



Mary K. Keyer
General Counsel
Kentucky Legal Department

AT&T Kentucky
601 W. Chestnut Street
Room 407
Louisville, KY 40203

T 502-582-8219
F 502-582-1573
mary.keyer@att.com

August 17, 2010

VIA COURIER

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

RECEIVED

AUG 17 2010

PUBLIC SERVICE
COMMISSION

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

Dear Mr. Derouen:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of AT&T Mobility's Supplemental Data Requests to Windstream Kentucky East, LLC.

Portions of AT&T Mobility's Supplemental Data Requests contain confidential commercial information of Windstream and AT&T Mobility files herewith its Petition for Confidentiality, pursuant to 807 KAR 5:001, Section 7, seeking protection of that material. Specifically, AT&T Mobility requests the Commission to grant confidentiality to the highlighted information on pages 4, 5, 6, 7, 8, 9, 13, 14, 15, 18, and 19 as it relates to Windstream's updated cost study.

There is other commercial information of Windstream's from its original cost study on those same pages of AT&T Mobility's Supplemental Data Requests for which the Commission already granted confidentiality by letter dated August 28, 2009. Therefore, AT&T Mobility is filing that information as confidential pursuant to the Commission's grant of confidentiality.

One copy of the proprietary version of the filing is provided to the Commission and a copy also is served on Windstream. Edited copies of the filing are provided for the public file.

Should you have any questions, please let me know.

Sincerely,


Mary K. Keyer

cc: Parties of Record

841053

EDITED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

THE PETITION OF WINDSTREAM)	
KENTUCKY EAST, LLC FOR ARBITRATION)	CASE NO.
OF AN INTERCONNECTION AGREEMENT)	2009-00246
WITH NEW CINGULAR WIRELESS PCS, LLC)	
D/B/A/ AT&T MOBILITY PURSUANT TO)	
SECTION 252 OF THE TELECOMMUNICATIONS)	
ACT OF 1996)	

NEW CINGULAR WIRELESS, PCS, LLC D/B/A AT&T MOBILITY'S
PETITION FOR CONFIDENTIALITY

New Cingular Wireless, PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility"), by counsel, hereby petitions the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to KRS 61.878 and 807 KAR 5:001, § 7, to classify as confidential the highlighted information on pages 4, 5, 6, 7, 8, 9, 13, 14, 15, 18, and 19 in AT&T Mobility's Supplemental Data Requests to Windstream Kentucky East, LLC, as that information pertains to Windstream's revised cost study filed with the Commission on or about May 27, 2010. Windstream filed with its updated cost study its Petition for Confidential Treatment of the information for which AT&T Mobility seeks confidentiality. The Commission has not yet ruled on Windstream's Petition.

The other information highlighted on those same pages is from Windstream's original cost study filed on or about August 10, 2009, and has already been granted confidentiality by the Commission by letter dated August 28, 2009. Therefore, that information is being filed as confidential pursuant to the Commission's grant of confidentiality.

The Kentucky Open Records Act exempts certain information from the public disclosure requirements of the Act, including certain commercial information. KRS 61.878(1)(c)1. To qualify for the commercial information exemption and, therefore, keep the information confidential, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors and the parties seeking confidentiality if openly discussed. KRS 61.878(1)(c)1; 807 KAR 5:001 § 7. The Commission has taken the position that the statute and rules require the party to demonstrate actual competition and the likelihood of competitive injury if the information is disclosed.

The information for which AT&T Mobility seeks confidentiality relates to Windstream's costs of providing services in Kentucky, specifically, confidential calculations, figures and numbers regarding Windstream's network and traffic information, as well as confidential switching information, contained in Windstream's revised cost study. If Windstream's competitors were to obtain this information, it would be to the competitive disadvantage of Windstream because those competitors would have access to underlying cost information of Windstream. This would allow the competitors to use that information to their benefit in pricing their services in the markets in which they compete with Windstream. Windstream's competitors include providers of wireless, retail and wholesale telephone services and telephone-related services.

