

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
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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**NOTICE OF FILING OF PRELIMINARY JOINT ISSUES MATRIX BY
WINDSTREAM KENTUCKY EAST, LLC AND NEW CINGULAR WIRELESS
PCS, D/B/A AT&T MOBILITY .**

Come the parties, Windstream Kentucky East, LLC and New Cingular Wireless PCS d/b/a AT&T Mobility, by counsel, and pursuant to the Procedural Schedule issued by the Public Service Commission on February 23, 2010, hereby submit the attached Preliminary Joint Issues Matrix.

Respectfully Submitted,

By: 

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

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

By: 

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

and

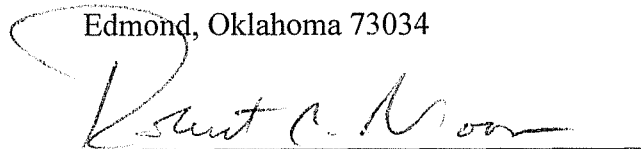
Paul Walters, Jr.
15E First Street
Edmond, Oklahoma 73034

CERTIFICATE OF SERVICE

On this 26th day of February, 2010, true and correct copies of the foregoing Notice of Filing 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

Windstream v. AT&T Mobility (KY PSC 2009-00246)

Preliminary Joint Issues Matrix

Issue No.	Issue Description	Contract Section	AT&T Mobility Position	Windstream Position
1.	Does AT&T Mobility owe originating access charges to Windstream for landline-originated traffic that terminates in a different MTA?	Part C: Sections 4.1 – 4.1.1.1.3 and Attachment 1 – Price List.		
2.	What is the appropriate interMTA factor?	Attachment 1 – Price List		
3.	What is the proper rate to be applied to Section 251(b)(5) traffic?	Attachment 1 – Price List		
	<ul style="list-style-type: none"> a. What is the proper percentage of traffic sensitive switching investment? b. What are the appropriate fill factors for circuit switching and other transport and termination equipment? c. What is the appropriate cost of capital for Windstream's cost study? d. What are appropriate 	<ul style="list-style-type: none"> Attachment 1 – Price List Attachment 1 – Price List Attachment 1 – Price List Attachment 		

Issue No.	Issue Description	Contract Section	AT&T Mobility Position	Windstream Position
	landline-originated minutes of use for Windstream cost study?	1 – Price List		
	e. What switching, transport and other material prices are appropriate for Windstream's Cost Study?	Attachment 1 – Price List		
	f. Should joint and common costs be included in Windstream's cost study and reciprocal compensation rate?	Attachment 1 – Price List		
	g. Should the costs of interoffice cable be allocated among transport and non-transport uses?	Attachment 1 – Price List		
	h. Should Windstream's cost study reflect total demand and utilization of the transport network?	Attachment 1 – Price List		
	i. What is the appropriate mix of interoffice cable types for use in Windstream's cost study?	Attachment 1 – Price List		
	j. Should copper and fiber maintenance expense factors be the same in Windstream's cost study?	Attachment 1 – Price List		

Issue No.	Issue Description	Contract Section	AT&T Mobility Position	Windstream Position
	k. Should book investments and book expenses be used without any forward-looking adjustments in Windstream's cost study?	Attachment 1 – Price List		
	l. What is the appropriate treatment for marketing and service expenses?	Attachment 1 – Price List		