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January 13, 2009

**PLEASE NOTE THAT THE ORIGINAL OF THIS FILING
CONTAINS CONFIDENTIAL COMMERCIAL INFORMATION**

Via Hand-Delivery

Mr. Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

JAN 13 2010

PUBLIC SERVICE
COMMISSION

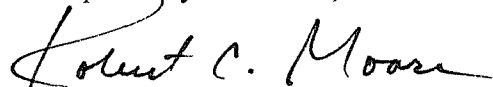
Re: Petition of Windstream Kentucky East, LLC ("Windstream") for Certification of an Interconnection Agreement with New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility
Case No. 2009-00246

Dear Mr. Derouen:

Please find enclosed for filing in the above referenced case the original and five (5) copies of Windstream Kentucky East, LLC's Second Amendment to its Supplemental Responses to New Cingular Wireless PCS, d/b/a AT&T Mobility's First and Second Data Requests to Windstream Kentucky East, LLC ("Second Amendment to Supplemental Responses"). Exhibits "A" and "B" to Windstream's Second Amendment to Supplemental Responses contains confidential commercial information and Windstream files herewith its Petition for Confidential Treatment of Exhibits "A" and "B" pursuant to 807 KAR 5:001, Section 7. Please note that Exhibits "A" and "B" have been redacted from the 5 copies of Windstream's Second Amendment to Supplemental Responses, but the original of the Second Amendment to Supplemental Responses contains an unredacted copy of Exhibits "A" and "B". The copy of the Second Amendment to Supplemental Responses served upon New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility on this date also contains the confidential commercial information.

Please call me if you have any questions concerning this filing, and thank you for your attention to this matter.

Respectfully submitted,


Robert C. Moore

RCM/db
Enclosures
cc: Stacy Majors

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Petition of Windstream Kentucky)
East, LLC for Arbitration of an)
Interconnection Agreement with New)
Cingular Wireless PCS, LLC, D/B/A)
AT&T Mobility)

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Case No. 2009-00246
PUBLIC SERVICE
COMMISSION

**WINDSTREAM KENTUCKY EAST, LLC'S
PETITION FOR CONFIDENTIAL TREATMENT**

Comes Windstream Kentucky East, LLC (“Windstream East”), by counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission (“Commission”) for an order granting confidential treatment to Windstream East’s Exhibits attached to its Second Amendment to its Supplemental Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility’s First and Second Data Requests (“Second Supplemental Responses”). In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for Exhibits A and B attached to its Second Amended Supplemental Responses. Those Exhibits contain proprietary, confidential information that would aid competitors of Windstream East if released, and such confidential and proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870 et seq.

2. Providers of the services offered by Windstream East, including wireless, retail and wholesale telephone services and telephone-related services, operate in a highly competitive marketplace where such confidential information is closely guarded to insure it is not disclosed to competitors.

3. This information is not generally disclosed to non-management employees of Windstream and is protected internally by Windstream as confidential and proprietary information.

4. The disclosure of the confidential and proprietary information contained in Exhibits A and B would result in significant or irreparable harm to Windstream East by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information and the regulations of the Commission contemplate the filing of such information under a confidentiality order.

5. Windstream East seeks confidential treatment for the entirety of Exhibits A and B because all of the information contained in the same is highly confidential and proprietary information.

Pursuant to the above referenced statements, Windstream East requests that Exhibits A and B attached to its Second Amendment to its Supplemental Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility's First and Second Data Requests be deemed confidential by the Commission.

WHEREFORE, Windstream East respectfully requests that the Commission enter all necessary orders granting confidential treatment as requested herein.

Respectfully Submitted,

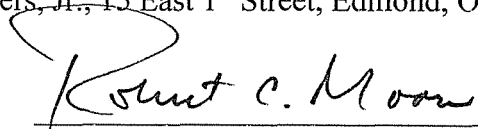
Date: 1/13/10

By: Robert C. Moore
Robert C. Moore
Hazelrigg & Cox, LLP
P.O. Box 676
415 West Main Street
Frankfort, KY 40602-0676
502-227-2271

Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
Little Rock, Arkansas 72212-2442

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via hand delivery on this the 12TH day of JANUARY, 2010 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.



Robert C. Moore

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION **RECEIVED**

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)
)
)
)

JAN 13 2010

PUBLIC SERVICE
COMMISSION

Case No. 2009-00246

**WINDSTREAM KENTUCKY EAST, LLC'S SECOND AMENDMENT TO ITS
SUPPLEMENTAL RESPONSES TO NEW CINGULAR WIRELESS PCS, D/B/A
AT&T MOBILITY'S FIRST AND SECOND DATA REQUESTS TO
WINDSTREAM KENTUCKY EAST, LLC**

Windstream Kentucky East, LLC ("Windstream East") submits as follows its Second Amendment to its Supplemental Responses to New Cingular Wireless PCS d/b/a AT&T Mobility's ("AT&T Mobility") First Data and Second 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.

**SPECIFIC SECOND AMENDED SUPPLEMENTAL RESPONSES TO DATA
REQUESTS**

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

SECOND AMENDED SUPPLEMENTAL RESPONSE: Please see the attached Exhibit A, which is a redacted version of Windstream Kentucky Form 477 filing information. Please note that this information is for both Windstream Kentucky East and Windstream Kentucky West, LLC, since there is no way to break out information for each individual company.

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.

SECOND AMENDED SUPPLEMENTAL RESPONSE:

- a. Please see the attached files "3Q 2009 Forecast 05-22-09 Inter.xls", "3Q 2009 Forecast 05-22-09 Intra.xls", and "3Q 2009 Forecast 05-22-09 Recip.xls", collectively attached herein as Exhibit B.

Windstream East Party Supporting the Response: David Blessing

Respectfully Submitted,

Date: 1/13/10

By: Robert C. Moore

Robert C. Moore
Hazelrigg & Cox, LLP
P.O. Box 676
415 West Main Street
Frankfort, KY 40602-0676
502-227-2271

Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
Little Rock, AR 72212
501-748-6873

CERTIFICATE OF SERVICE

On this 13TH day of JANUARY, 2010, true and correct copies of the foregoing **RESPONSES** were transmitted via United States certified mail, postage prepaid, return receipt requested to:

Mary K. Keyer
General Counsel/AT&T Kentucky
601 West Chestnut Street, Room 407
Louisville, KY 40203

Paul Walters, Jr.
15E. First Street
Edmond, Oklahoma 73034

Robert C. Moore
Robert C. Moore

EXHIBIT A TO SECOND AMENDMENT TO SUPPLEMENTAL RESPONSES
Windstream Redacted Kentucky Form 477 Report

See attached.

EXHIBIT B TO SECOND AMENDMENT TO SUPPLEMENTAL RESPONSES

3Q 2009 Forecast 05-22-09 Inter.xls
3Q 2009 Forecast 05-22-09 Intra.xls
3Q 2009 Forecast 05-22-09 Recip.xls

See attached.