As further grounds for its Petition, AT&T Mobility states and understands based on information and belief as follows:

(1) The information for which AT&T Mobility is requesting confidential treatment is not known outside of Windstream except under a non-disclosure agreement;


(2) The information is not widely disseminated within AT&T Mobility and is known only by those AT&T Mobility employees who have a need to know and who have signed a non-disclosure agreement in this case;

(3) AT&T Mobility seeks to preserve the confidentiality of this information through appropriate means, including the maintenance of appropriate security at its offices; and

(4) By granting AT&T Mobility's petition, there would be no damage to any public interest.

For the reasons stated herein and in Windstream's Petition for Confidential Treatment filed on May 27, 2010, AT&T Mobility respectfully requests that the Commission grant AT&T Mobility's request for confidential treatment of the information described herein.

Respectfully submitted,



MARY K. KEYER
601 W. Chestnut Street, Room 407
Louisville, KY 40203
(502) 582-8219
mary.keyer@att.com

PAUL WALTERS, JR.
151 E. 1st Street
Edmond, OK 73034
(405) 359-1718
pwalters@sbcglobal.net

COUNSEL FOR NEW CINGULAR
WIRELESS, PCS, LLC D/B/A AT&T MOBILITY

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF WINDSTREAM KENTUCKY)	
EAST, LLC, FOR ARBITRATION OF AN)	CASE NO.
INTERCONNECTION AGREEMENT WITH)	2009-00246
NEW CINGULAR WIRELESS PCS,)	
D/B/A AT&T MOBILITY)	

**AT&T MOBILITY'S SUPPLEMENTAL DATA REQUESTS
TO WINDSTREAM KENTUCKY EAST, LLC**

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, on behalf of itself and its wireless operating affiliates (collectively "AT&T Mobility"), pursuant to the Joint Procedural Schedule approved by the Commission on August 12, 2010, hereby serves its Follow-up Data Requests to Windstream Kentucky East, LLC ("Windstream" or "Windstream Kentucky East").

INSTRUCTIONS

(a) If any response required by way of answer to these Data Requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion. If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(b) These Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(c) If a Data Request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Data Request, answer all parts of the Data Request to which you do not object, and as to each part to which you object, separately set forth the specific basis for the objection.

(d) These Data Requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Data Requests subsequently become known or should your initial response be incorrect or untrue.

(e) For each Data Request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DEFINITIONS

(a) "Windstream" means, unless otherwise indicated, Windstream Kentucky East, LLC, the incumbent local exchange carrier, any predecessors in interest, its parents, subsidiaries, and affiliates, its present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Windstream.

(b) "AT&T Mobility" means New Cingular Wireless PCS, LLC d/b/a AT&T Mobility, on behalf of itself and its wireless operating affiliates.

(c) "You" and "your" refer to Windstream or Windstream Kentucky East.

(d) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(e) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(f) The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Windstream, including, but not limited to, correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail ("Email") files, and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

(g) The phrases "refer to" and "relate to" mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any

way, or in any way logically or factually connected or associated with the matter discussed.

DATA REQUESTS

The following data requests involve Windstream Kentucky East's modified cost study.

Tab "Composite Costs"

105. Given the significant changes in Windstream's claimed minutes of use ("MOUs"), why did the "composite weight factors" (see Tab "Composite Costs") remain the same?
- a. Provide all formulae and work papers supporting the "composite weight factors."

Tab "EO Switching"

106. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in EO Switching Material Costs on Excel Row 9 of Tab "EO Switching."
- a. Provide all documentation and work papers supporting the change.
- b. Why isn't this highlighted as a change in the modified cost study?
107. Identify with specificity what elements of switching investment and/or costs the study considers to be non-traffic-sensitive and provide the rationale supporting this claim.
108. See Tab "EO Switching," Excel Row 12. In the revised cost study, the "Other Material %" changes from ■% in the original cost study to ■%. Explain with particularity each factor that caused the drop.
109. Tab "EO Switching," Excel Row 27 shows a change in the "Capital Charge Factor" from ■% in the original cost study to ■%. Explain with particularity each factor that caused the drop.
110. Tab "EO Switching," Excel Row 29 shows a change in the "Direct Expense Factor" from ■% in the original cost study to ■%. Explain with particularity each factor that caused the drop.

