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April 1, 2010

**RECEIVED**

APR 02 2010

**PUBLIC SERVICE  
COMMISSION**

**VIA OVERNIGHT MAIL**

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

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 original and five (5) copies of  
AT&T's Third Data Requests to Windstream Kentucky West, Inc., Windstream Kentucky  
East, Inc. – Lexington and Windstream Kentucky East, Inc. – London.

Should you have any questions, please let me know.

Sincerely,

Mary K. Keyer

Enclosures

cc: Parties of Record

797619

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**RECEIVED**

APR 02 2010

**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 THIRD 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 29, 2010, hereby serves its Third 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.

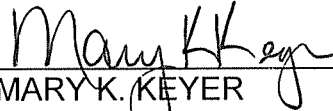
11. "Concerning" shall mean comprising, describing, evidencing, referring to, responding to, quoting, or pertaining in any way to any part of a specified subject matter and/or to the contents or subject matter of any document including the specified subject matter.

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 explain your response to AT&T Date Request No. 10(d) where you state that, "Neither Windstream West nor Windstream East believes that its current interstate switched access rates, by themselves, are compensatory."
2. Please admit or deny that the "replacement mechanisms" referenced in Windstream's response to AT&T Date Request No. 10(e) are actually end-user charges (i.e., retail rates) and/or universal service mechanisms, but not switched access rates.
3. Are there any material functional differences between Windstream's intrastate switched access service and other local interconnection services (e.g., origination and/or termination of wireless calls, origination and/or termination of VoIP calls, etc.)? If the answer is "Yes," or anything other than an unqualified "No," please explain those differences in detail.
4. Has Windstream or any of its parent companies or affiliates agreed as part of any regulatory case or settlement to reduce its intrastate switched access rates in any state to its corresponding interstate rates, either in their entirety or by rate element? Please list each of these states and the docket number of the proceeding, and provide a concise summary of the settlement or the disposition of each such case or settlement.
5. Does Windstream or any of its parent companies or affiliates in any other state mirror its interstate and intrastate switched access rates or any individual rate elements?
  - (a) Please list all states where the appropriate Windstream company mirrors these rates or rate elements;
  - (b) Please describe the proceedings or legislation that led the Windstream entity to mirror these rates and list the applicable docket numbers or code citations;
  - (c) Please state whether the affected Windstream entity appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge, and if the affected Windstream entity did not appeal or challenge, please state why it did not do so.
  - (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?
6. To the extent not already provided, please provide complete functioning spreadsheet versions of each cost model result provided in response to Verizon Question 26.

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

797618



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 1st day of April 2010.

Honorable Douglas F. Brent  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
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Louisville, KY 40202-2828

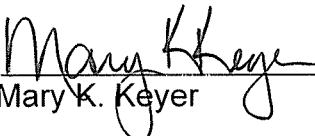
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