communications Company L.P.	CLEC	\$ 0.0030000
TCG Ohio	CLEC	\$ 0.0008209
Terablue, Inc.	CLEC	\$ 0.0030000
Touchtone Communications, Inc./Gietel, Inc.	CLEC	\$ 0.0013321
TV Service, Inc.	CLEC	\$ 0.0009680
TW Telecom	CLEC	\$ 0.0020000
University Telcom, Inc	CLEC	\$ 0.0009680
University Telcom, Inc.	CLEC	\$ 0.0009680
US LEC of Tennessee Inc.	CLEC	\$ 0.0048320
Verizon Advance Data	CLEC	\$ 0.0013321
Verizon Business	CLEC	\$ 0.0030000

REQUEST NO. 2: Does Windstream have any contracts that use bill-and-keep arrangements for transit traffic?

RESPONSE: No.

Windstream East Representative Supporting Response: Kerry Smith

REQUEST NO. 3: For the following questions, refer to the cost support study submitted on December 4, 2007.

- a. Was the total element long run incremental cost ("TELRIC") methodology used to prepare the study? If not, what methodology was used?
- b. When was the study prepared? What time period was used to compile the data in the study?

RESPONSE: (a) Windstream East's Transit Traffic Tariff rates were developed using forward-looking (or, TELRIC), and not embedded, costs. (b) The cost study was developed in November 2006 and included 2003 investment data for forward-looking investment dollars, 2005 financial information for annual charge factors, 2003 vendor prices for cost of tandem switches, and 2003 demand minutes of use. Year 2000 local minutes was a frozen factor used in the cost study.

Windstream East Representative Supporting Response: Kerry Smith

REQUEST NO. 4: This question refers to any carrier in Kentucky, including the complaining carriers in this matter. Has Windstream been paid by any carrier for traffic billed under the transit traffic tariff? If so, provide a summary of the charges and carriers that have been billed.

RESPONSE: Yes. For customer proprietary reasons, Windstream East refers to "Carrier X" to note that an incumbent local exchange carrier in Kentucky, which is not affiliated with Windstream East and is not a party to this proceeding, has utilized tandem transit service under Windstream East's tariff. Carrier X is current in its payments, and as of February 5, 2009 Carrier X has a current balance of \$831.29 (representing current billing and no past-due balance).

Windstream East Representative Supporting Response: Kerry Smith

REQUEST NO. 5: This question refers to any carrier in Kentucky, including the complaining carriers in this matter. Does Windstream have any unpaid bills issued to carriers for traffic billed under the transit traffic tariff/ If so, provide a summary of the charges and companies billed.

RESPONSE: Windstream East calculates the RLEC outstanding balances as February 5, 2009 to be as follows: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Because of the customer proprietary nature of these balances, Windstream East is serving unredacted copies of this response only on Commission Staff.

Windstream East Representative Supporting Response: Kerry Smith

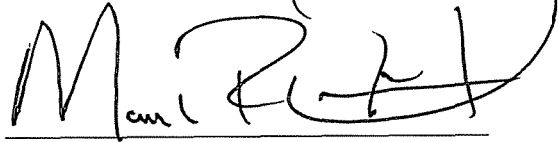
REQUEST NO. 6: Has Windstream entered into any interconnection agreements with any of the complaining carriers in this matter wherein the rates of transit traffic service and end-office transit traffic service are outlined? If so, provide a list of those agreements and the date on which each was submitted to the Commission.

RESPONSE: No, as of the date of this Response. (To confirm, for purposes of its Response, Windstream East has assumed that "complaining carriers" refers to the RLEC Complainants. The interconnection agreements identified in Windstream East's Response to Data Request No. 1 above includes any interconnection agreements with Intervenors.)

Windstream East Representative Supporting Response: Kerry Smith

This 20th day of March, 2009.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet". The signature is written in a cursive style with a large, circular flourish at the end. A horizontal line is drawn below the signature.

Mark R. Overstreet, Esq.
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COUNSEL FOR WINDSTREAM
KENTUCKY EAST, LLC

CERTIFICATE OF SERVICE

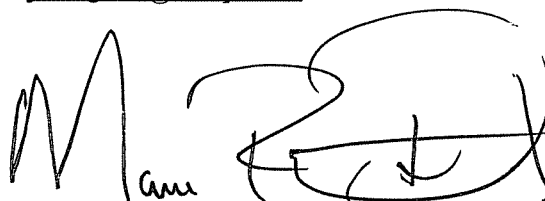
I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 20th day of March, 2009 upon:

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

Mark R. Overstreet