

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

In the Matter of:)
)
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 SECOND DATA REQUESTS TO WINDSTREAM
KENTUCKY EAST, LLC**

Windstream Kentucky East, LLC ("Windstream East") submits as follows its response to New Cingular Wireless PCS d/b/a AT&T Mobility's ("AT&T Mobility") Second 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

64. Windstream Kentucky East in Exhibit A attached to its response to AT&T Mobility's First Data Request #2 appears to say that it does not "record" certain minutes of use ("MOU") data for the years requested and, thereby, the data are not available.
- a. Has Windstream Kentucky East recorded any usage information (including sampling information) such as MOUs or message counts for any period since 2004 for any category for which Windstream responded that it did not "record" the requested MOUs? For each category Windstream Kentucky East has responded affirmatively, described the recorded usage information including its vintage and provide the most recent information recorded, if available.
 - b. Did Windstream Kentucky East regularly record any usage information (including sampling information) such as MOUs or message counts for any period prior to 2004 for any category for which Windstream responded that it did not "record" the requested MOUs?
 - c. Does Windstream Kentucky East regularly record such usage information (including sampling information) such as MOUs or message counts currently for any category for which Windstream responded it did not "record" the requested MOUs?

RESPONSE:

- a. Windstream East does not record local traffic. Special usage studies are used to determine the local and EAS portion for the cost study. This usage is not standard EMI data (210 records), but in translation recordings of Pegs and CCS seconds. The data is at a trunk group level and is only identified by the trunk group number and owner. This usage is then classified by type to toll, local, or EAS. This data is not retained for any specific time period. Time period used in the study was July 2008 to Dec 2008.
- b. See Response to Data Request #64(a).

c. See Response to Data Request #64(a).

Windstream East Party Supporting the Response: David Blessing

65. Windstream Kentucky East in Exhibit A attached to its response to AT&T Mobility's First Data Request #2 appears to say that it does not "retain" certain minutes of use ("MOU") data for the years requested and, thereby, the data are not available.
- a. Has Windstream Kentucky East recorded and retained any usage information (including sampling information) such as MOUs or message counts for any period since 2004 for any category for which Windstream responded that it did not "retain" the requested MOUs? For each category Windstream Kentucky East has responded affirmatively, described the usage information including its vintage and provide the most recent information retained.
 - b. Explain Windstream Kentucky east's policy for retaining MOU data.

RESPONSE:

- a. See Response to Data Request #64(a).
- b. See Response to Data Request #64(a).

Windstream East Party Supporting the Response: David Blessing

66. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_ASAP_channel usage by exch.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please explain the meaning of each reported numerical amount and of any notes as well as explain all acronyms found in the report for this exchange.
 - c. Please explain the faint handwritten note found towards the top of the first page of the report.
 - d. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. **ASAP** – Windstream East's **Access Services and Provisioning** application is the source for data on this report.
- b. Following are the traffic carrying circuit totals with acronym meanings as reported for the Albany, KY exchange:
 - o Toll Trunks = 81 circuits.
 - o Mixed Trunks = 216 circuits.
 - o Extended Area Service (EAS) Trunks = 0 circuits.
 - o Private Line (P.L.) Trunks - Interexchange = 29 lines.
 - o Private Line (P.L.) Trunks - Local = 0 lines.
 - o Private Line (P.L.) Trunks - Other = 12 lines.
 - o Dedicated Interexchange Channels – Toll = 48 circuits.
 - o Dedicated Interexchange Channels – Mixed = 0 circuits.
 - o Dedicated Interexchange Channels – EAS = 0 circuits.
 - o ALLTEL * Tandem Channels – Toll = 0 circuits.
 - o ALLTEL * Tandem Channels – Mixed = 0 circuits.
 - o ALLTEL * Tandem Channels – EAS = 0 circuits.
 - o Common Transport Channels – Toll = 33 circuits.
 - o Common Transport Channels – Mixed = 216 circuits.
 - o Common Transport Channels – EAS = 0 circuits.The quantities in the "P.L. Jurisdictional Splits Table" are not used.
- c. The note at the top of the report reads "Input 5/27/08." This was the date the circuit quantities were keyed to a Microsoft ACCESS database for use by the Windstream TELRIC models.

- d. The data shown on this report does not map to any specific cells on the EXCEL workbooks that were provided in response to AT&T Mobility's First Data Request #1.

Windstream East Party Supporting the Response: David Blessing

67. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_channel usage by exch.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #66(b)? If not, please describe anything that would be different to its response to AT&T Mobility Second Data Request #66(b).
 - b. Using the data for the first exchange found in the report, *i.e.*, ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cells(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

68. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_ASAP_facility count by exch.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please explain the meaning of each reported numerical amount.
 - c. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please explain the meaning of the reported CLLI codes. Do these CLLI codes identify the "A" and "Z" locations of the circuit, i.e., the end points of a circuit?
 - d. Please explain the handwritten note found on the first page of the report.
 - e. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.
 - f. The one page report for SHDNKYXA (page 150 of 158 in the pdf file) is partially obscured. Please provide a legible copy of the full page.

RESPONSE:

- a. See Response to Data Request #66(a).
- b. The reported numerical amounts to the right of the listed circuits are simply a sum of the various circuit types. They are repeated in a summary at the bottom of the report.
- c. The reported Circuit ID's are in standard CLF Format for Facility Circuits and the CLLI Codes do identify the "A" and "Z" locations of the circuit.
- d. The note at the top of the report reads "Input 5/23/08". This was the date that the circuit quantities were keyed to a Microsoft ACCESS database for use by the Windstream East TELRIC models.
- e. See Response to Data Request #66(d).
- f. A replacement copy of the report for SHDNKYXA is attached hereto as Exhibit N, DR68f_SHDNKYXA_Facilities by Rate Code.pdf. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.

