

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:)
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Windstream Kentucky East, LLC for)
Arbitration of an Interconnection)
Agreement with New Cingular Wireless)
PCS, LLC, D/B/A AT&T Mobility) Case No. 2009-00246
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**WINDSTREAM KENTUCKY EAST, LLC'S RESPONSES TO NEW CINGULAR
WIRELESS PCS, D/B/A AT&T MOBILITY'S FIRST DATA REQUESTS TO
WINDSTREM KENTUCKY EAST, LLC**

Windstream Kentucky East, LLC ("Windstream East") submits as follows in response to New Cingular Wireless PCS d/b/a AT&T Mobility's ("AT&T Mobility") First Data Requests to Windstream East.

GENERAL OBJECTIONS TO DEFINITIONS OR INSTRUCTIONS

Windstream East objects to any of AT&T Mobility's definitions or instructions to the extent they purport to require production by Windstream East of knowledge and/or information protected by the attorney-client privilege, the work product doctrine or other applicable privilege or immunity, including privileged information possessed by its attorneys. Further, Windstream East objects to any attempt by AT&T Mobility to request information pertaining to entities not subject to the arbitration or this Commission's jurisdiction.

Windstream East also objects to any data request propounded by AT&T Mobility to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information or documents that are vague, overly burdensome, or not relevant to the claims asserted by AT&T Mobility in this matter.

Windstream East further objects to providing information that was previously provided to AT&T Mobility, that would require Windstream East to construct information not maintained in the regular course of business, or that otherwise is publicly available to AT&T Mobility.

Lastly, Windstream East objects to the extent that the number of data requests exceeds the limit allowed by Kentucky Rules of Civil Procedure CR 33.01.

SPECIFIC RESPONSES AND OBJECTIONS TO DATA REQUESTS

1. Provide a native Excel version of Windstream's cost study with no enabling of any "Protect Workbook" and "Protect Sheet".

RESPONSE: Windstream East objects to this request on the basis that this is information that was previously provided to AT&T Mobility.

2. Provide the total Windstream minutes of use ("MOUs") for each year for the last five years (2004-2008) for the following categories used in Windstream's cost study. Provide an explanation for any zero values.
- a. Local Terminating
 - b. Local Originating
 - c. Local Tandem Terminating
 - d. Local Tandem Originating
 - e. EAS Terminating
 - f. EAS Originating
 - g. Interstate Toll Terminating
 - h. Interstate Toll Originating
 - i. Intrastate Toll Terminating
 - j. Intrastate Toll Originating
 - k. Recip Comp Terminating
 - l. Recip Comp Originating
 - m. Host/Remote Terminating
 - n. Host/Remote Originating
 - o. LATA Tandem Terminating
 - p. LATA Tandem Originating

RESPONSE: Windstream East objects to this request to the extent that it requests data that is not relevant to the claims asserted by AT&T Mobility in the matter. Without waiving its objection, Windstream East refers AT&T Mobility to the attached Exhibit A.

Windstream East Party Supporting the Response: David Blessing

3. Provide Windstream's annual reports to shareowners for the past two years (2007-2008).

RESPONSE: Windstream East objects to this request as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that this information may be found on www.windstream.com at <http://www.sn1.com/irweblinkx/financialdocs.aspx?iid=4121400>.

4. Provide all Windstream's Form 10-K reports submitted to the Securities and Exchange Commission ("SEC") since January 1, 2004.

RESPONSE: Windstream East objects to this request as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that this information may be found on www.windstream.com at <http://www.sn1.com/irweblinkx/docs.aspx?iid=4121400&start=1>.

5. Provide all Windstream's annual and quarterly reports, including gross revenue reports, filed with the Kentucky Public Service Commission since January 1, 2004.

RESPONSE: Windstream East objects to this request as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that Kentucky Public Service Commission website may be accessed at http://psc.ky.gov/agencies/psc/industry/telcom_idx.htm.

6. Provide all Windstream's annual reports and Form 477 reports for Kentucky filed with the Federal Communications Commission ("FCC") since January 1, 2004.

RESPONSE: Windstream East objects to this request as being overly broad and vague, and not likely to lead to any relevant or discoverable information in this proceeding.

7. Provide all materials Windstream has provided to financial analysts and potential investors in investor presentations since January 1, 2008.

RESPONSE: Windstream East objects to this request as being overly broad and vague, and not likely to lead to any relevant or discoverable information in this proceeding, and is publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that investor information may be found on www.windstream.com at <http://www.sn1.com/IRWebLinkX/GenPage.aspx?IID=4121400&GKP=202930>.

8. Does Windstream offer Voice over Internet Protocol ("VoIP") with its broadband services in Kentucky?
 - a. If so, please describe Windstream's VoIP, including when Windstream began offering VoIP in Kentucky and the current number of Windstream's VoIP subscribers in Kentucky.

