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May 5, 2009

RECEIVED
MAY 08 2009
PUBLIC SERVICE
COMMISSION

Mr. Jeff DeRouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

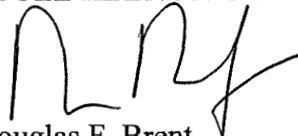
RE: 2007-00004—Rural Local Carriers v. Windstream KY East

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Intervenors' Second Set of Requests for Information to Windstream Kentucky East, LLC. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely yours,

STOLL KEENON OGDEN, PLLC


Douglas F. Brent

Enc.

105165.116519/565155.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION RECEIVED

MAY 08 2009

In the Matter of:

PUBLIC SERVICE COMMISSION

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 Telephone Cooperative Corporation, Inc.; and West Kentucky Rural Telephone Cooperative Corporation, Inc.

Complainants

v.

Windstream Kentucky East, LLC

Defendants

CASE NO. 2007-00004

SECOND REQUEST FOR INFORMATION

NuVox Communications, Inc., T-Mobile USA, Inc., Powertel/Memphis, Inc., T-Mobile Central LLC and tw telecom of ky llc, (hereinafter collectively "Intervenors") propound the following requests for information to Windstream Kentucky East, LLC ("Windstream").

INSTRUCTIONS

Each response shall be answered under oath or be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

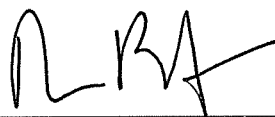
The Defendant shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which the Defendant fails or

refuses to furnish all or part of the requested information, Defendant shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

5. Please provide all supporting documents for the investment inputs to the cost study including but not limited to tandem switch, transport termination, and transport facility investments. Please include all documents related to any and all costs included in the investment inputs as well as any accounting documentation relating to those costs and any documents discussing or characterizing the nature of those costs including but not limited to whether they are accounting investments, embedded costs, forward-looking costs, etc.
6. Please identify (by CLLI) each Windstream switch at which tandem transit service is available under the transit tariff.
7. Please identify (by CLLI) any Windstream switch providing tandem transit service that has been placed in service since 2003.
8. Regarding the cost study calculation in Tab "Rate Sheet," Row 21 labeled "End Office Switching Less 25% NTS," please admit or deny that Windstream's tariffed per minute rates for transit service include non-traffic sensitive costs.
9. With respect to the same cost study calculation, please explain:
 - a) the logic supporting this calculation, including the assumed percentage of 25%;
 - b) whether that percentage captures all or only a portion of non-traffic sensitive end office switching cost; and
 - c) whether "Transit Cost" (Rows 16 through 21) contains any non-traffic sensitive costs.

Respectfully submitted,



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Counsel for NuVox Communications, Inc.,
T-Mobile USA, Inc., Powertel/Memphis, Inc.,
T-Mobile Central LLC and tw telecom of ky llc

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Request for Information has been served by United States Mail on those persons whose names appear below this 5th day of May, 2009.



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