



S T O L L · K E E N O N · O G D E N
P L L C

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099
www.skofirm.com

DOUGLAS F. BRENT
DIRECT DIAL: 502-568-5734
douglas.brent@skofirm.com

March 16, 2010

RECEIVED

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

MAR 17 2010

PUBLIC SERVICE
COMMISSION

RE: An Investigation Into The Traffic Dispute Between Windstream Kentucky East, LLC, Brandenburg Telephone Company And MCImetro Access Transmission Services, LLC d/b/a Verizon Access Case No. 2008-00203

Dear Mr. DeRouen:

Enclosed are an original and ten copies of MCImetro Access Transmission Services LLC's Supplemental Requests for Information to Brandenburg Telephone Company and Windstream Kentucky East, LLC. These are being filed pursuant to an agreed procedural schedule proposed by the parties.

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

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

DFB:

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAR 17 2010
PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION INTO THE TRAFFIC)
DISPUTE BETWEEN WINDSTREAM)
KENTUCKY EAST, LLC, BRANDENBURG) CASE NO. 2008-00203
TELEPHONE COMPANY AND MCIMETRO)
ACCESS TRANSMISSION SERVICES, LLC)
d/b/a VERIZON ACCESS)

**MCIMETRO'S SUPPLEMENTAL REQUESTS FOR INFORMATION
TO BRANDENBURG TELEPHONE COMPANY**

MCImetro Access Transmission Services, LLC d/b/a Verizon Access
("MCImetro") propounds the following requests for information to Brandenburg
Telephone Company.

INSTRUCTIONS

Each response shall be answered under oath or be accompanied by a signed
certification of the preparer or 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.

The respondent shall make timely amendment to any prior responses 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 requests to which
the respondent fails or refuses to furnish all or part of the requested information,
respondent shall provide a written explanation of the specific grounds for their failure to
completely and precisely respond.

Careful attention should 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.

INTERROGATORIES

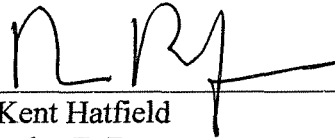
18. Does Brandenburg claim that MCImetro must indemnify it for any amounts Brandenburg is ordered to pay Windstream Kentucky East LLC (“Windstream”) in this proceeding? If so:
 - a. If the indemnity claim is based on one or more tariff provisions, please identify each such provision, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - b. If the indemnity claim is based on one or more statutory provisions, please identify each such provision, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - c. If the indemnity claim is based on one or more FCC or Commission rules or regulations, please identify each such rule or regulation, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - d. If the indemnity claim is based on one or more FCC or Commission orders, please identify each such order, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - e. If the indemnity claim is based on one or more contractual provisions, please identify each such provision, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - f. If the indemnity claim is based on any other legal theory, please identify each such theory, the basis for Brandenburg’s claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.

19. Does Brandenburg assert claims against MCImetro in this proceeding other than for indemnification? If so, please state each such claim.
20. With respect to each claim stated in response to Interrogatory No. 2:
 - a. If the claim is based on one or more tariff provisions, please identify each such provision, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - b. If the claim is based on one or more statutory provisions, please identify each such provision, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - c. If the claim is based on one or more FCC or Commission rules or regulations, please identify each such rule or regulation, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - d. If the claim is based on one or FCC or more Commission orders, please identify each such order, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - e. If the claim is based on one or more contractual provisions, please identify each such provision, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
 - f. If the claim is based on any other legal theory, please identify each such theory, the basis for Brandenburg's claim that it requires MCImetro to pay Brandenburg, the amount claimed, and how that amount was calculated.
21. Please identify any bills Brandenburg has sent MCImetro relating to the traffic at issue in this proceeding.

DOCUMENT REQUESTS

1. Please produce all documents supporting or otherwise relating to Brandenburg's response to Interrogatory No. 18.
2. Please produce all documents supporting or otherwise relating to Brandenburg's response to Interrogatory No. 20
3. Please produce all documents supporting or otherwise relating to Brandenburg's response to Interrogatory No. 21.

Respectfully submitted,



C. Kent Hatfield
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Phone: (502) 333-6000
Fax: (502) 333-6099
douglas.brent@skofirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing requests has been served by first class mail on those persons whose names appear below this 16th day of March, 2010.

John E. Selent
Edward T. Depp
Holly C. Wallace
DINSMORE & SHOHL, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

Bruce F. Clark
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634



Douglas F. Brent