RESPONSE: Windstream East objects to this request as being overly broad and vague, and not likely to lead to any relevant or discoverable information in this proceeding.

9. Provide all work papers, including source documents, supporting Windstream's cost study. Work papers should include, to the extent they exist, all documentation supporting claimed equipment, material and labor costs, as well as all network measurements, such as claimed minutes of use per year, length of interoffice cables, bandwidth of interoffice transmission equipment, cost of debt, cost of equity, etc.

RESPONSE: Additional cost study support materials are in the following files, which are attached herein upon disc labeled as Exhibit B:

File	Description	Purpose
KY219_ASAP_channel usage by exch.pdf	KY East Lexington – toll trunk and private line counts	ATTACHMENT A “Electronics Data” page inputs
KY219_ASAP_facility count by exch.pdf	KY East Lexington - IX circuit counts by size, DS3 and higher	ATTACHMENT A “Electronics Data” page inputs
KY219_ASAP_High Cap By Exchange.pdf	KY East Lexington - High capacity circuit counts	ATTACHMENT A “Electronics Data” page inputs
KY219_Loop Summary table rpt.pdf	KY East Lexington – local private line loop counts	ATTACHMENT A “Electronics Data” page inputs
KY219_monthly totals by exch_access lines.pdf	KY East Lexington –access line totals	ATTACHMENT A “Electronics Data” page inputs
KY219_Summarize Electronic data.pdf	KY East Lexington – termination equipment quantities and material dollars	ATTACHMENT A, summary and report by exchange
KY220_ASAP_channel usage by exch.pdf	KY East London – toll trunk and private line counts	ATTACHMENT A “Electronics Data” page inputs
KY220_ASAP_facility count by exch.pdf	KY East London - IX circuit counts by size, DS3 and higher	ATTACHMENT A “Electronics Data” page inputs
KY220_ASAP_High Cap By Exchange.pdf	KY East London - High capacity circuit counts	ATTACHMENT A “Electronics Data” page inputs
KY220_Loop Summary table rpt.pdf	KY East London – local private line loop counts	ATTACHMENT A “Electronics Data” page inputs
KY220_monthly totals by exch_access lines.pdf	KY East London – access line totals	ATTACHMENT A “Electronics Data” page inputs
KY220_Summarize Electronic data.pdf	KY East London – termination equipment quantities and	ATTACHMENT A, summary and report by exchange

	material dollars	
KY East_Lexington IX Fiber Cables.pdf	KY East Lexington – Summary of cables making up IX facilities	ATTACHMENT B “IX Facilities Detail” cable lengths
KY East_London IX Fiber Cables.pdf	KY East London – Summary of cables making up IX facilities	ATTACHMENT B “IX Facilities Detail” cable lengths
InPlace Price Book_2007 Update.xls	Support data for development of cable material and installation costs	ATTACHMENT B “IX Facilities Detail” pricing support

Windstream East Party Supporting the Response: David Blessing

10. Explain the distinction between “composite rate of return,” “interstate rate of return,” and “intrastate rate of return” as found on the “Cost Factors” page of Windstream’s cost study. This explanation should specify which “return” is used in developing Windstream’s recommended costs.

RESPONSE: None of the “returns” on the “Cost Factors” page of Windstream East’s cost study listed in Request No. 10 are used in developing Windstream East’s recommended costs. The cost of capital used to develop Windstream East’s recommended rates is found on the “Cost Factors” tab, Line 43 (cell I49) and is labeled “Cost of Capital”.

Windstream East Party Supporting the Response: David Blessing

11. Explain how expenses associated with service order activities have been excluded in the development of maintenance and joint factors used in Windstream's cost study.

RESPONSE: The expense associated with service order activities (central office service activation work and/or premise visit) is not readily identifiable and thus was not removed from the maintenance factor inputs. The joint expenses consist of network administration, property taxes, and central office building expenses which do not include any service order activities.

Windstream East Party Supporting the Response: David Blessing

12. Explain the method employed by Windstream to ensure that the costs claimed in its study are forward-looking.

RESPONSE: Windstream East adheres to the guidelines provided in FCC Rules and Regulations Part 51, Paragraph 51.505 to ensure that the costs in the study are forward-looking. The methods used in the Windstream East cost study are consistent with those guidelines and are identical to methodologies used by Windstream in other proceedings to develop TELRIC-based rates in Kentucky and other jurisdictions.

Windstream East Party Supporting the Response: David Blessing

13. For all switching and transport costs claimed in Windstream's study, provide the historical "booked" cost for each line item.

RESPONSE: Windstream objects to this request as not being relevant to the forward-looking costs developed in Windstream East's cost study. Without waiving its objection, Windstream East's booked costs, to the extent they are available, may be found in the cost study provided to AT&T Mobility.