Windstream East Party Supporting the Response: David Blessing

69. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_facility count by exch.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., ARTNKYXA, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #68(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #68(b).
 - b. Using the data for the first exchange found in the report, i.e., ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

70. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_ASAP_High Cap By Exchange.pdf," please respond to the following requests.
- a. Please describe the system that is the source of this report.
 - b. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please explain the meaning of each reported numerical amount. In addition, explain all possible values for "Juris".
 - c. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please explain the meaning of the reported CLLI codes. Do these CLLI codes identify the "A" and the "Z" locations of a circuit, i.e., the end points of a circuit?
 - d. The handwritten note found at the bottom of the second page of the report is illegible. Please provide a legible copy of this page and explain this note.
 - e. The handwritten note found at the top of the first page of the report is illegible. Please provide a legible copy of this page and explain this note.
 - f. Using the data for the first exchange found in the report, i.e., ALBYKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.
 - g. A note on the bottom of page 209 of the pdf file says "pages 1-232 not printed". Please provide these pages and explain why these pages were not printed.

RESPONSE:

- a. See Response to Data Request #66(a).
- b. On the file entitled "KY219_ASAP_High Cap by Exchange.pdf" each circuit is listed individually. This equates to an In Service Number of Circuits of "1" for each circuit. Albany KY (ALBYKYXA) has a total of 30 High Cap circuits. The quantities contained in the TELRIC Totals box at the bottom summarizes the DS1 and DS3 circuits as: Interexchange DS3's (0), Interexchange DS1's (22), Local DS3's (0) and Local DS1's (8) for an Exchange DS1 and DS3 Total of 30. Industry standard Jurisdiction codes are utilized: 1 = InterState/InterLATA, 2 = IntraState/InterLATA, 3 = InterState/IntraLATA, 4 = IntraState/IntraLATA, 5 = Local Exchange, 6 = Local Interexchange and 0 = N/A or Multiple.
- c. The reported Circuit ID's are in standard CLS Format (Serial Number) and the CLLI Codes listed under the Heading "Exchange CLLI's" do identify the "A" and "Z" locations of the circuit.
- d. See Response to Data Request #66(c). Exhibit O, DR70d_ALBYKYXA_DS1 or DS3 - High Cap Detail_page 2.pdf attached hereto contains a more legible copy

of this page. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.

- e. See Response to Data Request #66(c). Exhibit O, DR70e_ALBYKYXA_DS1 or DS3 – High Cap Detail_page 1.pdf attached hereto contains a more legible copy of this page. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- f. See Response to Data Request #66(d).
- g. Only the High Capacity DS1 and DS3 circuit totals are needed for the study. Therefore, the 232 unnecessary pages listing the Lexington circuit details were not printed when the data was downloaded. It is a time sensitive report and cannot be reproduced today with the same results.

Windstream East Party Supporting the Response: David Blessing

71. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_ASAP_high cap by exchange.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., ARTNKYXA, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #70(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #70(b).
 - b. Using the data for the first exchange found in the report, i.e., ARTNKYXA, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

72. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_Loop Summary Table rpt.pdf," please respond to the following requests.
- a. Please describe the system that it's the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., Albany, please explain the meaning of each reported numerical amount.
 - c. Please explain the meaning of the handwritten amounts found in the report for Albany.
 - d. Please explain the meaning of the handwritten "N/A" found on the first page of the report.
 - e. Using the data for the first exchange found in the report, i.e., Albany, please provide the mapping for each reported numerical amount in this report to the specific cells(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. See Response to Data Request #66(a).
- b. The Quantity column is the number of 2-wire and 4-wire Interexchange (IX) and Local circuits in the Albany, KY exchange. These quantities were keyed to a Microsoft ACCESS database for use by the Windstream East TELRIC models.
- c. The handwritten "Reduce POTS Lines by -16" is the sum of the 2-wire Analog, 4-wire Analog, 2-wire Digital, 4-wire Digital, 2-wire ISDN and 4-wire ISDN circuits in Albany. This count is deducted from the adjusted Albany Access Line quantities on the "Monthly Totals by Exchange" report to arrive at POTS lines.
- d. There was a quantity of two (2) 4-wire DS-1 circuits listed at the beginning of this report that had no identifiable exchange associated with them. The handwritten "N/A" designates that these two circuits were not included in the study.
- e. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

73. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Loop Summary table rpt.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #72(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #72(b).
 - b. Please explain the handwritten notes found at pages 1, 3, and 12 of the report.
 - c. Using the data for the first exchange found in the report, i.e., Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. The two (2) 4-wire DS-1 circuits listed at the beginning of the report that had no identifiable exchange associated with them were reassigned. One was moved to the Cumberland exchange on Page 5. The other was moved to the Shopville exchange on Page 12. There are no handwritten notes on Page 3.
- c. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

74. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_monthly totals by exch_access lines.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., Albany, please explain the meaning of each reported numerical amount. This explanation should decode the "Line Types".
 - c. Please explain the meaning of the handwritten amounts found in the report for Albany.
 - d. Please explain the meaning of the faint note on the first page that appears to be a date.
 - e. Using the data for the first exchange found in the report, i.e., Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. **MIRROR** – Windstream East's MIRROR (Mechanized Inventory Records Reconciliation) system is the source for Access Lines by Type on this report.
- b. The numeric values under "Quantity" are the total Access Lines by each specific Line Type in the exchange. See Exhibit P, DR74b_Access Line Type_definitions.pdf for a listing of valid Access Line Types. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.

c. 1

This information is subject to the Petition for Confidential Treatment filed simultaneously herewith.

