

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

COMMISSION STAFF'S FIRST INFORMATION
REQUEST TO BELLSOUTH
TELECOMMUNICATIONS, INC. D/B/A AT&T KENTUCKY
AND AT&T COMMUNICATIONS OF THE
SOUTH CENTRAL STATES, LLC

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 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein on or before April 24, 2009. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

AT&T shall make timely amendment to any prior response 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 request to which AT&T fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. 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.

1. Discuss the impact of the Defendants' current access charges upon AT&T Communications' long-distance Kentucky retail customers. Provide cost comparisons to AT&T Communications' long-distance retail customers in five other AT&T Communications states.

2. Quantify the effect of AT&T Communications' proposed reduction of access charges on the retail long-distance rates of AT&T Communications and other carriers in the market.

a. Will a reduction of the Defendants' access charges provide a windfall for long-distance providers, including AT&T Communications, instead of resulting in a corresponding reduction in the rates that consumers pay for long-distance?

b. Propose the methodology that should be used by the Commission to implement a reduction in the Defendants' access rates to avoid a windfall to long-distance providers while simultaneously allowing for reduced long-distance rates for consumers.

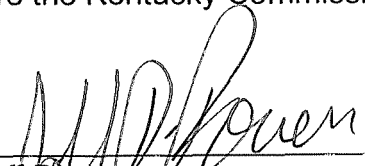
3. Provide details about the rate of AT&T Communications' retail subscriber loss in Kentucky attributed directly to the Defendants' access rates for the most recent ten calendar years.

4. On November 5, 2008, the Federal Communications Commission ("FCC") released a Further Notice of Proposed Rulemaking in *In re: Developing a Unified Inter-carrier Compensation*, CC Docket No. 01-92, *et al.*, that, among other things, proposed a reform of inter-carrier compensation including access charges on the intra-state level.

a. Did AT&T Communications provide any comments to the FCC in response to the petition?

b. If so, please provide copies of those comments.

c. Is anything proposed by the FCC contradictory to AT&T Communications' position in this proceeding before the Kentucky Commission?



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

DATED: MAR 30 2009

cc: Parties of Record

Case No. 2007-00503

Honorable Douglas F Brent
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

Dulaney L O'Roark III
VP & General Counsel - SE Region
Verizon
5055 North Point Parkway
Alpharetta, GA 30022

Kimberly Caswell
Associate General Counsel
Verizon
PO Box 110, MC FLTC0007
Tampa, FL 33601-0110

Honorable John N Hughes
Attorney at Law
124 West Todd Street
Frankfort, KY 40601

Honorable Mary K Keyer
General Counsel/Kentucky
BellSouth Telecommunications, Inc. dba AT&T
601 West Chestnut Street, Room 408
Louisville, KY 40203

Daniel Logsdon
Vice President, State Government Aff
Windstream Kentucky East, LLC
130 West New Circle Road
Suite 170
Lexington, KY 40505

Daniel Logsdon
Vice President, State Government Aff
Windstream Kentucky West, LLC
130 West New Circle Road
Suite 170
Lexington, KY 40505

Honorable Robert C Moore
Attorney At Law
Hazelrigg & Cox, LLP
415 West Main Street
P.O. Box 676
Frankfort, KY 40602