Windstream East Party Supporting the Response: David Blessing

14. Explain what is meant by the description “monthly cost per minute” found on the Results page of Windstream’s cost study.

RESPONSE: The term “monthly cost per minute” means the rate for each minute of use on Windstream East’s network based on the monthly cost and demand for such minutes.

Windstream East Party Supporting the Response: David Blessing

15. Explain the purpose of the NTS Percents found in the Input section of Windstream's cost study.

RESPONSE: The NTS Percent inputs found in the Input section of Windstream East's cost study are used to eliminate that portion of the investment inputs which are non-traffic sensitive. The NTS percents are not applicable to end-office switching investment where the non-traffic sensitive portion associated with line ports and loop termination equipment has already been removed.

Windstream East Party Supporting the Response: David Blessing

16. Explain whether the following components are treated as traffic-sensitive or non-traffic-sensitive in Windstream's study:
- a. Switch processor and matrix costs;
 - b. Initial software and software upgrade costs.

RESPONSE: All components listed in 16a. and 16b. are treated as traffic-sensitive in Windstream East's cost study.

Windstream East Party Supporting the Response: David Blessing

17. List all "host" and all "remote" switches in Windstream's network.

RESPONSE: Windstream objects to this request as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that this information is listed on the "Host_Remote Switches" pages (9th page) of ATTACHMENT C and ATTACHMENT D. The column title "SW_Type" identifies whether the switch is a host (H), remote (R) or stand alone (S).

Windstream East Party Supporting the Response: David Blessing

18. State whether each remote switch listed performs a switching function for a call dialed by an end user connected to that remote switch and terminated to another end user connected to that remote switch.

RESPONSE: Windstream East objects to this request as being overly broad and vague, and not likely to lead to any relevant or discoverable information in this proceeding. Without waiving its objection, Windstream East states that all remotes switches except eight are capable of performing a switching function as described. The eight switches which are not capable of performing such switching are Bryantsville, Nancy, Paint Lick, Vicco, Bee Spring, Brownsville, Mammoth Cave, and Park City.

Windstream East Party Supporting the Response: David Blessing

19. Provide a list, on a line-item level of detail, showing all switching investments and costs treated as non-usage-sensitive in Windstream's cost study.

RESPONSE: The following switching investment items are treated as non-usage sensitive:

- a. LCE's, LCM's, Dwrs, & Lines (Line Port Equipment)
- b. MDF and Protector (Loop Termination Equipment)
- c. One half of Conversion Costs
- d. Portion of power equipment associated with items in (a) and (b) above.

Windstream East Party Supporting the Response: David Blessing

20. Provide the account balances for 2006, 2007 and 2008 for the accounts used to develop Windstream's proposed forward-looking common cost factor. Also, provide the equivalent account balances for the first six months of 2009.

RESPONSE: Account balances for 2006, 2007, 2008 and six months ending June 30, 2009 are provided in Exhibit "DR20_Common Cost Account Inputs.xls" attached herein as Exhibit C.

Windstream East Party Supporting the Response: David Blessing

21. What is the vintage of the account balances in the column entitled "Embedded Kentucky East Plant" on the "Capital ACF" page in Windstream's cost study?

RESPONSE: The vintage year for the referenced account balances is 2007. Each amount is the average of the monthly average balances for January through December 2007.

Windstream East Party Supporting the Response: David Blessing

22. Provide the account balances for 2006, 2007 and 2008 for the accounts corresponding to the rows for the column entitled "Embedded Kentucky East Plant" on the "Capital ACF" page in Windstream's cost study.

RESPONSE: Account balances for 2006, 2007, and 2008 are provided in Exhibit "DR22_Embedded Ky East Plant.xls" attached herein as Exhibit D.

Windstream East Party Supporting the Response: David Blessing

23. In addition to the 2007 data found in Windstream's cost study, provide the account balances for 2006 and 2008 for the accounts associated with the "Embedded Plant Distribution" found on the "Capital ACF" page.

RESPONSE: Account balances for 2006 and 2008 are provided in Exhibit "DR23_Embedded Ky East Plant.xls" attached herein as Exhibit E.

Windstream East Party Supporting the Response: David Blessing

24. Describe all linkages between data found in the "Transport Termination Equipment Report" and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

RESPONSE: The calculated total at the bottom of the "Fiber Equip \$" column on the "IX Fiber Equip \$" worksheet in the "Transport Termination Equipment Report" (page 38 of the pdf file) contains the material cost input entered on page 12, line 6 in the pdf file.

Windstream East Party Supporting the Response: David Blessing

25. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for terminating equipment prices for Windstream Kentucky East that correspond to the "IX Electronics Prices" found on the "Electronics Prices" page in the "Transport Termination Equipment Report".

RESPONSE: Terminating equipment material prices were provided based on engineering review of numerous price quotes and actual completed installations. Prices represent the best prices available to Windstream East at the time cost inputs were developed and cannot be tied to specific contracts and price quotes. Please refer to the Response to Data Request No. 26 where available documentation has been provided.