- d. The note on the first page reads "Input 5/27/08" and designates the date the POTS line quantities were keyed to a Microsoft ACCESS database for use by the Windstream East TELRIC models
- e. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

75. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Monthly Totals by Exch_Access Lines.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #74(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #74(b).
 - b. Please explain why no handwritten adjustments have been made to Arlington comparable to the handwritten adjustments for Albany.
 - c. Please explain the handwritten adjustments shown for London, Mount Olivet and White Lily.
 - d. Using the data for the first exchange found in the report, i.e., Arlington, please provide the mapping for each reported numerical amount in the report to the specific cell(s) in the Excel workbooks that Windstream Kentucky east provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. Rather than make adjustment notations on the body of the report, the person calculating the POTS lines simply made the calculation and entered the adjusted quantities into the Microsoft ACCESS database.
- c. On Page 8, Line Types B11 (WATS out) and B12 (800 service) were adjusted out of Access Lines for the London exchange. On Page 9, Line Type B18 (Test Line) was adjusted out of Access Lines. On Page 12, the above adjustments were adjusted out of Total Access Lines.
- d. See Response for Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

76. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY219_Summarize electronic data.pdf," please respond to the following requests.
- a. Please describe the database, "Interexchange.mdb", that is the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., Albany, please explain the meaning of each reported numerical amount.
 - c. Please explain the meaning of the handwritten amounts found on the last page of the report.
 - d. Using the data for the first exchange found in the report, i.e., Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. The source for this report, the Interexchange database, is a Microsoft ACCESS database that houses quantities for trunks, loops and facilities by exchange when they are downloaded from the ASAP application. It also houses the interexchange detailed cable records.
- b. The "Add Switching" section reports the voice grade circuit totals by circuit type and calculates a Common/Dedicated percentage. The "Loops" section reports 1) the Local (Central Office to the customer premises) circuit totals by circuit type followed by an average Local Loop length by circuit type which is NOT used in the study and 2) the Interexchange (IX - Central Office to Central Office or Central Office to meet point) circuit totals by circuit type. The "IX Terms" section reports 1) the Interexchange Channel Mileage Termination (CMT) totals by circuit type along with the calculated material cost for these CMTs and 2) the Circuit Termination (CT) totals by circuit type followed by the calculated material cost for these CT's.
- c. The handwritten notes on the last page of the report are the calculated Total IX Fiber Facility dollars and Loop Fiber Facility dollars for all listed exchanges.
- d. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

77. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY220_Summarize Electronic data.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #76(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #76(b).
 - b. Using the data for the first exchange found in the report, i.e., Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. See Response to Data Request #66(d).

Windstream East Party Supporting the Response: David Blessing

78. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Please explain the relationship of the data contain [sic] in the file "KY219_Summarize Electronic data.pdf" to data found in each of the following files:

- a. KY219_ASAP_channel usage by exch.pdf,
- b. KY219_ASAP_facility count by exch.pdf,
- c. KY219_ASAP_High Cap By Exchange.pdf,
- d. KY219_Loop Summary table rpt.pdf, and
- e. KY219_monthly totals by exch_access lines.pdf.

1) **RESPONSE:** The "ASAP channel usage by Exchange" report, "ASAP Facility count by exchange" report, "ASAP High Cap By Exchange" report and "Loop Summary Table Report" are the original source documents for all trunks, local loop and IX termination quantities used in the study while the "Monthly Totals by Exchange" report furnishes the POTS lines used in the study. These reports are the source for the quantities listed in file "KY219_Summarize Electronic data.pdf."

Windstream East Party Supporting the Response: David Blessing

79. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Please explain the relationship of the data contain [sic] in the file "KY220_Summarize Electronic data.pdf," to data found in each of the following files:
- a. KY220_ASAP_channel usage by exch.pdf,
 - b. KY220_ASAP_facility count by exch.pdf,
 - c. KY220_ASAP_high cap By exchange.pdf,
 - d. KY220_Loop Summary table rpt.pdf, and
 - e. KY220_Monthly Totals by Exch_Access Lines.pdf.

RESPONSE: See Response to Data Request #78.

Windstream East Party Supporting the Response: David Blessing

80. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY East_Lexington IX Fiber Cables.pdf," please respond to the following requests.
- a. Please describe the system that is the source for this report.
 - b. Using the data for the first exchange found in the report, i.e., Albany, please explain the meaning of each reported numerical amount.
 - c. Please explain the meaning of the note found immediately above the Albany exchange data.
 - d. Using the data for the first exchange found in the report, i.e., Albany, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. The source system for this table was Windstream East's CAD/E system, an engineering database containing the company's outside plant facilities data.
- b. The numbers under the "Size" column refer to the number of fibers in the cable. A size is repeated when the same size appeared more than once in the database for that exchange, such as when there were different vintage years or more than one interexchange route. The numbers under the column titled "Footage" refer to the length of each size of cable in sheath feet. The "Sub-total" line provides the sum of the sheath feet and route miles of interexchange cable for that exchange.
- c. The note above the Albany exchange data does not apply to the current study since only transport costs are developed.
- d. The total amounts in the Footage column for each WOMS Code description equals the Length amount for the same code listed on the "IX Facilities Detail" page in Windstream East's ATTACHMENT B. Additional source detail supporting the cable amounts for the Albany Exchange was provided in Windstream East's Response to AT&T Mobility's First Data Request #33.