111. TAB "EO Switching," Excel Row 38 shows a change in "Total Minutes" from [REDACTED] in the original cost study to [REDACTED].
- a. With reference to Tab "Demand," explain how the figure of [REDACTED] was derived.
 - b. Explain the rationale for the change from the original to the modified cost study.
 - c. Provide all documents and work papers supporting the change.
 - d. Explain why the "Total Minutes" for end office switching are not the same as for IX Facility and IX Termination.
 - i. Identify the location(s) in the cost study or underlying documentation supporting this difference.

Tab "Tandem Switching"

112. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in Tandem Switching Material Costs on Excel Row 9 of Tab "Tandem Switching."
- a. Provide all documentation and work papers supporting the change.
 - b. Why isn't this highlighted as a change in the modified cost study?
113. Explain why the non-traffic sensitive ("NTS") percentage for tandem switching is [REDACTED] but the NTS percentage for end office switching is [REDACTED] %.
- a. Provide all documentation and work papers supporting the [REDACTED] percent factor.
114. Explain why the "Other Material %" in Excel row 12 is the same for tandem switching as for end office switching.
115. Tab "Tandem Switching," Excel Row 38, shows a change in "Total Minutes" from [REDACTED] in the original cost study to [REDACTED].
- a. With reference to Tab "Demand," explain how the figure of [REDACTED] was derived.
 - b. Explain the rationale for the change from the original to the modified cost study.
 - c. Provide all documents and work papers supporting the change.

Tab "IX Facility"

116. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in IX Transport Facility Material Costs on Excel Row 9 of Tab "IX Transport Facility."

- a. Provide all documentation and work papers supporting the change.
 - b. Why isn't this highlighted as a change in the modified cost study?
117. With regard to the change of NTS percentage on Excel Row 10 of Tab "IX Facility" from █% in the original cost study to █%, identify all elements of "IX Transport Facility" that the cost study considers to be traffic sensitive.
 - a. Explain the rationale for this claim.
118. Explain why the "Other Material %" in Excel Row 12 is the same for IX transport facility as for tandem switching and end office switching.
119. Tab "IX Facility," Excel Row 27 shows a change in the "Capital Charge Factor" from █% in the original cost study to █%. Explain with particularity each factor that caused the drop.
 - a. Provide all documentation and work papers supporting the change.
120. Tab "IX Facility," Excel Row 29 shows no change in the "Direct Expense Factor" from the original to the modified cost study. Explain why the Direct Expenses Factor changed for EO and Tandem Switching but not for IX Transport Facility.
121. Tab "IX Facility," Excel Row 38, shows a change in "Total Minutes" from █ in the original cost study to █.
 - a. With reference to Tab "Demand," explain how the figure of 286,993,767 was derived.
 - b. Explain the rationale for the change from the original to the modified cost study.
 - c. Provide all documents and work papers supporting the change.
122. Does the revised cost study assign any portion of "IX Facility" costs to non-transport uses of the interoffice cable system, such as leased facilities and loop concentrators?
 - a. If yes, what percentage is assigned, how was this percentage derived and where can it be found on Tab "IX Facility"?
 - b. If yes, does this constitute a change from the original cost study?
123. Does the revised cost study assign any portion of "IX Facility" costs to transport uses of the interoffice cable system that are not involved in the transport and termination of wireless-originated traffic, such as dedicated transport trunks and direct transport trunks?
 - a. If yes, what percentage is assigned, how was this percentage derived and where can it be found on Tab "IX Facility"?
 - b. If yes, does this constitute a change from the original cost study?

124. In determining "IX Facility" costs, does the revised cost study determine a total amount of interoffice trunks?
- a. If yes, where can that value be found on Tab "IX Facility"?
 - b. If yes, are all trunks expressed on a DS-0 basis?
 - c. If yes, does the value include all circuits utilizing Windstream's interoffice transport system?
 - i. If yes, identify where all such circuits are listed in the revised study.
 - d. If yes, does this constitute a change from the original cost study?