Windstream East Party Supporting the Response: David Blessing

26. Provide a description of the specific equipment, including the identification of the hardware vendor, associated with Windstream's "IX Electronics Prices" found on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report".

RESPONSE: Please review Exhibits "DR26a_Electronics Material Prices.xls" attached herein as Exhibit F and "DR26b_Electronics Price Support.xls" attached herein as Exhibits G for a description of the specific equipment, including the identification of the hardware vendor, for Windstream East's "IX Electronics Prices".

Windstream East Party Supporting the Response: David Blessing

27. Explain why the "Loop Electronic Price" is the same as the "IX Electronic Price" for each corresponding facility type as shown on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report".

RESPONSE: The "Loop Electronic Price" and the "IX Electronic Price" are the same because the cost model uses the same equipment to provide circuit terminations for the local loop and inter-exchange circuits. Refer to Response to Data Request No. 26 for additional details.

Windstream East Party Supporting the Response: David Blessing

28. Explain the acronym "STS1" as shown on the "Electronics Prices" page in Windstream's "Transport Termination Equipment Report".

RESPONSE: "STS1" refers to a Synchronous Transport Signal – 1 ("STS-1") circuit, which is one third of an OC-3. The STS-1 is a basic unit of transmission in SONET, operating at 51.84 Mbit/s.

Windstream East Party Supporting the Response: David Blessing

29. Name and describe the network systems that are sources for the "Electronic Data" pages in Windstream's "Transport Termination Equipment Report".

RESPONSE: Windstream East's ASAP (Access Services and Provisioning) system is the primary source used for inputs to the "Electronic Data" pages. This engineering database contains the inventory and relevant information for all Windstream East circuits. Access line information is obtained from Windstream East's MIROR (Mechanized Inventory Records Reconciliation) system, which is utilized to manage numbering and line card requirements.

Windstream East Party Supporting the Response: David Blessing

30. Page 51 of the pdf file containing Windstream's cost study is labeled "ATTACHMENT B, Electronics Input for Cost Study". Is this the intended description for the material found at pages 52-71? If not, please explain.

RESPONSE: "ATTACHMENT B, Electronics Input for Cost Study" is not the intended description for the material found at pages 52-71; the description is for the material found at pages 50-70. The title for ATTACHMENT B, pages 52-71 should be "Facilities Input for Cost Study".

Windstream East Party Supporting the Response: David Blessing

31. Describe all linkages between data found in ATTACHMENT B and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

RESPONSE: The calculated "Materials" column total on page 51 in ATTACHMENT B contains the material cost input entered on page 12, line 5 in the pdf file. The "Plus Minor Materials" percent on page 51 in ATTACHMENT B comes from the percent entered as "Other Material %" on page 17, column (d) for IX Transport Facility and HR Transport Facility in the pdf file. The "Plus Sales Tax" percent on page 51 in ATTACHMENT B comes from the percent entered on page 13, line 89 in the pdf file. The Installation (Adjusted), Engineering, and Freight percents calculated under the "Install Cost" column on page 51 in ATTACHMENT B contain the EF&I percents entered on page 17, columns (h), (i) and (j) for IX Transport Facility and HR Transport Facility in the pdf file.

Windstream East Party Supporting the Response: David Blessing

32. Explain the meaning of each acronym found under the heading "InPlaceCode" in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.

RESPONSE: The descriptions for the acronyms found under the heading "InPlaceCode" are provided in Exhibit "DR32_Cable InPlaceCode_Descriptions.xls" attached herein as Exhibit H.

Windstream East Party Supporting the Response: David Blessing

33. Explain the length information found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B. This explanation should explicitly describe how the length is calculated for each entry associated with the Albany exchange.

RESPONSE: The lengths found on the "IX Facilities Detail" pages in Windstream East's ATTACHMENT B are the totals of all cable segments for each exchange for each listed size. Lengths were determined through analysis of engineering CAD/E records for inter-exchange cable routes. Exhibit "DR33_Albany_Interexchange cable.xls" attached herein as Exhibit I contains the detailed data extracted from the engineering records for the Albany exchange. Any copper cables were replaced with fiber, and cables less than 24 fibers were changed to 24-fibers in the forward-looking network design.

Windstream East Party Supporting the Response: David Blessing

34. Provide the vintage(s) of the material and install cost data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.

RESPONSE: The vintage of the material cost data on the "IX Facilities Detail" pages in Windstream's ATTACHMENT B is September 2007. The install cost data found on the "IX Facilities Detail" pages in Windstream East's ATTACHMENT B was developed based on placement costs provided in May 2007.

Windstream East Party Supporting the Response: David Blessing

35. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for the material costs associated with Windstream's IX facilities in Kentucky consistent with the data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B.