Windstream East Party Supporting the Response: David Blessing

81. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #9 a number of documents, collectively referred to as Exhibit B, which Windstream Kentucky East describes as "additional cost study support materials." Regarding the file titled "KY East_London IX Fiber Cables.pdf," please respond to the following requests.
- a. Using the data for the first exchange found in the report, i.e., Arlington, would Windstream Kentucky East's response be the same as its response to AT&T Mobility's Second Data Request #80(b)? If not, describe anything that would be different to its response to AT&T Mobility's Second Data Request #80(b).
 - b. Using the data for the first exchange found in the report, i.e., Arlington, please provide the mapping for each reported numerical amount in this report to the specific cell(s) in the Excel workbooks that Windstream Kentucky East provided consistent with its response to AT&T Mobility's First Data Request #1.

RESPONSE:

- a. Yes.
- b. Yes, except that detail for Arlington was not provided in Windstream East's Response to AT&T Mobility's First Data Request #33.

Windstream East Party Supporting the Response: David Blessing

82. Windstream Kentucky East attached to its response to AT&T Mobility's First Data Request #11 says that expenses associated with service order activities have not been removed from Windstream's maintenance factor inputs. Maintenance factors are developed in the "Cost Factors" worksheet of Windstream's cost study.
- a. Please admit or deny that Windstream's response regarding expenses associated with service order activities refers to the amounts found in cells F9, F10, F11, F12 and F13 in the "Cost Factors" worksheet in the Excel file titled "Windstream Kentucky East RecipComp Study_2009.xls." Windstream should respond with respect to each individual amount if the response varies across the referenced cells. Furthermore, if Windstream's response is to deny, Windstream should identify the specific cells in the Excel version of its cost study that support its response to AT&T Mobility's First Data Request #11.
 - b. What are the vintages of the current investments and current expenses (cells E9, E10, E11, E12 and E13, and F9, F10, F11, F12 and F13 in the "Cost Factors" worksheet) used to develop Windstream's maintenance factors.
 - c. Please provide Windstream Kentucky East's end-of-period balances for 2006, 2007, 2008 and September 2009 for the following plant accounts:
 - i. Account 2210 (Central office-switching)
 - ii. Account 2212 (Digital electronic switching)
 - iii. Account 2230 (Central office-transmission)
 - iv. Account 2232 (Circuit equipment)
 - v. Account 2410 (Cable and wire facilities)
 - vi. Account 2411 (Poles)
 - vii. Account 2421 (Aerial cable)
 - viii. Account 2422 (Underground cable)
 - ix. Account 2423 (Buried cable)
 - x. Account 2426 (Intrabuilding network cable)
 - xi. Account 2431 (Aerial wire)
 - xii. Account 2441 (Conduit systems)
 - xiii. Copper cable portion of Account 2421
 - xiv. Copper cable portion of Account 2433
 - xv. Copper cable portion of Account 2423
 - d. Please provide Windstream Kentucky East's account balances for 2006, 2007 and 2008 and for the first nine months of 2009 for the following accounts:
 - i. Account 6210 (Central office switching expense)
 - ii. Account 6212 (Digital electronic expense)
 - iii. Account 6230 (Central office transmission expense)
 - iv. Account 6232 (Circuit equipment expense)
 - v. Account 6410 (Cable and wire facilities expenses)
 - vi. Account 6411 (Poles expense)
 - vii. Account 6421 (Aerial cable expense)

- viii. Account 6422 (Underground cable expense)
- ix. Account 6423 (Buried cable expense)
- x. Account 6426 (Intrabuilding network cable expense)
- xi. Account 6431 (Aerial wire expense)
- xii. Account 6441 (Conduit systems expense)
- xiii. Copper cable expense portion of Account 6421
- xiv. Copper cable expense portion of Account 6422
- xv. Copper cable expense portion of Account 6423
- e. Please provide Windstream Kentucky East's connect and disconnect service order counts for 2006, 2007 and 2008 and for the first nine months of 2009 for the following customer groups:
 - i. All customers
 - ii. Only retail customers
 - iii. IXC customers
 - iv. Customers purchasing intrastate services
 - v. Customers purchasing interstate services
 - vi. CLEC customers
- f. Please provide Windstream Kentucky East's counts of newly connected access lines and disconnected access lines for 2006, 2007 and 2008 and for the first nine months of 2009.
- g. Please provide Windstream Kentucky East's counts of newly connected access lines and disconnected access lines for 2006, 2007 and 2008 and for the first nine months of 2009 for the following circuit types:
 - i. DS0 loops
 - ii. DS1 loops
 - iii. DS3 loops
 - iv. SONET (i.e., STS1, OC3, OC12, etc.) loops
 - v. DS0 transport
 - vi. DS1 transport
 - vii. DS3 transport
 - viii. SONET transport
- h. Please provide Windstream Kentucky East's most recent cost analysis or study for provisioning (connecting and disconnecting) exchange access lines.
- i. Please provide Windstream Kentucky East's most recent cost analysis or study for provisioning (connecting and disconnecting) private line or special access lines.
- j. Please identify all network groups involved with provisioning activities for Windstream Kentucky East initiated by customer connection requests.
- k. Please identify all network groups involved with provisioning activities for Windstream Kentucky East initiated by customer disconnection requests. Also, provide an hourly labor rate for each reported work group that Windstream uses in its ordinary course of business for Kentucky.

