

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTHEAST TELEPHONE, INC.)	
)	CASE NO.
COMPLAINANT)	2008-00279
)	
V.)	
)	
BELLSOUTH TELECOMMUNICATIONS, INC.)	
D/B/A AT&T KENTUCKY)	
)	
DEFENDANT)	

COMMISSION STAFF'S DATA REQUEST
TO SOUTHEAST TELEPHONE, INC.

SouthEast Telephone, Inc. ("SouthEast"), pursuant to 807 KAR 5:001, shall file with the Commission the original and six copies of the information requested herein on or before April 3, 2009. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the 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.

SouthEast shall make timely amendment to any prior response 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 request to which SouthEast fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

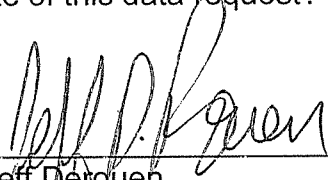
Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to SouthEast's Response to Item 3 of the Commission's December 11, 2008 data request. Provide a reference to the interconnection agreement or other contract between the parties on which SouthEast relies to support its argument that BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky") should charge SouthEast a conversion charge of \$10.00 rather than the loop installation charges and port installation charges for converted lines.

2. Refer to SouthEast's Response to Item 5 of the Commission's December 11, 2008 data request. Does SouthEast assume that every line in service is capable of being served by an unbundled copper loop non-designed (UCL-ND)? Explain the basis for your answer.

3. Does SouthEast agree that every location it serves is capable of being served by an unbundled copper loop non-designed (UCL-ND)?

4. Refer to AT&T Kentucky's Response to Item 2 of the Commission's December 11, 2008 data request. How many conversions has SouthEast actually ordered from AT&T Kentucky as of the date of this data request? How many of those circuit changes have been instituted as of the date of this data request?



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED: MARCH 20, 2009

cc: Parties of Record

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