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March 19, 2010

**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

MAR 19 2010

PUBLIC SERVICE
COMMISSION

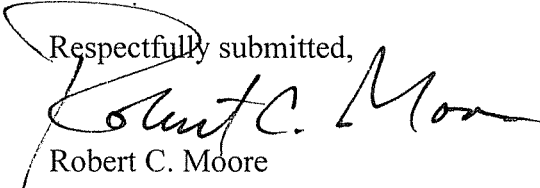
Re: Petition of Windstream Kentucky East, LLC ("Windstream") for Arbitration of an Interconnection Agreement with New Cingular Wireless PCS, LLC, D/B/A AT&T Mobility
Case No. 2009-00246

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 Responses to New Cingular Wireless PCS, D/B/A AT&T Mobility's Follow-up Data Requests. Exhibits "A" through "G" and Response 108(a)&(b)(shaded language) to Windstream's Responses contain confidential commercial information and Windstream files herewith its Petition for Confidential Treatment of Exhibits "A" through "G" and Response 108(a)&(b)(shaded language). The confidential language has been redacted from the 5 copies of Windstream's Responses, but the original of the Responses contains an unredacted copy of Exhibits "A" through "G" and Response 108(a)&(b)(shaded language). The copy of the 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/ey
Enclosures
cc: Stacy Majors

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAR 19 2010

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

**WINDSTREAM KENTUCKY EAST, LLC'S RESPONSES TO NEW CINGULAR
WIRELESS PCS, D/B/A AT&T MOBILITY'S FOLLOW-UP DATA REQUESTS TO
WINDSTREAM 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") Follow-Up 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

105. Based on Windstream Kentucky East's responses to AT&T Mobility's Data Requests 5 and 6, Windstream Kentucky East has not provided balance sheet statements for 2006, 2007 and 2008 apparently because these statements have not been filed with the Kentucky Public Service Commission or the Federal Communications Commission. Please provide Windstream Kentucky East's balance sheet statements for 2006, 2007, 2008 and 2009 at the greatest level of detail available and at least at the account level as found in Schedule III as filed recently by other incumbent local exchange carriers ("ILECs") with the Kentucky Public Service Commission. Note that for plant accounts, Schedule III provides beginning balances, additions, retirements, transfers and ending balances. Since ILECs file two versions of balance sheet statements (total company and Kentucky operations only) with the Kentucky Public Service Commission, Windstream Kentucky East should provide both versions, if different. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

RESPONSE: Please see "DR #105 Balance Sheet.pdf", attached hereto as Exhibit A.

Windstream East Party Supporting the Response: David Blessing

106. Based on Windstream Kentucky East's responses to AT&T Mobility's Data Requests 5 and 6, Windstream Kentucky East has not provided income statements for 2006, 2007 and 2008 apparently because these statements have not been filed with the Kentucky Public Service Commission or the Federal Communications Commission. Please provide Windstream Kentucky East's income statements for 2006, 2007, 2008 and 2009 at the greatest level of detail available and at least at the account level as found in Schedule VI as filed recently by other incumbent local exchange carriers ("ILECs") with the Kentucky Public Service Commission. Since Schedule VI contains employee counts and total compensation for employees, provide this information as well for 2006, 2007, 2008 and 2009. Since ILECs file two versions of income statements (total company and Kentucky operations only) with the Kentucky Public Service Commission, Windstream Kentucky East should provide both versions, if different. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

RESPONSE: Please see "DR #106 Income Statement.pdf", attached hereto as Exhibit B.

Windstream East Party Supporting the Response: David Blessing

107. If not provided in response to AT&T Mobility Data Request 106, please provide Rent Revenue (Account 5240) for 2006, 2007, 2008 and 2009. If available, separately identify the portion attributable to conduits and poles. On the other hand, if Rent Revenue separately attributable to conduits and poles is unavailable, provide 2008 “Equivalent Number of Poles,” “Conduit System-Trench Kilometers,” and “Conduit System-Duct Kilometers” using definitions consistent with the 2007 instructions for the FCC’s ARMIS Report 43-08. If 2009 information is not currently available, provide the 2009 portion when it becomes available.