RESPONSE:

- a. Windstream East objects to this subquestion (a) on the basis that the costs in question are insignificant and not readily identifiable in Windstream East's financial records and are therefore irrelevant and not likely to lead to discoverable information in this proceeding.
- b. The vintage used to develop Windstream East's maintenance factors was 2007.
- c. Plant account balances are provided in Exhibit "DR82_KY East Account Balances.xls" attached herein as Exhibit Q. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- d. Expense account balances are provided in Exhibit "DR82_KY East Account Balances.xls" attached herein as Exhibit Q. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- e. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- f. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- g. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- h. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- i. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- j. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.
- k. Windstream East objects to this portion of the request as not being relevant to the forward-looking costs developed in Windstream East's cost study.

Windstream East Party Supporting the Response: David Blessing

83. Windstream Kentucky East has not made any forward-looking adjustment to current maintenance and joint factors, although Windstream claims through its response to AT&T Mobility's First Data Request #12 to have ensured its costs are forward-looking.
- a. What are the vintages of the current investments and current expenses (cells E14, E15, E16, and E17, and F14, F15, F16 and F17 in the "Cost Factors" worksheet) used to develop Windstream's joint factors.
 - b. Please provide Windstream Kentucky East's end-of-period balances for 2006, 2007 and 2008 and September 2009 that correspond to the investments found in cells E14, E15, E16 and E17 in the "Cost Factors" worksheet.
 - c. Please provide Windstream Kentucky East's account balances for 2005, 2007, 2008 and the first nine months of 2009 that correspond to the expenses found in cells F14, F15, F16 and F17 in the "Cost Factors" worksheet.
 - d. Please provide Windstream Kentucky East's most recent current-to-book ratios for the investment accounts associated with cells E9, E10, E11, E12, E13, E14, E15, E16, E17, E19, E20, E21 and E22, identify the vintage of each ratio and describe the method of developing those ratios.
 - e. If Windstream Kentucky east is unable to provide the current-to-book ratios requested in AT&T Mobility's Second Data Request #83(e), then please provide the following information for each account for which current-to-book ratios are not provided:
 - i. Windstream Kentucky East's most recent depreciation study, and
 - ii. The current remaining plant in service for each plant vintage from 1989 to 2008.

RESPONSE: Windstream East objects to this request to the extent that it states a legal opinion. Without waiving its objection, Windstream East provides the following response:

- a. The vintage used to develop Windstream East's joint factors was 2007.
- b. Investment balances are provided in Exhibit "DR83_KY East Joint Balances.xls" attached herein as Exhibit R. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- c. Expense balances are provided in Exhibit "DR83_KY East Joint Balances.xls" attached herein as Exhibit R. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- d. Current-to-book ratios are not developed by Windstream East for its cost studies and are therefore not available.
- e. Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding.

Windstream East Party Supporting the Response: David Blessing

84. Windstream Kentucky East in its response to AT&T Mobility's First Data Request #19 provides a list of switching investment items that are treated as non-usage sensitive. Please identify the specific cells in the cost study that contain these switching investment items.

RESPONSE: The listed switching investment items are found as column headings on the "Switch Cost Data" pages (pages 4 through 7) of ATTACHMENT C and ATTACHMENT D. Cell references from the electronic files provided to AT&T Mobility are as follows:

- a. LCE's, LCM's, Dwrs, & Lines – Cells E5 and E21 (The description in Cell E21 should read "LCE's, LCM's, Dwrs, & Lines.")
- b. MDF and Protector – Cells O5 to Q5 and cells O21 to Q21
- c. Conversion Costs – Cells M5 and M21
- d. Power equipment – Cells S5 and S21

Windstream East Party Supporting the Response: David Blessing

85. Windstream Kentucky east provided an Excel spreadsheet titled “AT&T.Exh.F.DR26a.xls” attached to its response to AT&T Mobility’s First Data Request #26. The following queries are with respect to this document.
- a. Please explain the meaning and role of the amounts in the “Alloc” column found in tabs WP7.1, WP7.3 and WP7.4.
 - b. Please provide all documents supporting items on tab WP5.4 having “Forward Looking Engineering Estimate” as its source.

RESPONSE:

- a. The “Alloc” column is used to show what portion of the equipment described in column (A) is required for the level of service being developed.
- b. The referenced factors are not used to develop the Material Cost inputs for Windstream East’s cost study and therefore Windstream East objects to this question as not being reasonably calculated to lead to the discovery of admissible evidence and/or seeks information not relevant to the claims asserted by AT&T Mobility in this matter.

Windstream East Party Supporting the Response: David Blessing

86. Windstream Kentucky East provided an Excel spreadsheet titled “AT&T.Exh.G.DR26b.xls” attached to its response to AT&T Mobility’s First Data Request #26. The following queries are with respect to this document.
- a. Please provide all supporting documents for the amounts found in tab “MDF RR Cable Rack Fuse SYSCosts”.
 - b. Please provide the source documents mentioned on row 73 in tab “Units and Parts with Discount”.
 - c. Please explain the meaning of “NL Cost” and “ACP” as found on tab “NTT 15th & M DACS Cost”.
 - d. Please provide all supporting documents for the embedded values used to calculate “Item Cost w/ACP”, “Freight Cost”, and “Sales Tax” as found on tabs “DS-3 to OC48 via an FW4500” and “NTT 15th & MDACS Cost”.
 - e. Please explain the meaning of the highlighting found on tabs “DS-3 to OC48 via an FW4500” and “NTT 15th & M DACS Cost”.

