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March 27, 2009

VIA OVERNIGHT MAIL

RECEIVED

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

MAR 30 2009

PUBLIC SERVICE
COMMISSION

Re: MCI Communications, Services, Inc., Bell Atlantic Communications, Inc.,
Nynex Long Distance Company, TTI National, Inc., Teleconnect Long
Distance Services & Systems Company and Verizon Select Services, Inc.,
Complainants v. Windstream Kentucky West, Inc., Windstream Kentucky
East, Inc.-Lexington, and Windstream Kentucky East, Inc.-London,
Defendants
PSC 2007-00503

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are the original and ten (10)
copies of BellSouth Telecommunications, Inc.'s, d/b/a AT&T Kentucky, and AT&T
Communications of the South Central States, LLC's, First Data Requests to Windstream
Kentucky West, Inc., Windstream Kentucky East, Inc. - Lexington, and Windstream
Kentucky East, Inc. - London.

Sincerely,

Mary K. Keyer
General Counsel-KY

cc: Parties of Record

Enclosures

732136

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MCI COMMUNICATIONS SERVICES, INC., BELL)
ATLANTIC COMMUNICATIONS, INC., NYNEX LONG)
DISTANCE COMPANY, TTI NATIONAL, INC.,)
TELECONNECT LONG DISTANCE SERVICES &)
SYSTEMS COMPANY AND VERIZON SELECT)
SERVICES, INC.)

Complainants)

v.)

WINDSTREAM KENTUCKY WEST, INC.,)
WINDSTREAM KENTUCKY EAST, INC. – LEXINGTON)
AND WINDSTREAM KENTUCKY EAST, INC. – LONDON)

Defendants)

CASE NO.
2007-00503

AT&T'S FIRST DATA REQUESTS TO
WINDSTREAM KENTUCKY WEST, INC.,
WINDSTREAM KENTUCKY EAST, INC. – LEXINGTON
AND WINDSTREAM KENTUCKY EAST, INC. – LONDON

BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky ("AT&T Kentucky")
and AT&T Communications of the South Central States, LLC ("AT&T Communications")
(collectively "AT&T"), pursuant to the Order of the Kentucky Public Service Commission
dated March 11, 2009, hereby serves its First Data Requests to Windstream Kentucky
West, Inc., Windstream Kentucky East, Inc. – Lexington and Windstream Kentucky
East, Inc. – London ("Windstream").

INSTRUCTIONS

These data requests are to be answered with reference to all information in your
possession, custody or control or reasonably available to you. When the information

requested by a data request varies over time, state the response for each period of time as to which the response differs, and identify the time periods. If you cannot answer a data request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of any data request, you should so state in your response, describing in full your effort to obtain the information requested, and then proceed to respond to the fullest extent possible.

If you object to any part of any data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

These data requests are continuing in nature. Thus, in the event that you obtain additional information with respect to any data request after it has been answered, you are required to supplement your response promptly following receipt of such additional information, providing the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state providing the legal basis for your refusal.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

1. The form in which the requested information currently exists (identifying documents by title or description); and
2. The earliest dates, time period, and location that representatives of AT&T Kentucky may inspect your files, records or documents in which the information currently exists.

For each data request answered, provide the name, business address(es) and telephone number(s) of the person(s) answering, the title of such person(s), and the name of the witness(es) who will be prepared to testify concerning the matters contained in each response. If you do not intend to call or present a witness who is prepared to testify concerning the matters contained in any response, please so state.

DEFINITIONS

1. "AT&T" shall mean collectively BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky, and AT&T Communications of the South Central States, LLC.

2. "Windstream" shall refer to Windstream Kentucky West Inc., Windstream Kentucky East, Inc. – Lexington and Windstream Kentucky East, Inc. – London.

3. "Representative(s)" means those persons, past and present not in the direct employment of Windstream including outside counsel, who represent or represented the interests of Windstream in matters related to this proceeding.

4. "Employee(s)" means those persons in the direct employment of Windstream, past and/or present.

5. "Person" and "persons" include individuals, firms, partnerships, associations, trade associations, corporations, government entities, or other groups, however organized.

