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April 2, 2010

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

RECEIVED

APR 05 2010

PUBLIC SERVICE
COMMISSION

*RE: MCI Communications, Inc. et al v. Windstream Kentucky East, LLC et al
Case No. 2007-00503*

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Verizon's Second Requests for Information to Windstream.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via the enclosed self-addressed postage paid envelope.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

DFB:

Enclosures

cc: Service List

105138.116493/571328.1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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APR 05 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 Service & Systems)
and Verizon Select Services, Inc.)

Complainants)

vs.)

Windstream Kentucky West, Inc.,)
Windstream Kentucky East, Inc. – Lexington,)
and Windstream Kentucky East, Inc. – London)

Defendants)

Case No. 2007-00503

VERIZON'S SECOND REQUESTS FOR INFORMATION TO WINDSTREAM

In accordance with the Commission's March 29, 2010 Order in this case, Verizon¹ hereby propounds the following information requests on Windstream Kentucky West, LLC and Windstream Kentucky East, LLC (collectively, "Windstream"). Under the March 29 Order, Windstream's responses to these requests are due by April 16, 2010.

DEFINITIONS AND INSTRUCTIONS

Verizon hereby incorporates the definitions and instructions contained in its First Requests for Information served on Windstream on March 30, 2009.

¹ Complainants MCImetro Transmission Access Transmission Services LLC, d/b/a Verizon Access Transmission Services, 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 Service & Systems d/b/a Telecom*USA and Verizon Select Services, Inc. are referred to herein collectively as "Verizon."

INFORMATION REQUESTS

40. Verizon served its First Requests for Information on Windstream in this proceeding on March 30, 2009. Given that timing, certain of Verizon's Requests sought information only through the end of 2008. To the extent not already provided, please provide updated responses to those Requests to reflect information through the end of 2009. In particular, please provide updated responses reflecting information through 2009 for Request Nos. 6, 7, 8, 10, 11, 14, 15, 20, 21, 22, 24, 26, 28, 34, and 35 from Verizon's First Requests for Information.
41. In its responses to Verizon's First Requests for Information and in the exhibits attached to those responses, Windstream indicates that it is providing data and information on behalf of "Windstream East" and "Windstream West." However, in certain instances, Windstream also provides data and information relating to "Windstream Kentucky East -- Lexington" and "Windstream Kentucky East -- London." Please explain the relationship between these four entities and how data or information provided for each relates to or is reflected in data and information provided for the others. For example, identify how data or information for "Windstream Kentucky East -- Lexington" and "Windstream Kentucky East -- London" relates to or is included within data or information listed for "Windstream East."
42. In response to Request for Information No. 1, regarding offerings by Windstream or its affiliates, Windstream referred to the information contained in Confidential Exhibit VZ#1-4. In response to Request for Information No. 3, regarding services, offerings, products, bundles or promotions made available only to customers of Windstream's interexchange carrier affiliate(s), Windstream also referred to the information contained in Confidential Exhibit VZ#1-4. Were all of the offerings identified in Confidential Exhibit VZ#1-4 made available only to customers of Windstream's interexchange carrier affiliate(s)? If not, please identify which were or were not.
43. Does Windstream currently use or has Windstream in the past used any intrastate switched access revenue to fund, support, or discount any competitive offering, including, but not limited to, "Nonbasic service" as defined by KRS 278.541(5), any "Package" as defined by KRS 278.541(7) including any combination with video service provided by a third party, "Broadband" as defined by KRS 278.5461(1), or long-distance service?
44. Is the Non-Traffic Sensitive Revenue Requirement ("NTSRR") included within any of the intrastate switched access rate elements Windstream listed in response to Request No. 6? Please explain why or why not.
45. In its response to Request No. 6, Windstream listed "Unbundled Prem Local Switching Term" as one of its intrastate switched access rate elements. Please identify this rate element, where it appears in Windstream's tariff(s), and what services, functions and/or features it is intended to cover.