RESPONSE:

- a. Document “AT&T.Exh.G.DR26b.xls” is the supporting document for termination equipment price inputs to the cost model. The data in the document was provided by Windstream East engineering based on review of closed jobs and locally maintained price lists.
- b. The source note refers to another worksheet in document “AT&T.Exh.G.DR26b.xls”, using the original file name. The source note does not belong on the referenced sheet and should be ignored.
- c. “NL Cost” means “non-loaded cost”. Amounts do not include the Windstream Communications Products processing and handling charge which is added in column H. “ACP” refers to Windstream Communications Products, the Windstream subsidiary responsible for procurement of materials and supplies used in the construction and maintenance of network facilities.
- d. The rates used are standard values in the Windstream East job cost system for the job from which the detail was taken. The rate used for “Item Cost w/ACP” is the amount for Windstream Communications Products processing and handling per a set rate. The rate for “Freight Cost” is the job cost standard rate which is used unless actual freight costs are known. The “Sales Tax” rate was not included in the material price development since the sales tax is added later using the correct sales tax rate for the study area.
- e. The highlights provide a visual reference to amounts which are used as price inputs to document “AT&T.Exh.G.DR26a.xls”. Color differences help to identify underlying detail line items used in the cost development at the bottom of the sheet. The document “AT&T.Exh.G.DR26a.xls” page and line references are highlighted in yellow.

Windstream East Party Supporting the Response: David Blessing

87. Windstream Kentucky east provided an Excel spreadsheet titled "AT&T.Exh.H.DR32.xls" attached to its response to AT&T Mobility's First Data Request #32. Please explain the meaning of "10M STRAND" as mentioned in this document.

RESPONSE: The term "10M Strand" refers to the 3/8 inch strand cable which is used to support aerial cables.

Windstream East Party Supporting the Response: David Blessing

88. Windstream Kentucky East's response to AT&T Mobility's First Data Request #33 states that "cables less than 24 fibers were changed to 24-fibers". Provide all documents relied upon by Windstream to support this adjustment as needed for a "forward-looking network design".

RESPONSE: The 24-fiber requirement for the forward-looking network was established by Windstream East engineering as the most long run cost efficient size available.

Windstream East Party Supporting the Response: David Blessing

89. Windstream Kentucky east provided an Excel spreadsheet titled "DR40_MDF Power Transmission Worksheet.xls" aka "AT&T.Exh.K.DR40.xls" attached to its response to AT&T Mobility's First Data Request #40. The following queries are with respect to this document.
- a. Provide the CS1500 Order Form mentioned on tab "Worksheet". Also, provide any documentation explaining its proper use.
 - b. Provide all supporting documents for the "inst" factor used on line 5 of tab "Worksheet".
 - c. Provide all supporting documents for the "line conversion costs" found on line 22 of tab "Worksheet".
 - d. Provide all supporting documents for the "loading" factor used on line 25 of tab "Worksheet".
 - e. Provide all supporting documents for the "misc inst" factor used on line 33 of tab "Worksheet".
 - f. Provide all supporting documents for the "loading" factor used on line 35 of tab "Worksheet".
 - g. Identify the equipment associated with the "SS7 Costs" found on line 32 of tab "Worksheet".
 - h. Provide all supporting documents for all "input" items including embedded loading factors found in tab "MDF Investment".
 - i. Provide all supporting documents for all "input" items found in tab "Power Investment".

RESPONSE:

- a. The CS1500 Order form is provided, subject to Non-Disclosure Agreement, as Exhibit "DR89a_CS1500 Order Form Model 1_V3.pdf" attached herein as Exhibit S. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.
- b. The installation factor ("inst") is the factor generally used by Windstream East for budgeting purposes. Additional support is not available.
- c. The line conversion costs came from an older switching model for which support data is not available.
- d. The loading factor covers Windstream East engineering, posting records, freight, sales tax, Interest During Construction (IDC), miscellaneous minor materials, and some additional installation labor provided by Windstream employees. Additional support is not available.
- e. See Response to Data Request #89(b).
- f. See Response to Data Request #89(d).
- g. The SS7 equipment includes hardware and software installed at the host switch in order to provide SS7 signaling capability.
- h. Support documentation and pricing detail is not available.
- i. See Response to Data Request #89(h).

Windstream East Party Supporting the Response: David Blessing

90. Windstream Kentucky East's response to AT&T Mobility's First Data Request #44 states Windstream's cost study used a Nortel CS1500 soft switch platform. Given that Windstream apparently does not currently use soft switches in its Kentucky public switched network, explain why it is reasonable to model costs based on a soft switch platform for Kentucky East. In addition, provide any analyses performed by Windstream that supports using a soft switch platform rather than a digital circuit switch platform in its cost study.

RESPONSE: The FCC rules require use of a forward-looking switch design in the cost study. In the judgement of Windstream East engineers, the Nortel CS1500 meets the commission's standard.

Windstream East Party Supporting the Response: David Blessing

91. Windstream Kentucky East's response to AT&T Mobility's First Data request #45 states the "capacity limit of the CS1500 switch used in Windstream East's model is 48,000 lines". Provide all documents relied upon by Windstream to determine this capacity.