6. "Document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry,

diary, calendar, telex, telegram, e-mail, facsimile ("fax"), cable, report, recording, contract, agreement, study, handwritten note, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape, disk, file stored on computer, or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

7. "Identification" or "identify" when used in reference to: (i) a document other than a contract or agreement means to state: (1) its date; (2) its author; (3) the type of document; (4) its title; (5) its present location; (6) the name of each of its present custodians; (ii) a contract or agreement, means: (1) state the date of its making; (2) identify the parties thereto; (3) state whether the contract is oral or in writing; (4) state fully and precisely and separately all of the terms of said contract; (iii) a person other than an individual, means to state: (1) its full name; (2) its nature of organization, including the name of the state or country under the laws of which it was organized; (3) the address of its principal place of business; and (4) its principal line of business; (iv) a communication, requires you, if any part of the communications was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

8. "Possession, custody or control" includes actual constructive possession. Any document which is not in your immediate physical possession, but to which you

have or had a right to compel or secure production from a third person or which is otherwise subject to your control, shall be obtained and produced as directed.

9. "Relate to" or "relating to" means concern, consist of, refer to, pertain to, reflect, evidence, or to be in any way logically or factually connected with the matter discussed.

10. "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories anything that would not otherwise be brought within their scope.

11. "Concerning" shall mean comprising, describing, evidencing, referring to, responding to, quoting, or pertaining in any way to any part of a specified subject matter and/or to the contents or subject matter of any document including the specified subject matter.

12. "Communication" includes, without limitation of its generality, correspondence, statements, agreements, contracts, discussions, conversation, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as e-mail, intercoms, telephones, television or radio, data systems, and electronic reproductions and delivery systems.

DATA REQUESTS

1. Please identify the total number of revenue-producing access lines Windstream had at year end for each year from 2001 through 2007, and for 2008, if available, for the following:
 - (a) Single line Residential lines in service;
 - (b) Single line Business lines in service;
 - (c) Multi-line Residential lines in service;
 - (d) Multi-line Business lines in service;
 - (e) Other revenue producing access lines not included in your response to (a) to (d). Please specifically describe the types of lines that constitute the "other" category and identify the total number for each type.

2. Please identify revenues Windstream derived from the following for each year from 2001 through 2007, and for 2008, if available:
 - (a) Single line Residential lines in service;
 - (b) Single line Business lines in service;
 - (c) Multi-line Residential lines in service;
 - (d) Multi-line Business lines in service;
 - (e) Other revenue producing access lines not included in your response to (a) to (d). Please specifically describe the types of lines that constitute the "other" category and identify the revenues from each type.

3. Please provide the following:
 - (a) Windstream's weighted average local retail residential rate for unlimited calling (*i.e.*, 1FR); and
 - (b) Windstream's weighted average local retail business rates (*i.e.*, 1FB or 1MB).

4. Please identify Windstream's annual Subscriber Line Charge ("SLC") revenues for each year from 2001 through 2007, and for 2008, if available, derived from:
 - (a) Single line Residential lines in service;
 - (b) Single line Business lines in service;
 - (c) Multi-line Residential lines in service;
 - (d) Multi-line Business lines in service;
 - (e) Other revenue producing access lines not included in your response to (a) to (d). Please specifically describe the types of lines that constitute the "other" category and identify the SLC revenues from each type.