46. In its response to Request No. 6, Windstream listed “LOC Trans Residual Interconnection Charge” as one of its intrastate switched access rate elements. Please identify this rate element, where it appears in Windstream’s tariff(s), and what services, functions and/or features it is intended to cover. Please further identify the origins of this rate element, including when and why it originally was included. State whether this particular rate element is tied to or otherwise based upon any particular cost of providing service. If not, please identify the purpose of this rate element – *i.e.*, what is it intended to recover?
47. In its response to Request No. 6, Windstream listed “LT Interconnection Rate Orig Prem” as one of its intrastate switched access rate elements. Please identify this rate element, where it appears in Windstream’s tariff(s), and what services, functions and/or features it is intended to cover.
48. In response to Request No. 8, subpart (a), Windstream provided “total intrastate revenues” for Windstream West and Windstream East for 2006 through 2008. Please reconcile each such response with the “Total Operating Revenue” line contained in the confidential exhibits provided in response to Request No. 27. For example, is the difference between the “YTD Regulated” amount listed in the exhibits responding to Request No. 27 and the subpart (a) responses to Request No. 8 due to interstate revenues? Please explain. In addition, pursuant to Request No. 40, above, please provide the same information for 2009, as well.
49. In response to Request No. 8, subpart (b), Windstream provided “total intrastate switched access revenues” for Windstream West and Windstream East for 2006 through 2008. Please reconcile each such response with the “Network Access Services Revenue” line contained in the confidential exhibits provided in response to Request No. 27. For example, is the difference between the “YTD Regulated” amount for “Network Access Services Revenue” listed in the exhibits responding to Request No. 27 and the subpart (b) responses to Request No. 8 due to interstate revenues? Please explain. In addition, pursuant to Request No. 40, above, please provide the same information for 2009, as well.
50. In response to Request No. 8, subpart (e), Windstream stated that “total revenues for local telephone service (including any EUCL or SLC revenues)” for Windstream West and Windstream East for 2006 through 2008 are “not available in the form for [sic] for the time period requested.” Are local telephone service revenues available in any form for the time period requested? If so, please provide the information in the form in which it is available.
51. With reference to Windstream’s response to Request No. 8, subpart (e), please identify whether the “total revenues for local telephone service (including any EUCL or SLC revenues)” are included in the “Local Network Services Revenue” line contained in the confidential exhibits provided in response to Request No. 27. To the extent the “YTD Regulated” amount for “Local Network Services Revenue” listed in the exhibits responding to Request No. 27 includes intrastate services provided by Windstream

companies, please identify those amounts for each year. In addition, pursuant to Request No. 40, above, please provide the same information for 2009, as well.

52. In the various Confidential Exhibit VZ#12 documents that Windstream provided in response to Request No. 12, Windstream repeatedly refers to carriers other than Windstream. For example, the exhibits refer to MOU's "from AT&T Usage" and "from BELL Usage," a percentage of MOU's "Allocated to Carriers," "Allocated to AT&T" and "Allocated to BELL," and to "Access lines and Revenue to be allocated to Carriers," "to South Central Bell" and to "AT&T." Please define each of these references to carriers other than Windstream and explain how they relate to the calculation of Windstream's NTSRR charges.
53. In the various Confidential Exhibit VZ#12 documents that Windstream provided in response to Request No. 12, Windstream lists figures for "Total Kentucky Access Lines Applicable to NTS charge" at various different dates. Please identify whether those figures reflect actual line counts for the corresponding dates or some other calculation. If those figures do not reflect actual line counts for the corresponding dates on each Exhibit, please explain why not, what they reflect, and when and how those figures were derived.
54. In Confidential Exhibit VZ#12 KEast 2009, Windstream indicates that it is listing "Access Line Count for August 2002 – Access Line Count established by regulatory body and this can not be changed, once set unless qualifying event occurs." Please identify the regulatory body that established this Access Line Count and when and how it did so, including identifying any pertinent Commission order or rule and the circumstances surrounding the establishment of this line count. Please state the basis for your statement that the Access Line Count "can not be changed." Please define the term "qualifying event" as used in your statement and/or identify what would constitute a "qualifying event."
55. Does Windstream contend that its service-specific costs of providing intrastate switched access service (as they would be calculated in a service-specific cost study) include as a cost component the cost of the local loop? If so, please identify those costs and provide documents sufficient to support such loop costs as a component of intrastate switched access service.
56. Has Windstream heretofore prepared any cost study reflecting its costs of providing intrastate switched access services or otherwise detailing how its intrastate switched access rates are derived? If so, please provide a copy of such cost study and all supporting materials.
57. Please provide a copy of the application and all supporting information that Windstream submitted to the Broadband Initiatives Program administered by the U.S. Department of Agriculture's Rural Utilities Service ("RUS") seeking federal stimulus grants to expand broadband availability.

April 2, 2010

Respectfully submitted,

By: _____

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National, Inc., Teleconnect Long Distance
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served by First Class Mail on those persons whose names appear below this 2nd day of April, 2010.

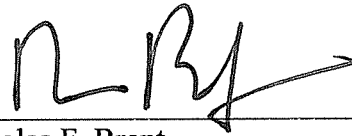
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