RESPONSE: Windstream East has requested copies of these contracts and permission to share these contracts, but will be unable to obtain them by the date this Response is due to be filed. Windstream East reserves the right to file a supplemental response as soon as the contracts are available and all required permissions have been granted by the vendors to allow Windstream East . Windstream East will be requesting confidential treatment for the documents when they are received and produced.

Windstream East Party Supporting the Response: David Blessing

36. Who performs the installation activities associated with IX facilities in Kentucky consistent with the data found in the "IX Facilities Detail" pages in Windstream's ATTACHMENT B?
- a. If outside vendors are involved, provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for the installation work performed by outside vendors to install IX facilities in Kentucky.
 - b. If Windstream employees are involved, describe each work group included in the "install cost" and the average labor rate for employees performing the work in each work group.

RESPONSE: Outside vendors usually perform the installation activities associated with IX facilities in Kentucky. Windstream East has requested a copy of the contract applicable to Kentucky and permission to share this contract, but will be unable to obtain it by the date this Response is due to be filed. Windstream East reserves the right to file a supplemental response as soon as the contract is available and all required permissions have been granted by the vendor to allow Windstream East to share this. Windstream East will be requesting confidential treatment for the documents when they are received and produced

Windstream East Party Supporting the Response: David Blessing

37. Describe all the linkages between data found in ATTACHMENT C and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

RESPONSE: The dollar total above the column titled "End Office Switching" on the first page (page 72) in ATTACHMENT C, plus the corresponding amount from ATTACHMENT D, equals the material cost input entered on page 12, line 1 in the pdf file. The dollar total above the column titled "SS7 Switching" on the first page (page 72) in ATTACHMENT C, plus the corresponding amount from ATTACHMENT D, equals the material cost input entered on page 12, line 2 in the pdf file. The dollar total above the column titled "Tandem Switching" on the first page (page 72) in ATTACHMENT C, plus the corresponding amount from ATTACHMENT D, equals the material cost input entered on page 12, line 3 in the pdf file. The percent above the column titled Minor Materials on the second page (page 73) in ATTACHMENT C contains the Other Material percent entered on page 17, column (d) for End Office Switching and SS7 Switching in the pdf file. The column totals for Minor Materials, Installation, Engineering, and Freight on the second page (page 73) in ATTACHMENT C are added to the corresponding totals for the same columns on the second page in ATTACHMENT D to arrive at the Total Loading amounts at the bottom of page 84. The percents above the columns titled Minor Materials, Installation, Engineering, and Freight on the third

page (page 74) in ATTACHMENT C contain the Other Material and EF&I percents entered on page 17, columns (d), (h), (i) and (j) for Tandem Switching in the pdf file.

Windstream East Party Supporting the Response: David Blessing

38. Describe all linkages between data found in ATTACHMENT D and the main portion of Windstream's cost study (pages 2-32 in the pdf file).

RESPONSE: The dollar total above the column titled "End Office Switching" on the first page (page 83) in ATTACHMENT D, plus the corresponding amount from ATTACHMENT C, equals the material cost input entered on page 12, line 1 in the pdf file. The dollar total above the column titled "SS7 Switching" on the first page (page 83) in ATTACHMENT D, plus the corresponding amount from ATTACHMENT C, equals the material cost input entered on page 12, line 2 in the pdf file. The dollar total above the column titled "Tandem Switching" on the first page (page 83) in ATTACHMENT D, plus the corresponding amount from ATTACHMENT C, equals the material cost input entered on page 12, line 3 in the pdf file. The percents at the very bottom of the columns titled Installation, Engineering, and Freight on the second page (page 84) in ATTACHMENT D contain the EF&I percents entered on page 17, columns (h), (i) and (j) for End Office Switching and SS7 Switching in the pdf file.

Windstream East Party Supporting the Response: David Blessing

39. Provide for each row found on the "Switch Costs" and "Tandem Costs" pages of Windstream's ATTACHMENT C and ATTACHMENT D the following information:

- a. CLLI code for existing switch
- b. Switch type for existing switch
- c. An explanation of the modeled switch type

RESPONSE: Please refer to Exhibit "DR39_KY East Switches.xls" attached herein as Exhibit J.

Windstream East Party Supporting the Response: David Blessing

40. Provide the source file "MDF Power Transmission Worksheet.xls" mentioned in Note (1) as found on the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.

RESPONSE: Please refer to the file "DR40_MDF Power Transmission Worksheet.xls" attached herein as Exhibit K.

Windstream East Party Supporting the Response: David Blessing

41. Explain why HAI 5.3 default values for the SS7 Switching and Tandem Fixed and Variable Switch costs are found on the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D are reasonable estimates to measure Windstream's SS7 costs in Kentucky.