5. With respect to voice services, for each year from 2001 through 2007, and for 2008, if available, did Windstream have any lines in service that provided voice service to Windstream's end-user customers other than those identified in response to AT&T Data Request No. 1? If your response is anything other than an unqualified no, please provide the number of such lines for each year and identify the service(s) provided over those lines.
6. Please provide a list of the wireless providers that offer communications services to customers located in Windstream's service territory. Please state whether Windstream is affiliated with any wireless provider and, if so, identify the wireless provider and describe the affiliation. In addition, please provide the number and/or percentage of Windstream's access lines within the identified unaffiliated wireless providers' respective coverage areas.
7. Please provide a list of the cable providers that offer communications services to customers located in Windstream's service territory. Please state whether Windstream is affiliated with any cable provider and, if so, identify the cable provider and describe the affiliation. In addition, please provide the number and/or percentage of Windstream's access lines within the identified unaffiliated cable providers' service areas.
8. Please provide Windstream's total Kentucky *intrastate* switched access revenues and minutes of use ("MOUs") for each year from 2001 through 2007, and for 2008, if available. In addition, provide the following information for each rate element or rate category underlying the revenue for each of those years. (Examples of rate elements are Local Switching, DS1/DS3 Entrance Facility, Tandem Transport, Dedicated Tandem Trunk Port, Host/Remote Transport, Direct Trunk Transport, Transport Multiplexing, and any other applicable switched access rate category based on Windstream's current intrastate switched access tariff in Kentucky.)
 - (a) the current intrastate switched access rate, the intrastate MOUs, and the intrastate switched access revenues for each rate element or rate category; and
 - (b) if the quantities for any rate element or rate category are not measured in terms of MOUs, please provide them in terms of the actual unit of measurement specified in the tariff.
9. Please provide Windstream's total Kentucky *interstate* switched access revenues and minutes of use ("MOUs") for each year from 2001 through 2007, and for 2008, if available. In addition, please provide the following information for each rate element or rate category underlying the revenue for each of those years. (Examples of rate elements are Local Switching, DS1/DS3 Entrance Facility, Tandem Transport, Dedicated Tandem Trunk

Port, Host/Remote Transport, Direct Trunk Transport, Transport Multiplexing, and any other applicable switched access rate category based on Windstream's current *interstate* switched access tariff in Kentucky.)

- (a) the current *interstate* switched access rate, the *interstate* MOUs, and the *interstate* switched access revenues for each rate element or rate category; and
 - (b) if the quantities for any rate element or rate category are not measured in terms of MOUs, please provide them in terms of the actual unit of measurement specified in the tariff.
10. Regarding your responses to AT&T Data Request Nos. 8 and 9 above, if the intrastate and interstate switched access rates are not the same, please respond to the following:
- (a) Please admit or deny that the costs incurred by Windstream for intrastate switched access are the same as Windstream's interstate switched access costs.
 - (b) Please confirm whether Windstream's interstate switched access rates are lower than its intrastate switched access rates.
 - (c) Please state the effective date of Windstream's current interstate switched access rates.
 - (d) Does Windstream believe that its current interstate switched access rates are compensatory?
 - (e) Has Windstream ever filed a petition or motion with the FCC claiming that its interstate rates are not compensatory, and requesting any relief? If yes, provide all pleadings or petitions filed by Windstream at the FCC challenging that its current interstate switched access rates are below cost, including documents explaining the final disposition of such filing by the FCC. If no such pleadings or petitions were filed, please state so.
 - (f) Has Windstream reflected in any filings to its shareholders that its interstate revenues are below cost? If yes, provide such filings.
 - (g) Are the functions performed by Windstream while originating or terminating intrastate traffic materially different from when originating or terminating interstate traffic?
11. Please provide Windstream's annual reports to shareowners for each year from 2004 through 2007, and for 2008, if available.
12. Please provide the presentations Windstream made to financial analysts and potential investors in each year from 2001 through 2008.

13. For each year from 2005 through 2008, please provide Windstream's estimate of the percentage of terminating intercarrier traffic it receives that lacks sufficient call detail or signaling information to either (a) identify the carrier financially responsible for intercarrier charges or (b) apply the proper compensation regime for interstate access, intrastate access, and reciprocal compensation (such traffic generally and collectively known as "phantom traffic").
14. For each year from 2005 through 2008, please provide Windstream's estimate of the percentage of its terminating intercarrier traffic for which the compensation regime (interstate access; intrastate access; and reciprocal compensation) is mischaracterized.
15. Please provide Windstream's local exchange carrier ("LEC")-provided IntraLATA Toll MOU (for both intrastate and interstate) originated and terminated to Windstream in Kentucky for each year from 2001 through 2007, and 2008, if available.

Respectfully submitted,


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COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.,
D/B/A AT&T KENTUCKY, AND AT&T
COMMUNICATIONS OF THE SOUTH
CENTRAL STATES

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the individuals on the attached Service List by mailing a copy thereof, this ^{27th} 30th day of March 2009.


Mary K. Keyer

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