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February 12, 2010

Via Hand-Delivery

Mr. Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

FEB 12 2010

**PUBLIC SERVICE
COMMISSION**

Re: In the matter of MCI Communications Services, Inc., et al., v. Windstream
Kentucky West, Inc., et al ("Windstream"), Case #2007-00503

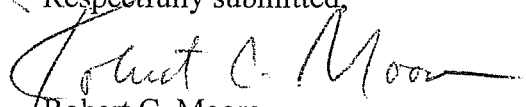
Dear Mr. Derouen:

Please find enclosed for filing in the above referenced case the original and five (5)
copies of the following papers:

- 1) Windstreams' Reservation of Rights and Data Requests To BellSouth
Telecommunications, Inc., et al;
- 2) Windstreams' Reservation of Rights and Data Requests To Sprint
Communications Company, L.P., et al; and,
- 3) Windstreams' Reservation of Rights and Data Requests To MCI
Communications Services, Inc., et al.

Please call me if you have any questions concerning this filing, and thank you for your
attention to this matter.

Respectfully submitted,



Robert C. Moore

RCM/db

Enclosures

cc: Kimberly Bennett

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

FEB 12 2010

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.)

PUBLIC SERVICE
COMMISSION

Complainants

CASE 2007-00503

v.

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

Defendants

WINDSTREAM KENTUCKY EAST, LLC AND WINDSTREAM KENTUCKY WEST, LLC'S RESERVATION OF RIGHTS AS ALTERNATIVELY REGULATED CARRIERS AND DATA REQUESTS TO MCI COMMUNICATIONS SERVICES, INC. D/B/A VERIZON BUSINESS SERVICES, BELL ATLANTIC COMMUNICATIONS, INC. D/B/A VERIZON LONG DISTANCE, NYNEX LONG DISTANCE COMPANY D/B/A VERIZON ENTERPRISE SOLUTIONS, TTI NATIONAL, INC., TELECONNECT LONG DISTANCE SERVICES & SYSTEMS COMPANY D/B/A TELECOM*USA AND VERIZON SELECT SERVICES, INC.

Windstream Kentucky East, LLC ("Windstream East") and Windstream Kentucky West, LLC submit that they are alternatively regulated local exchange carriers who are statutorily exempt from this proceeding. Without waiving and upon express reservation of all of their rights as alternatively regulated carriers, Windstream East and Windstream West submit the following Data Requests to MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc. Teleconnect Long Distance Services & Systems Company d/b/a Telecom*USA and Verizon Select Services, Inc. (collectively, "Verizon") to be answered in accord with the following:

DEFINITIONS

- “Windstream East” means Windstream Kentucky East, LLC f/k/a Windstream Kentucky East, Inc., and “Windstream West” means Windstream Kentucky West, LLC f/k/a Windstream Kentucky West, Inc.
- “You” and “your” refer to MCI Communications Services, Inc. d/b/a Verizon Business Services, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions, TTI National, Inc. Teleconnect Long Distance Services & Systems Company d/b/a Telecom*USA and Verizon Select Services, Inc., individually or collectively. As used herein, the terms “you” and “your” are intended to reflect all territories in which the aforementioned legal entities maintain operations.
- “Affiliate” as defined in Section 3 of the Federal Telecommunications Act of 1996 (“the Act”) means “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.” (47 U.S.C. §153(1).) As used herein, unless otherwise stated, the term “affiliate” is intended to reflect only the Kentucky operations of your affiliates.
- “Document” shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in your full or partial possession, custody or control, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files and copies of such writings or

records containing any commentary or notation whatsoever that does not appear in the original.

- “Referring” or “relating to” means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- “And” and “or” as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction shall serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.
- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by these discovery requests, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:
 - a. the type of document (*e.g.*, letter, memorandum, etc.);
 - b. the date of the document;
 - c. the title or label of the document;
 - d. the identity of the document originator;
 - e. the identity of each person to whom the document was sent;
 - f. a summary of the contents of the document; and
 - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

These discovery requests are to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control.

To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

If any request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

These requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known.

For each request, provide the name of your witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

DATA REQUESTS

1. Identify in detail (including call volumes, dates, and details of each claimed incident) all claims made by any carrier other than Windstream West or Windstream East that you or your affiliate caused intrastate switched access traffic from your end user customers to appear to be interstate in nature.

2. Produce all documents relating to your response to No. 1 above.

3. Identify in detail the ways in which you are currently unable to compete or otherwise operate in the long distance market in Kentucky.

4. Identify (a) the specific point in time and (b) the specific circumstances under which the intrastate switched access rates of Windstream East became unjust and unreasonable.

5. Identify (a) the specific point in time and (b) the specific circumstances under which the intrastate switched access rates of Windstream West became unjust and unreasonable.

6. Identify all of your affiliates', including your wireless affiliate(s), local services, offerings, calling plans, products, bundles, or promotions made available only to your long distance customers from 2006 to the present.

7. Identify which long distance carriers that customers of your wireless affiliate(s) may choose to provide their long distance service.

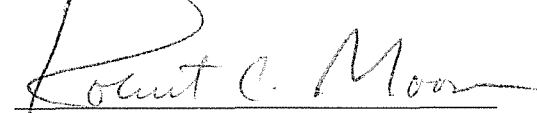
8. Identify in detail how you will flow through rate reductions granted by the Commission in this proceeding to only your end user customers in Kentucky including the amount of the expected rate reductions and specific impacts to your existing calling plans offered in Kentucky.

9. Explain with specificity how you intend to realize any expense reductions that would result from the Commission's grant of your requested relief in this proceeding and state specifically for what purposes you intend to use such expenses reductions in Kentucky.

10. For each year from 2006 to the present, provide, by local exchange carrier ("LEC") in Kentucky, the originating access minutes of use ("MOUs") for which you compensated each LEC or, in a case where you did not remit the compensation, for which you were billed by each LEC.

11. For each year from 2006 to the present, provide, by local exchange carrier ("LEC") in Kentucky, the terminating access minutes of use ("MOUs") for which you compensated each LEC or, in a case where you did not remit the compensation, for which you were billed by each LEC.

Respectfully submitted,



Robert C. Moore
HAZELRIGG & COX, LLP
415 West Main Street, 1st Floor
P. O. Box 676
Frankfort, Kentucky 40602-0676
(502) 227-2271

And

Kimberly K. Bennett
Windstream Communications
4001 Rodney Parham Road
Little Rock, AR 72212-2442

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon Douglas F. Brent and C. Kent Hatfield, Stoll, Keenon Ogden, PLLC, 2000 PNC Plaza, 500 West Jefferson Street, Louisville, Kentucky 40202, Dulaney L. O'Roark III, Vice President and General Counsel - Southern Region, Verizon, 5055 North Point Parkway, Alpharetta, Georgia 30022, John N. Hughes, 124 West Todd Street, Frankfort, Kentucky, 40601 and Mary K. Keyer, General Counsel/AT & T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky, 40203, by placing same in the U.S. Mail, postage pre-paid, this the 12th day of February, 2010.



Robert C. Moore