RESPONSE: The variable SS7 and Tandem switching investments in the Windstream East model are developed in a manner similar to that done in AT&T ILEC's own HAI model. The cost inputs to Windstream East's model were set at the same level as the defaults contained in the HAI model. Windstream engineers reviewed the default values and determined that they should produce a reasonable investment amount for Windstream East since these types of costs vary little between companies. To avoid any controversy the default values were adopted for use by Windstream East.

Windstream East Party Supporting the Response: David Blessing

42. Describe the location of any Windstream SS7 switches and the specific vendor for each SS7 switch. In addition, if Windstream leases any SS7 services, the description should indicate how this fits into its forward-looking SS7 network.

RESPONSE: The SS7 switches for Windstream East are located in Dalton, Georgia and Moultrie, Georgia.

Windstream East Party Supporting the Response: David Blessing

43. Provide Windstream's current contracts, or applicable price quotes if current contracts do not exist, for all prices found on the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.

RESPONSE: Windstream East has requested copies of these contracts and permission to share these contracts, but will be unable to obtain them by the date this Response is due to be filed. Windstream East reserves the right to file a supplemental response as soon as the contracts are available and all required permissions have been granted by the vendors to allow Windstream East to share these contracts. Windstream East will be requesting confidential treatment for the documents when they are received and produced.

Windstream East Party Supporting the Response: David Blessing

44. Provide a general description of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D. This description should, at a minimum, identify the modeled switch as either a circuit switch or a soft switch as well as identify the switch vendor.

RESPONSE: The switching equipment contained in Windstream East's ATTACHMENTs C and D is a Nortel CS1500 soft switch platform which is configured to function as a typical end office or tandem switch in the TDM mode.

Windstream East Party Supporting the Response: David Blessing

45. Provide the capacity limits of the switching and other equipment contained in Windstream's ATTACHMENT C and ATTACHMENT D that are part of the technology modeling contained in Windstream's cost study.

RESPONSE: The capacity limit of the CS1500 switch used in Windstream East's model is 48,000 lines.

Windstream East Party Supporting the Response: David Blessing

46. Provide the "Analysis of all Windstream closed jobs for the year ending 12/31/06" mentioned on the last page of the "Switch Cost Data" pages of Windstream's ATTACHMENT C and ATTACHMENT D.

RESPONSE: Please refer to the file "DR46_Windstream Capital Loadings_COE_2006.xls" attached herein as Exhibit L.

Windstream East Party Supporting the Response: David Blessing

47. Provide the vintage for the working lines data found on the "Tandems Switches" page of Windstream's ATTACHMENT C.

RESPONSE: The vintage for working lines data found on the "Tandems Switches" page of Windstream East's ATTACHMENT C is as of December 31, 2007.

Windstream East Party Supporting the Response: David Blessing

48. Provide 2008 end-of-year working line counts for each switch found on the
“Tandem Switches” page of Windstream’s ATTACHMENT C and
ATTACHMENT D.

RESPONSE: The 2008 tandem line data is included in the Excel file “DR50_KY East
Line Data_2008.xls” attached herein as Exhibit M.

Windstream East Party Supporting the Response: David Blessing

49. Provide the vintage for the working lines and host lines data found on the "Host_Remote Switches" pages of Windstream's ATTACHMENT C and ATTACHMENT D.

RESPONSE: The vintages for the working and host lines data found on the "Host_Remote Switches" pages of Windstream East's ATTACHMENT C and ATTACHMENT D is as of December 31, 2007.

Windstream East Party Supporting the Response: David Blessing

50. Provide 2008 end-of-year working line and host line counts for each switch found on the "Host_Remote Switches" pages of Windstream's ATTACHMENT C and ATTACHMENT D.

RESPONSE: The 2008 working and host line data is provided in Excel file "DR50_KY East Line Data_2008.xls" attached herein as Exhibit M.

Windstream East Party Supporting the Response: David Blessing

51. Please provide the number of existing softswitches Windstream has under the following circumstances:

- a. Located in Kentucky
- b. Located outside of Kentucky
- c. Located in Kentucky and interconnected with the public switched network
- d. Located outside Kentucky and interconnected with the public switched network
- e. Located in Kentucky and the same softswitch vendor and model as contained in Windstream's cost study
- f. Located outside Kentucky and the same softswitch vendor and model as contained in Windstream's cost study

52. Describe product management activities associated with transport and termination that are contained in the account balance for product management found in the "Common Costs" pages of Windstream's cost study.

RESPONSE: The company personnel performing product management activities support all revenue-generating "products" for Windstream East, including those classified as wholesale services. Transport and termination activities covered by the rates developed in this cost study are part of wholesale services. Windstream East's cost study removes the activities directly associated with retail services. This leaves functions that are either directly associated with wholesale services or applicable to general management of all revenue streams.