Tab "IX Termination"

125. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in IX Transport Termination Material Costs on Excel Row 9 of Tab "IX Transport Termination."
- a. Provide all documentation and work papers supporting the change.
 - b. Why isn't this highlighted as a change in the modified cost study?
126. Regarding the change in NTS percentage on Excel Row 10 of Tab "IX Termination" from █% in the original cost study to █%, explain with particularity each element of "IX Termination" that the cost study considers traffic sensitive.
- a. Provide the rationale for this claim.
127. Explain why the "Other Material %" in Excel Row 12 is the same for IX transport termination as for tandem switching and end office switching.
128. Tab "IX Termination," Excel Row 27 shows a decrease in the "Capital Charge Factor" from █% in the original cost study to █%. Explain with particularity each factor that caused the increase.
- a. Provide all documentation and work papers supporting the change.
129. Does the revised cost study assign any portion of "IX Termination" costs to non-transport uses of the interoffice system, such as leased facilities and loop concentrators?
- a. If yes, what percentage is assigned, how was this percentage derived and where can it be found on Tab "IX Termination"?
 - b. If yes, was this a change from the original cost study?

130. Does the revised cost study assign any portion of "IX Termination" costs to transport uses of the interoffice system that are not involved in the transport and termination of wireless-originated traffic, such as dedicated transport trunks and direct transport trunks?
- a. If yes, what percentage is assigned, how was this percentage derived and where can it be found on Tab "IX Termination"?
 - b. If yes, was this a change from the original cost study?
131. In determining "IX Termination" costs, does the revised cost study determine a total amount of interoffice trunks?
- a. If yes, where can that value be found on Tab "IX Termination"?
 - b. If yes, are all trunks expressed on a DS-0 basis?
 - c. If yes, does the value include all circuits utilizing Windstream's interoffice transport system?
 - i. If yes, identify where all such circuits are listed in the revised study.
 - d. If yes, was this a change from the original cost study?

Tab "HR Facility"

132. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in HR Facility Material Costs on Excel Row 9 of Tab "HR Facility."
- a. Provide all documentation and work papers supporting the change.
 - b. Why isn't this highlighted as a change in the modified cost study?
133. Regarding the change in NTS percentage on Excel Row 10 of Tab "HR Facility" from [REDACTED]% in the original cost study to [REDACTED]%, identify with particularity each element of "HR Facility" that the cost study considers traffic sensitive.
- a. Provide the rationale for this claim.
134. Explain why the "Other Material %" in Excel Row 12 is the same for HR Facility as for tandem switching and end office switching.
135. Tab "HR Facility," Excel Row 27 shows a decrease in the "Capital Charge Factor" from [REDACTED]% in the original cost study to [REDACTED]%. Explain with particularity each factor that caused the decrease.
- a. Provide all documentation and work papers supporting the change.
136. Tab "HR Facility," Excel Row 38, shows a change in "Total Minutes" from [REDACTED] in the original cost study to [REDACTED].

- a. With reference to Tab "Demand," explain how the figure of [REDACTED] was derived.
- b. Explain the rationale for the change from the original to the modified cost study.
- c. Provide all documents and work papers supporting the change.

Tab "HR Termination"

137. Explain with particularity each factor that caused the drop (from the original cost study to the modified cost study) in HR Termination Material Costs on Excel Row 9 of Tab "HR Termination."
 - a. Provide all documentation and work papers supporting the change.
 - b. Why isn't this highlighted as a change in the modified cost study?
138. With regard to the change in NTS percentage on Excel Row 10 of Tab "HR Termination" from [REDACTED]% in the original cost study to [REDACTED]%, identify with particularity each element in "HR Termination" that the cost study considers traffic sensitive.
 - a. Explain the rationale for this claim.
139. Explain why the "Other Material %" in Excel Row 12 is the same for HR Termination as for tandem switching and end office switching.
140. Tab "HR Termination," Excel Row 27 shows a decrease in the "Capital Charge Factor" from [REDACTED]% to [REDACTED]%. Explain with particularity each factor that caused the change.
 - a. Provide all documentation and work papers supporting the change.

Tab "Input"

141. Regarding the Material Costs in Cells D7 through D9 and Cells D11 through D12, please explain in detail why these values changed from the original cost study.
 - a. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.
142. Regarding the Minutes in Cells D18 through D37, please explain in detail why these values changed from the original cost study.
 - a. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.
143. Regarding the Capital Charge Factors in Cells D49 through D54, please explain in detail why these values changed from the original cost study.

