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October 16, 2009

RECEIVED

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PUBLIC SERVICE
COMMISSION

VIA COURIER

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: Petition of Windstream Kentucky East, LLC, for Arbitration of an
Interconnection Agreement With New Cingular Wireless PCS, d/b/a AT&T
Mobility
KPSC 2009-00246

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and five (5) copies of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility's ("AT&T Mobility") Supplemental Responses to Item Nos. 18, 20, 21, 23, and 28 of Windstream's First Data Requests dated September 11, 2009.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

Enclosures

cc: Party of Record

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REQUEST: Please refer to page 6 of your Response to Windstream's Petition for Arbitration, Issue 4. Please identify in detail your basis for your claim that the appropriate reciprocal compensation rate for Windstream should be no higher than \$0.002 per minute of use.

RESPONSE: At this time, AT&T Mobility has no documents supporting this answer. As discovery proceeds and AT&T Mobility reviews Windstream's proposed cost study, AT&T Mobility will develop such documents and will produce them pursuant to supplemental responses.

REQUEST: Please refer to pages 7 and 8 of your Response to Windstream's Petition for Arbitration, Issue 6. Please identify in detail your basis for your claim that Windstream's fill factors used in its cost study are not compliant with the "efficient network" requirement of 47 C.F.R. §51.505(b)(1).

RESPONSE: The basis for our claim that Windstream's fill factors used in its cost study are not compliant with the "efficient network" requirement of 47 C.F.R. §51.505(b)(1) is contained in 47 C.F.R. §51.505(b)(1) itself.

REQUEST: Please refer to page 8 of your Response to Windstream's Petition for Arbitration, Issue 7. Please identify in detail your basis for your claim that the cost of capital in Windstream's cost study should be no higher than 9%.

RESPONSE: The 9% factor was based on a general estimate of the cost of capital in the current economy. As discovery proceeds and AT&T Mobility reviews Windstream's proposed cost study, AT&T Mobility may develop documents applicable to this issue. If so, such documents will be produced pursuant to supplemental responses.

REQUEST: Please refer to page 9 of your Response to Windstream's Petition for Arbitration, Issue 9. Please identify in detail your basis for your claim that Windstream's switching, transport and other costs in Windstream's cost study should be reduced by at least 25% to comply with FCC regulations.

RESPONSE: The 25% factor was a general estimate based upon the experience of AT&T Mobility's personnel in reviewing switching costs. The general estimate was based upon type of technology, not type of company. As discovery proceeds and AT&T Mobility reviews Windstream's proposed cost study, AT&T Mobility may develop documents applicable to this issue. If so, such documents will be produced pursuant to supplemental responses.


REQUEST: Please identify in detail how you determined the cost of equity used in your review of Windstream's cost study.

RESPONSE: See AT&T Mobility's supplemental response to Windstream's First Data Request 21.

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served on the following individual by electronic mail and by mailing a copy thereof, this 16th day of October 2009.

Honorable Robert C. Moore
Attorney at Law
Hazelrigg & Cox, LLP
415 West Main Street
P. O. Box 676
Frankfort, KY 40602



Mary K. Keyer