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March 5, 2010

**PLEASE NOTE THAT THE ORIGINAL OF THIS FILING
CONTAINS CONFIDENTIAL COMMERCIAL INFORMATION**

Via Hand-Delivery

Mr. Jeff R. Derouen

Executive Director

Public Service Commission

211 Sower Boulevard

P. O. Box 615

Frankfort, Kentucky 40602-0615

RECEIVED

MAR 05 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:

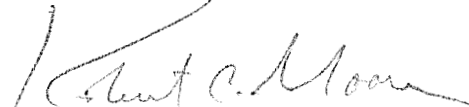
Pursuant to my telephone conversation with Tiffany Bowman with your office, please find enclosed for filing in the above referenced case the following documents:

- 1) The unredacted, confidential original of Windstream's Responses and Objections to Sprint Nextel's Initial Request for Information to Windstream and one redacted paper copy and four (4) redacted digital versions of same;
- 2) The unredacted, confidential original of Windstream's Responses and Objections to Verizon's First Requests for Information to Windstream and one redacted paper copy and four (4) redacted digital versions of same;
- 3) The unredacted, confidential original of Windstream's Responses and Objections to AT&T's First Data Requests to Windstream Kentucky West, Inc., Windstream Kentucky East, Inc. - Lexington and Windstream Kentucky East, Inc. - London, and one redacted paper copy and four (4) redacted digital versions of same;
- 4) The unredacted, confidential original of Windstream's Responses and Objections to Commission Staff's First Information Request to Windstream and five (5) redacted paper copies of same; and,
- 5) The above described Responses and Objections contain information and exhibits labeled as confidential and Windstream seeks confidential treatment of this confidential commercial information. Windstream accordingly files its Petition for Confidential Treatment for all information and exhibits labeled as confidential. Please note that in certain instances, Windstream has identified the first page or title page of a document containing a voluminous number of pages as confidential without labeling each individual page as confidential. In this case, Windstream requests that the entire document be treated as confidential.

Jeff Derouen
March 5, 2010
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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

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BEFORE THE PUBLIC SERVICE COMMISSION

MAR 05 2010

In the Matter of:

PUBLIC SERVICE COMMISSION

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

CASE NO. 2007-00503

v.

WINDSTREAM KENTUCKY WEST, INC.,)
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON)
AND WINDSTREAM KENTUCKY EAST, INC. - LONDON)
Defendants)

RESPONSES AND OBJECTIONS TO COMMISSION STAFF'S FIRST INFORMATION REQUEST

***** REDACTED VERSION *****

Windstream Kentucky West, LLC ("Windstream West") and Windstream Kentucky East, LLC ("Windstream East") submit the following responses and objections to Commission Staff's First Information Request:

OBJECTIONS APPLICABLE TO ALL FIRST INFORMATION REQUESTS

The following objections apply to each data request served by Commission Staff:

1. Windstream East and Windstream West object that they are alternatively regulated local exchange carriers who are statutorily exempt from this proceeding. Their submission of these Responses is without waiver of and with express reservation of all of their rights as alternatively regulated carriers.
2. Windstream East and Windstream West object to any request to the extent it may be construed as calling for the disclosure of information subject to a claim of privilege or immunities, including the attorney-client privilege, the attorney work product doctrine, the joint-defense privilege, or any other applicable evidentiary privilege or immunity from disclosure. The inadvertent disclosure of any information subject to such privileges or immunities is not intended to relinquish any privilege or immunity and shall not be deemed to constitute a waiver of any applicable privilege or immunity.

RESPONSES

Windstream East and Windstream West do not waive and fully preserve all of the foregoing objections, which are incorporated fully herein. Any information provided herein is made on the basis of the best information available to Windstream East and/or Windstream West at the time of gathering responsive materials or information, within the limits of, and subject to the general and specific objections set forth herein. Windstream East and Windstream West have attempted to locate responsive information through an investigation of sources from which such information might reasonably be expected to be found, but by means of responses and objections to the First Information Requests or in subsequent testimony or other filings, Windstream West and Windstream East reserve the right to supplement or modify their responses and objections if additional information becomes available.

The fact that Windstream East and Windstream West are willing to provide responsive information to any particular First Information Request does not constitute an admission or acknowledgment that the First Information Request is proper, that the information sought is within the proper bounds of discovery, or that other requests for similar information will be similarly treated. Further, any and all responses provided herein are for the purpose of the above-captioned case only and are not responses for any other purpose. Similarly, they may not be used against Windstream East or Windstream West in any other proceeding unless specifically agreed to by them or so ordered by a court or commission of competent jurisdiction.

Windstream West and Windstream East reserve the right to rely on facts, documents, or other evidence, which may develop or subsequently come to its attention, to assert additional objections or supplemental responses should it discover that there is information or grounds for objections and to supplement or amend these Responses at any time.

1. Refer to Verizon's Petition at page 7. State whether any of the Windstream companies currently pay non-traffic-sensitive access charges to local carriers that have billed for intra-LATA toll traffic generated by the Windstream Interexchange Carrier services. If such charges are not being paid, provide a detailed explanation as to why they are not paid.

RESPONSE: Yes, Windstream East and Windstream West pay such charges when they are billed to them subject to any regular billing type disputes that may arise in the ordinary course.

Windstream East / Windstream West Respondent: Cesar Caballero

3. Answer this question separately for Windstream Kentucky East and Windstream Kentucky West.

- a. How much did the company collect in non-traffic-sensitive revenue for 2008?
- b. How much revenue did the company collect in intra-state switched access for 2008?
- c. How much revenue did the company collect in intra-state special access for 2008?

RESPONSES: Windstream East and Windstream West object that subpart (c) seeks information that is irrelevant to the matters in Verizon's Complaint. Without waiving the foregoing, Windstream East and Windstream West provide as follows:

Windstream West -

(a) [REDACTED]
[REDACTED]
[REDACTED]

Windstream East -

(a) [REDACTED]
[REDACTED]
[REDACTED]

Windstream East / Windstream West Respondent: Cesar Caballero

Date: March 5, 2010

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, Mary K. Keyer, General Counsel/AT & T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky, 40203 and Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, by placing same in the U.S. Mail, postage pre-paid, this the 5th day of March, 2010.



Robert C. Moore