RESPONSE: Capacity support documentation is provided in Exhibit "DR91_CS1500 Capacity.xls" attached herein as Exhibit T. A Petition for Confidential Treatment of this Exhibit is filed simultaneously herewith.

Windstream East Party Supporting the Response: David Blessing

92. Windstream Kentucky East provided an Excel spreadsheet titled "DR46_Windstream Capital Loadings_COE_2006.xls" aka "AT&T.Exh.L.DR46.xls" attached to its response to AT&T Mobility's First Data Request #46, which provides an analysis of all closed switch jobs in 2006. The following queries are with respect to this document.
- a. Identify all jobs that involved a new switch or a switch replacement and identify the booked value of the associated switch investment.
 - b. Identify all jobs that involved soft switching equipment replacement and identify the booked value of the associated switch investment.
 - c. Explain the meaning of "Direct Costs 4405 to 4590" and "Engineering 4930".
 - d. Explain the meaning of "Reused Equipment".
 - e. Explain how "Allocated Engineering" and "Allocated Supervision" are determined, and provide supporting documentation.
 - f. What interest rate is used for determining Interest During Construction?
 - g. Provide all documents supporting the "Minor Material Loading" factor.

RESPONSE:

- a. None.
- b. None.
- c. The caption "Direct Costs 4405 to 4590" refers to charges to the subaccounts used for all types of switching and circuit equipment investment. The caption "Engineering 4930" refers to charges to the subaccount used for capitalized central office engineering.
- d. "Reused Equipment" refers to equipment which has been re-located from one exchange location to a different exchange location. Amount is for the original material costs since original installation costs are retired and re-installation costs are capitalized.
- e. "Allocated Engineering" is determined by spreading capitalized engineering amounts over the direct labor and material costs of a job. This is done through an allocation program within the Windstream financial system whereby capitalized engineering costs are allocated over the eligible job costs, and then charged to the individual jobs on a monthly basis. "Allocated Supervision" is determined by spreading supervision amounts over the direct labor costs charged to a job. This is done through an allocation program within the Windstream financial system whereby supervision costs are collected and allocated over all direct expense and capital labor hours of supervised employees. The capital amounts are then charged to the individual jobs on a monthly basis. The amounts on the spreadsheet came from a summarization of thousands of records. Any additional documentation would require an on-site visit.
- f. Interest During Construction is determined based on the average cost of borrowing for the corporation.
- g. The Windstream Job Cost system used standard amounts for minor materials and freight during the 2006 time period in which the underlying job cost amounts were

incurred. The total for these two items was used to extract an appropriate amount of costs from the line items where such costs had been lumped with contract labor and purchased materials.

Windstream East Party Supporting the Response: David Blessing

93. Given Windstream Kentucky East's Response to AT&T Mobility's First Data Request #51 in which Windstream identified no soft switch it operates is connected to the public switched network, explain what actual experience Windstream has for operating soft switches connected to the public switched network.

RESPONSE: Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding.

Windstream East Party Supporting the Response: David Blessing

94. Given Windstream Kentucky East's Response to AT&T Mobility's First Data Request #52, identify product management (Account 6611) activities and expenses Windstream could avoided [sic] if transport and termination associated with reciprocal compensation were not provided in Kentucky.

RESPONSE: No documents or analyses exist that are responsive to this request.

Windstream East Party Supporting the Response: David Blessing

95. Given Windstream Kentucky East's Response to AT&T Mobility's First Data Request #53, identify sales and advertising (Accounts 6612 and 6613) activities and expenses Windstream could have avoided if transport and termination associated with reciprocal compensation were not provided in Kentucky.

RESPONSE: No documents or analyses exist that are responsive to this request.

Windstream East Party Supporting the Response: David Blessing

96. Given Windstream Kentucky East's Response to AT&T Mobility's First Data Request #54, identify customer services (Account 6623) activities and expenses Windstream, excluding activities associated with customer service order requests, could avoid if transport and termination associated with reciprocal compensation were not provided in Kentucky.

RESPONSE: No documents or analyses exist that are responsive to this request.

Windstream East Party Supporting the Response: David Blessing

97. Given Windstream Kentucky East's Response to AT&T Mobility's First Data Request #54, what expense accounts are associated with (a) setting up and maintaining of reciprocal compensation customer accounts, (b) maintaining usage records for reciprocal compensation customers, (c) billing and collection costs for reciprocal compensation customers, and (d) inquiries made by reciprocal compensation customers. In addition, provide the 2008 booked amounts for each of these categories.

RESPONSE: Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding.

Windstream East Party Supporting the Response: David Blessing

98. Windstream Kentucky East provided in response to AT&T Mobility's First Data Request #60 a 2009 demand forecast for each MOU category used in its cost study. The following queries are with respect to this forecast.
- a. Provide all documents relied upon by Windstream to develop this forecast.
 - b. Explain how Windstream was able to develop this forecast without the reliance on all of the historical information AT&T Mobility requested in AT&T Mobility's First Data Request #2.

RESPONSE:

- a. The Windstream East cost study used historical information and forward-looking assumptions to determine minute of use trends.
- b. The forecasted percents provided (see Response to Data Request #98(a)) were entered in the study to arrive at the forecasted 2009 demand for toll and reciprocal compensation minutes. The Local, EAS, Tandem, and Host/Remote minutes were not included in the forecast. The forecast for these demand categories was developed using weighted values of the forecasts for toll and reciprocal compensation minutes. See the formulas found on Lines 19-20 and 29-30 in the "Demand" worksheet in the native Excel version of Windstream East's cost study.