RESPONSE: Windstream East objects to this data request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and/or seeks information or documents that are not relevant to the claims asserted by AT&T Mobility in this matter.

Windstream East Party Supporting the Response: David Blessing

108. The contract provided by Windstream Kentucky East on December 30, 2009 to AT&T Mobility's Data Request 35 appears to have expired.
- (a) Confirm or deny that this contract is the most recent contract for material costs associated with Windstream's IX facilities in Kentucky. If denied, provide the most recent contract.
 - (b) Confirm or deny the "new cost" prices found in Exhibit 2 of this contract support pricing information found within the ""Components List" tab in "Inplace Price Book_2007 update.xls," which was provided as part of Exhibit B to Windstream's response to AT&T Mobility's Data Request 9. If denied, provide the contracts or applicable price quotes that support the pricing information found within the "Components List" tab.

RESPONSE:

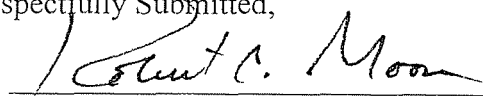
- (a) Windstream East denies that the contract provided on December 30, 2009 to AT&T Mobility's Data Request 35 is the most recent contract for material costs associated with Windstream East's IX facilities in Kentucky. Please see the following amendments attached hereto as Exhibit C:
- (b) Windstream East denies that the "new cost" prices found in Exhibit 2 of this contract support pricing information found within the ""Components List" tab in "Inplace Price Book_2007 update.xls," which was provided as part of Exhibit B to Windstream's response to AT&T Mobility's Data Request 9.
 - (i) Redacted.
 - (ii) Redacted.
 - (iii) Redacted.
 - (iv) Redacted.

Windstream East Party Supporting the Response: David Blessing

Date: 3/19/2010

Respectfully Submitted,

By:



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

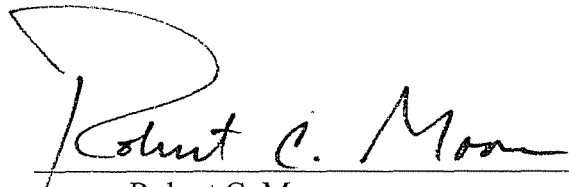
Stacy Majors
Regulatory Counsel
Windstream Communications, Inc.
4001 Rodney Parham Road
Little Rock, AR 72212
501-748-6873

CERTIFICATE OF SERVICE

On this 19th day of MARCH, 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, Kentucky 40203

Paul Walters, Jr.
15 East 1st Street
Edmond, Oklahoma 73034


Robert C. Moore

Exhibits A - G

Redacted.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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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) Case No. 2009-00246

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 Response 108(a)&(b)(shaded language) and Exhibits A-G attached to its Responses to New Cingular Wireless PCS, LLC, d/b/a AT&T Mobility’s Follow-Up Data Requests (“Responses”). In support of its Petition, Windstream East states as follows:

1. Windstream East is requesting confidential treatment for Response 108(a)&(b)(shaded language) and Exhibits A-G attached to its Responses. That Response and those Exhibits contain proprietary, confidential information that would aid competitors of Windstream East and the vendors with whom it has the contracts contained in the Responses and Exhibits, 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.

3. 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.

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

5. The disclosure of the confidential and proprietary information contained in the Exhibit would result in significant or irreparable harm to Windstream East and its vendors with whom it has the contracts contained in the Responses and Exhibits by providing their 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.

6. Windstream East seeks confidential treatment for the entirety of Response 108(a)&(b)(shaded language) and Exhibits A-G 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 this information be deemed confidential by the Commission.

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

Date: 3/19/2010

Respectfully Submitted,

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

and

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 14th day of MARCH, 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, and on Tiffany Bowman, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615.



Robert C. Moore