Windstream East Party Supporting the Response: David Blessing

53. Describe sales and advertising activities associated with transport and termination that are contained in the account balance for product management found in the "Common Costs" page of Windstream's cost study.

RESPONSE: The company personnel performing sales activities support all products and services provided by Windstream East, including those classified as wholesale services. Transport and termination activities covered by the rates developed in this cost study are part of wholesale services. Some of the advertising is not tied to a specific product but is designed to increase usage of all communications services, which indirectly affects transport and termination volumes. Windstream East's cost study identifies and removes the sales and advertising activities directly associated with retail services. This leaves sales and advertising costs that are either directly associated with wholesale services or applicable to general support of all products and services provided by the company.

Windstream East Party Supporting the Response: David Blessing

54. Describe customer services activities associated with transport and termination that are contained in the account balance for customer services found in the "Common Costs" page of Windstream's cost study.

RESPONSE: The company personnel performing customer service activities support all Windstream East customers, including those classified as wholesale services. Transport and termination activities covered by the rates developed in this cost study are part of wholesale services. Windstream East's cost study removes the activities directly associated with retail services based upon an analysis of recorded expenses by subaccount. This leaves functions that are either directly associated with wholesale services or applicable to general support of all services. Functions applicable to transport and termination are set up and maintenance of wholesale customer accounts, maintenance of usage records, billing and collection costs, and response to customer (carrier) inquiries.

Windstream East Party Supporting the Response: David Blessing

55. Identify the portion of current investment and current expenses for switching expense as found in the "Cost Factors" page of Windstream's cost study associated with digital circuit switching equipment and digital packet switch equipment.

RESPONSE: Windstream East objects to this request as being overly vague.

56. Identify the portion of current investment and current expenses for circuit expense as found in the "Cost Factors" page of Windstream's cost study associated with radio systems, electronic circuit equipment and optical circuit equipment.

RESPONSE: Windstream East objects to this request as being overly vague.

57. Does Windstream currently have in its Kentucky network any of the modeled switches found in the "Switch Cost Data" pages of its cost study? If so, identify each such switch, and whether the switch performs end-office switching, tandem switching or host-remote switching functions.

RESPONSE: Windstream East does not currently have in its Kentucky network any of the Nortel CS1500 modeled switches found in the "Switch Cost Data" pages of its cost study.

Windstream East Party Supporting the Response: David Blessing

58. Explain the distinction between “working lines” and “host lines” as used in the “Host_Remote Switches” pages found in Windstream’s cost study.

RESPONSE: Working lines are the active line circuits in the switch per engineering records. Host lines include the working lines for the host switch plus those working lines for each remote switch associated with the host switch. The host line counts were not used to calculate switch investment costs.

Windstream East Party Supporting the Response: David Blessing

59. Identify (and locate by specific tab, column and row reference) in Windstream's cost study its proposed reciprocal compensation rates for terminating traffic originating from AT&T Mobility.

RESPONSE: Windstream East's proposed reciprocal compensation rates for terminating traffic originating from AT&T Mobility are located on the page entitled "Reciprocal Compensation Interconnection Weighted Composite Results Kentucky East", line item 1.

Windstream East Party Supporting the Response: David Blessing

60. Provide a 2009 demand forecast for each of the MOU traffic categories Windstream has identified in its cost study.

RESPONSE: The 2009 demand forecast used in the study is as follows:

Windstream East Party Supporting the Response: David Blessing

61. Identify any Kentucky dockets in which Windstream has provided within the past five years any cost estimate for a usage service such as local usage, intrastate switched access, interstate switched access and reciprocal compensation. For each identified docket, please provide the following information:
- a. The name of each study containing a cost estimate for a usage service;
 - b. The month and year each study containing a cost estimate for usage service was submitted in its docket;
 - c. Windstream's public testimony, if any, describing cost study;
 - d. For each qualifying cost study, identify the cost methodology used to develop the cost estimate, *e.g.*, Total Service Long-Run Incremental Cost ("TSLRIC"), Total Element Long-Run incremental Cost ("TELRIC"), average embedded cost, etc.

RESPONSE: Windstream East objects to this request as being overly broad and vague, as well as being information that is readily and publicly available to AT&T Mobility. Without waiving its objection, Windstream East states that Kentucky Public Service Commission website may be accessed at http://psc.ky.gov/agencies/psc/industry/telcom_idx.htm.

Windstream East Party Supporting the Response: David Blessing

62. What percentage of traffic originated by AT&T Mobility and sent to Windstream does Windstream claim should be subject to Windstream's terminating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's terminating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If not traffic studies or other documentation is provided, explain the basis for the claimed percentages.

RESPONSE: AT&T Mobility claims that it delivers all of the interMTA traffic originated by its customers through an interexchange carrier ("IXC"). Any terminating access charges in this situation would be paid by the IXC. Based on AT&T Mobility's representations, Windstream therefore is willing to agree that zero percent of traffic originated by AT&T Mobility and sent to Windstream should be subject to Windstream's terminating access charges.

