

COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

MAY 12 2010

In the Matter of:

PUBLIC SERVICE  
COMMISSION

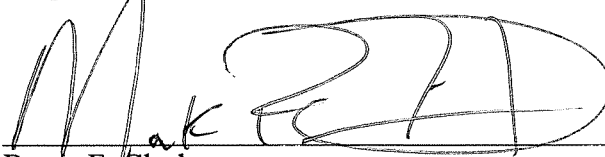
AN INVESTIGATION INTO THE TRAFFIC DISPUTE )  
BETWEEN WINDSTREAM KENTUCKY EAST, LLC, )  
BRANDENBURG TELEPHONE COMPANY AND )  
MCIMETRO ACCESS TRANSMISSION SERVICES, LLC )  
D/B/A VERIZON ACCESS )

Case No. 2008-00203

WINDSTREAM KENTUCKY EAST, LLC'S REPLY IN SUPPORT OF MOTION FOR  
ISSUANCE OF SUBPOENAS DUCES TECUM

In its Response to Windstream Kentucky East, LLC's ("Windstream") Motion for Issuance of Subpoenas *Duces Tecum* ("Motion for Subpoenas"), Brandenburg Telephone Company ("Brandenburg Telephone") acknowledged that it did not produce all of the relevant documents in response to data requests issued by Windstream. Specifically, Brandenburg Telephone conceded that "[i]t appears true that the 2007 Email was overlooked and, thus, not produced by Brandenburg Telephone (although it was produced by MCImetro) in response to Windstream's 2008 data requests." Even disregarding the other assertions in Brandenburg Telephone's response, the fact that Brandenburg Telephone "overlooked" pertinent documents when responding to Windstream's data requests alone offers a sufficient basis to grant Windstream's Motion for Subpoenas. Windstream should be afforded the opportunity to explore whether Brandenburg Telephone and Verizon Access have other documents in their possession that are responsive to data requests submitted by Windstream in this matter. Accordingly, Windstream asks that the Commission grant its Motion for Subpoenas.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet", written over a horizontal line.

Bruce F. Clark

Mark R. Overstreet

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COUNSEL FOR WINDSTREAM KENTUCKY

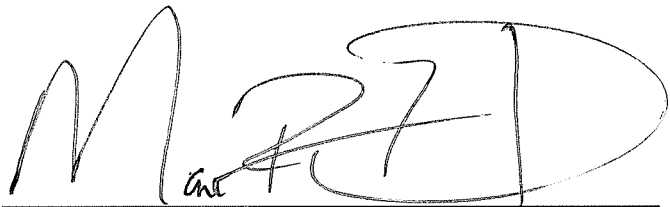
EAST, LLC

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served by first class mail, postage prepaid, on the following on this 12th day of May, 2010.

John E. Selent  
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A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', written over a horizontal line. The signature is stylized with large, sweeping letters.

Mark R. Overstreet