

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

In the Matter of the Application of)
Cincinnati Bell Telephone Company LLC)
For Declaration of Compliance With) Case No. 2009-00029
Directory Requirements Applicable to)
Electing Telephone Companies Pursuant)
to KRS 278.541 to 278.544)

ATTORNEY GENERAL'S
INITIAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Cincinnati Bell Telephone Company, LLC [hereinafter referred to as "CBT"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for CBT with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, 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.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

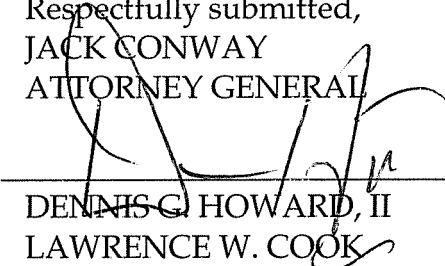
(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(11) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(12) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



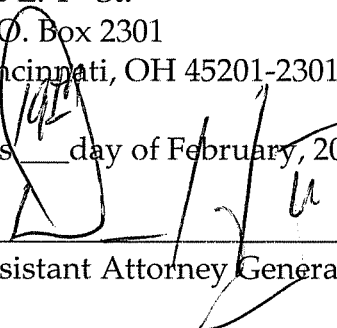
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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Mark A. Romito
Director - Government Relations
Cincinnati Bell Telephone Company
201 E. 4th St.
P. O. Box 2301
Cincinnati, OH 45201-2301

this 14th day of February, 2009



Assistant Attorney General

**Attorney General's Initial Data Requests
to Cincinnati Bell Telephone Co., LLC
Case No. 2009-00029**

1. With regard to the company's service territory:
 - (a) What is the penetration rate of computers on a per capita basis?
 - (b) What is the internet access on a per capita basis?
 - (c) What is the percentage of households which still use landlines?
2. In the event that there is an electrical outage, extended or not as with the recent ice storm, how is an individual to obtain an emergency number, other than 911? (An example includes a telephone number to report a downed power line.)
3. How many of Cincinnati Bell's customers are over the age of 65?
4. How many of Cincinnati Bell's customers live in locations that would be considered rural?
5. Please list the physical locations where Cincinnati Bell proposes that customers would be able to obtain a printed directory.
 - (a) Please provide an estimated driving mile distance which a customer would have to drive in the company's service territory to reach a retail store.
6. Please reference CBT's application at page 7 where the company states that "for those customers who cannot visit a retail store, an alternative method of shipping or delivering the printed directories will be used to get the customer a book upon request." State with particularity what the company proposes as the alternative(s).
7. State whether CBT's white pages directory provides solely residential listings, or offers both residential and business listings.
8. Please provide information regarding the cost of printing and distributing the printed "white page" directory to customers.

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9. Are the printing and distribution costs referenced in response to question no. 8, above, offset by income received by advertisers in the "yellow pages" portion of the directory? If so, provide the amounts of the cost offset.
 - (a) Are the printing and distribution costs referenced in response to question no. 8, above, offset by income received by any advertisers in the white pages portion of the directory? If so, provide the amounts of the cost offset.
 - (b) Provide the fee structures CBT uses to charge businesses for placing their information in the white pages, including, at a minimum, additional charges for larger / bold face type face.
10. Does Cincinnati Bell intend its application to stop automatic distribution of the "white pages" also include suspending distribution of the "yellow pages"?
11. Please state whether CBT earns a profit from the advertisements in the "yellow pages" portion of the directory.
12. Please admit that the arguments by Cincinnati Bell regarding information contained in the "white pages" portion of the directory being out of date when printed also apply to the "yellow pages" portion of the directory.
13. Expressed on a percentage basis and for the last five printings of the directory, please provide information on how many listings in the "white pages" change from year to year.
14. Has CBT considered the possibility of giving its customers the option to expressly opt-out of receiving the white pages directory instead of opting-in?
 - (a) If so, has the company conducted any estimates of its cost savings utilizing this approach?

- (b) Has the company considered options regarding how to provide such an opt-out, including, at a minimum, whether to allow customers to submit such a request via internet (either via e-mail or on the company's web site), and/or on the customer's bill?
15. State whether CBT has actively encouraged the recycling of old directories, and whether the company has conducted any estimates of savings that any such recycling program could yield.
 16. Are there any payphones in CBT's service territory? If so, and assuming CBT's application is granted, how does CBT believe an individual using the phone would have access to unknown numbers that would otherwise be available by way of a local telephone book?
 17. If the Commission grants CBT's request, would it be willing to waive any directory assistance charges (regardless of whether the assistance request is initiated in person over telephone, or via internet website)?