Windstream East party Supporting the Response: Scott Terry

63. What percentage of traffic originated by Windstream and sent to AT&T Mobility does Windstream claim should be subject to Windstream's originating access charges?
- a. Of the traffic Windstream claims should be subject to Windstream's originating access charges, what percentage is interstate and what percentage is intrastate?
 - b. Provide copies of all traffic studies and other documentation supporting the percentages claimed in the above answers.
 - c. If not traffic studies or other documentation is provided, explain the basis for the claimed percentages.

RESPONSE: Windstream East proposes that five percent of the traffic originated by Windstream East and sent to AT&T Mobility should be subject to Windstream East's originating access charges and that sixty percent of this traffic is interstate traffic, and forty percent of this traffic is intrastate traffic. The fact that such traffic exists is evident based upon readily available public information on AT&T's website. Consistent with Windstream East's position throughout this negotiation, Windstream East has consistently notified AT&T Mobility that it is willing to consider a different percentage based on documentation already in AT&T Mobility's possession (including but not limited to cell site information and traffic studies) or other relevant documentation. Although Windstream East has requested this documentation, AT&T Mobility has not provided any of its traffic studies or other documentation to Windstream East so that

Windstream East can make a firm proposal based on actual documentation relevant to this issue.

Windstream East party Supporting the Response: Scott Terry

Respectfully Submitted,

Date: 9/25/09

By: Robert C. Moore

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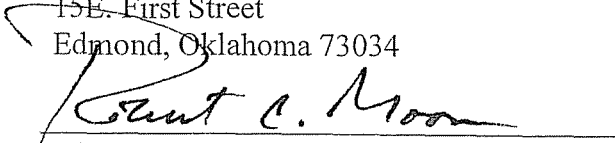
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CERTIFICATE OF SERVICE

On this 25th day of SEPTEMBER, 2009, true and correct copies of the foregoing **RESPONSES** were transmitted via United States ~~certified~~ mail, postage prepaid, return receipt requested to: *Rem*

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Robert C. Moore

WINDSTREAM EAST EXHIBIT A

Summary of Minutes Requested Docket No. 2009-00246
DR Request #2

Type	2004	2005	2006	2007	2008
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**EXHIBIT B HAS BEEN
REDACTED**

WINDSTREAM EAST EXHIBIT C (PART 1 OF 2)

Windstream Kentucky East
 Common Cost Account Balance Inputs

Account Description	Source	Account Balances				
(a)	(b)	2006	2007	2008	Jun-09	2009 Annualized

WINDSTREAM EAST EXHIBIT C (PART 1 OF 2)

Windstream Kentucky East
Common Cost Account Balance Inputs

Category	Description	Current Investment	Current Expenses	Investment Account	Expense Account
(a)	(b)	(c)	(d)	(e)	(f)

WINDSTREAM EAST EXHIBIT D

Windstream Kentucky East
Embedded Kentucky East Plant

<u>Account</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>
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WINDSTREAM EAST EXHIBIT E

Total Windstream Wireline
Embedded Plant Distribution

WINDSTREAM EAST EXHIBIT F (PART 1 OF 12)

**Windstream TELRIC Model
Interoffice Transport Inputs
Workpapers**

WINDSTREAM EAST EXHIBIT F (PART 2 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 4 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 4 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 5 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 6 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 7 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 8 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 8 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 9 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 10 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 11 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 12 OF 12)

WINDSTREAM EAST EXHIBIT F (PART 12 OF 12)

WINDSTREAM EAST EXHIBIT G (PART 1 OF 4)

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WINDSTREAM EAST EXHIBIT H

WINDSTREAM EAST EXHIBIT H

WINDSTREAM EAST EXHIBIT H

WINDSTREAM EAST EXHIBIT H

WINDSTREAM EAST EXHIBIT I (PART 1 OF 2)

WINDSTREAM EAST EXHIBIT I (PART 2 OF 2)

WINDSTREAM EAST EXHIBIT J (PART 1 OF 3)

**WINDSTREAM EAST EXHIBIT J
(PART 2 OF 3)**

WINDSTREAM EAST EXHIBIT J (PART 3 OF 3)

WINDSTREAM EAST EXHIBIT K (PART 1 OF 4)

WINDSTREAM EAST EXHIBIT K (PART 2 OF 4)

WINDSTREAM EAST EXHIBIT K (PART 3 OF 4)

WINDSTREAM EAST EXHIBIT K (PART 4 OF 4)

WINDSTREAM EAST EXHIBIT L

WINDSTREAM EAST EXHIBIT M (PART 1 OF 3)

WINDSTREAM EAST EXHIBIT M (PART 2 OF 3)

WINDSTREAM EAST EXHIBIT M (PART 3 OF 3)