

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

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MAR 20 2009

PUBLIC SERVICE  
COMMISSION

WINDSTREAM KENTUCKY EAST, LLC'S  
RESPONSES TO INTERVENORS' REQUEST FOR INFORMATION

Windstream Kentucky East, LLC ("Windstream East") submits the following Responses to the Request for Information propounded by NuVox Communications, Inc., T-Mobile USA, Inc., Powertel/Memphis, Inc., T-Mobile Central LLC, and tw telecom of ky llc, (collectively, "Intervenors").

As a general matter, Intervenors' instructions stated, "When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations." Windstream East objects to this instruction to the extent it refers to entities operating in states outside Kentucky and this Commission's jurisdiction.

1. With respect to the cost study included as Appendix A to Windstream's Motion for Confidential Treatment filed December 4, 2007, does the cost study include embedded costs?

**RESPONSE TO INTERVENOR NO. 1:** Windstream East's cost study used forward-looking, and not embedded, costs. The unredacted copy of this Response is being provided to, and shall be disclosed only to, those persons who have executed a non-disclosure agreement.

Windstream East Representative Supporting Response: Kerry Smith

2. Please identify each person responsible for creation of the cost study, including their employer and job title.

**RESPONSE TO INTERVENOR NO. 2:** Tom Rigor (Windstream Manager - Wholesale Services) created the cost study, which was reviewed by Kerry Smith (Windstream Staff Manager - Wholesale Services).

Windstream East Representative Supporting Response: Kerry Smith

3. Please admit that Windstream is obligated to provide transit service to Intervenors at rates based on forward-looking economic costs as determined by the methodology set forth in §§ 51.505 and 51.511 of the Federal Communications Commission's rules, 47 C.F.R. §§ 51.505 and 51.511.

**RESPONSE TO INTERVENOR NO. 3:** Windstream East objects that this compound question is an improper request for admission. Further, Windstream East objects to the extent this question seeks a legal position. If Windstream East promulgates a legal argument on this issue, its attorneys will do so in the post hearing briefs.

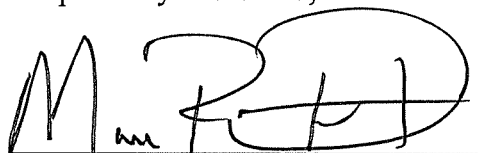
Windstream East Representative Supporting Response: Kerry Smith, except as to legal issues to be briefed by the parties' attorneys

4. Please provide a copy of the cost study.

**RESPONSE TO INTERVENOR NO. 4:** A copy of the confidential cost study in .pdf format was provided on March 11, 2009 to the counsel and consultant for Intervenors following their execution of a nondisclosure agreement. A copy of the confidential cost study in Excel format is attached hereto and is being provided only to the two Intervenor representatives identified above who have executed the nondisclosure agreement.

Windstream East Representative Supporting Response: Kerry Smith

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, prominent "R" and "O".

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Mark R. Overstreet, Esq.  
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COUNSEL FOR WINDSTREAM  
KENTCUKY 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 20<sup>th</sup> day of March, 2009 upon:

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A handwritten signature in black ink, appearing to read 'MRD', with a horizontal line underneath it.

Mark R. Overstreet