Windstream East Party Supporting the Response: David Blessing

99. Describe how Windstream's study determines what percentage of the Nortel CS1500 modeled switches are not involved in the termination of voice traffic from wireless and wireline providers.

a. What is that percentage?

RESPONSE: The Windstream East model determines the portion of the Nortel CS1500 switch equipment that is not involved in the termination of voice traffic through categorization of the switch components. Equipment that is entirely not used for termination of voice traffic (port and line termination equipment) is excluded from development of traffic-sensitive costs.

a.

This information is subject to the Petition for Confidential Treatment filed simultaneously herewith.

Windstream East Party Supporting the Response: David Blessing

100. Describe how Windstream's study determines what percentage of interoffice cable costs to allocate to uses other than the transport of voice traffic from wireless and wireline providers.

a. What is that percentage?

RESPONSE: The Windstream East study determines the percentage of cable costs to allocate to uses other than the transport of voice traffic based on use of a historical percentage.

a. This information is subject to the Petition for Confidential Treatment filed simultaneously herewith.

Windstream East Party Supporting the Response: David Blessing

101. Describe how Windstream's study determines total demand and utilization of the transport network.
- a. What is that total demand in DS0 equivalents?
 - b. Describe how total demand determined in Windstream's study includes all voice trunks and special circuits of varying bandwidth.
 - c. In determining total demand, does Windstream's study treat a special broadband circuit as the equivalent of a single voice grade circuit?
 - i. If not, explain how Windstream's study treats such circuits differently.

RESPONSE:

- a. Windstream East's cost study does not develop total demand in DS0 equivalents. Total demand in the Windstream East cost study is developed in terms of minutes of use.
- b. See Response to Data Request #101(a).
- c. See Response to Data Request #101(a).

Windstream East Party Supporting the Response: David Blessing

102. As follow-up to AT&T Mobility's First Data Request #13, AT&T Mobility request information regarding "booked" costs associated with the following components used by Windstream Kentucky East to develop its "forward-looking" switching and transport costs:
- a. Based on the level of detail found in tab "IX Facilities Detail" of the workbook "IX Facilities_KYEast.xls", provide for each requested period "materials" and "install cost" along with "length" for jobs completed in 2006, 2007 and 2008 and the first nine months of 2009. In addition, identify the account associated with each "booked" cost (i.e., investment).
 - b. If information is not available, as requested in subpart (a), please fully explain why such information is not available in each instance and provide the information that most closely matches the "booked" data requested in subpart (a) (i.e., the "materials" and "install cost" information). In addition, if "length" information is not available at the same level of granularity as the "materials" and "install cost" information, provide the "length" information at the most granular level available consistent with the detail found in tab "IX Facilities Detail".
 - c. Based on the level of detail found under columns C-I and L-R in tab "IX Fiber Equip \$" of the workbook "Electronics Input_KYEast_09.xls", provide for each requested period the number of installed equipped circuits corresponding to each column from C to I and the "booked" circuit equipment investment corresponding to each column from L to R for jobs completed in 2006, 2007, 2008 and the first 9 months of 2009. In addition, identify the account associated with each "booked" cost (i.e., investment".
 - d. If information is not available, as requested in subpart (c), please fully explain why such information is not available in each instance and provide the information that most closely matches the "booked" circuit equipment investment requested in subpart (a) for each exchange.

RESPONSE: Windstream East objects to this request as not being relevant to the forward-looking costs developed in Windstream East's cost study. Actual booked investment values were not used to develop the investment inputs to the study and creation of such would create an unnecessary burden on Windstream East.

Windstream East Party Supporting the Response: David Blessing

103. Windstream Kentucky East states in its response to AT&T Mobility's DR #16 that (a) switch processor and matrix costs, and (b) initial software and software upgrade costs "are treated as traffic-sensitive in Windstream East's cost study". Please provide all studies or analyses relied upon by Windstream to support this treatment.

RESPONSE: In preparing its response to AT&T Mobility's First Data Request #16, Windstream East relied on FCC rules and determinations found in the Commission's rules and orders related to the Cost-Based Pricing Methodology as it applies to section 252(d)(2).

Windstream East Party Supporting the Response: David Blessing

104. Windstream Kentucky East in its response to AT&T Mobility's DR #18 that eight switches [sic] listed in its cost study are not capable of performing switching. Please explain why it is efficient that these switches are not capable of performing switching.

RESPONSE: Windstream East objects to this request since the purpose of such information is vague and not likely to lead to any relevant or discoverable information in this proceeding.

Windstream East Party Supporting the Response: David Blessing

Date: 11/3/09

Respectfully Submitted,

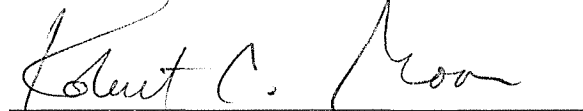
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 3rd day of November, 2009 on Jeff R. Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615 and by first class mail, postage pre-paid on Mary K. Keyer, General Counsel/AT&T Kentucky, 601 West Chestnut Street, Room 407, Louisville, Kentucky 40203, on Paul Walters, Jr., 15 East 1st Street, Edmond, Oklahoma 73034, and on Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615.



Robert C. Moore

ATTACHMENT N-T

REDACTED