- a. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.
144. Regarding the NTS Percent in Cells D102 through D105, please explain in detail why these values changed from the original cost study.
- a. Provide all assumptions, worksheets programs and calculations that support the derivation of these values.
145. Regarding the Switch NTS Percent in Cell D78, please explain in detail why this value changed from the original cost study.
- a. Provide all assumptions, worksheets, programs and calculations that support the derivation of this value.

Tab "Demand"

146. Regarding the Minutes in Cells D9 through D29, please explain in detail why these values changed from the original cost study.
- a. Describe the methodology used to calculate the minutes in Cells D9 through D29.
 - b. Describe how the methodology in the modified study differed from the methodology used in the original study.
 - c. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.
147. Regarding the Recip Comp Minutes in Cells D43 and D44, please explain in detail why these values changed from the original cost study.
- a. Describe the methodology used to calculate the minutes in Cells D43 and D44.
 - b. Describe how the methodology in the modified study differed from the methodology used in the original study.
 - c. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.
148. Regarding the Minutes in Cells D50 through D63, please explain in detail why these values changed from the original cost study.
- a. Describe the methodology used to calculate the minutes in Cells D50 through D63.
 - b. Describe how the methodology in the modified study differed from the methodology used in the original study.

- c. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.

Tab “Cost Factors”

- 149. Regarding the Switch Support Assets Factor in Cell I30, please explain in detail why this value changed from the original cost study.
 - a. Provide all assumptions, workpapers, worksheets and programs that support the derivation of this value.
- 150. Regarding the Direct Expense Factors in Cells I33 through I38, please explain in detail why these values changed from the original cost study.
 - a. Provide all assumptions, workpapers, worksheets and programs that support the derivation of these values.
- 151. Regarding the Debt Ratio in Cell I47, please explain in detail the reason why this value changed from the original cost study.
 - a. Provide all assumptions, worksheets, programs and calculations that support the derivation of this value.
- 152. Regarding the Interest Rate in Cell I48, please explain in detail the reason why this value changed from the original cost study.
 - a. Provide all assumptions, worksheets, programs and calculation that support the derivation of this value.
- 153. Regarding the Cost of Capital in Cell G49, please explain in detail why you believe this factor is the correct factor to use.
 - a. Provide all company documents and references to publicly available documents upon which you rely to support your claim.
- 154. Regarding the Effective Income Tax Gross Up on Total Return in Cell G53, please explain in detail why you believe this factor is the correct factor to use as opposed to using the Composite Income Tax Rate in Cell G57.
 - a. Provide all company documents and references to publicly available documents upon which you rely to support your claim.
- 155. Regarding the Retail Percents in Cells G61 through G63 and G66, please explain in detail why these values changed from the original cost study.
 - a. Provide all assumptions, worksheets, programs and calculation that support the derivation of this value.

Tab “Material Factors”

156. Regarding the Other Material %, Install % and Engineering % in Cells D8 through D11, H8 through H11, H14, I8 through I11, and I14, please explain in detail why these values changed from the original cost study.
- a. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.

Tab “Common Costs”

157. Regarding the Common Costs, please explain in detail why the Forward Looking Common Cost Factor in Cell E 63 changed from the original cost study.
- a. Provide all assumptions, worksheets, programs and calculations that support the derivation of this value.

Tab “Capital ACF”

158. Regarding the Embedded Kentucky East Plant located in Cells M4 through M30, if there is a company report that is the source of these values, please provide that report.
159. Regarding the Total Windstream Wireline Embedded Plant Distribution in Columns O, P, Q and R, if there is a company report that is the source of these values, please provide that report.
160. Regarding the ACF values in Cells C33 through C45, please explain in detail why these values changed from the original cost study.
- a. Provide all assumptions, worksheet calculations, and programs that support the derivation of these values.

Tab “Depr_Inputs”

161. Regarding the Capital Cost Inputs in Cells C9 through C11, please explain in detail why these values changed from the original cost study.
- a. Provide all assumptions, worksheets, programs and calculations that support the derivation of these values.

The following questions involve modified spreadsheet “IX Facilities_KYEast_2009 Prices_Adj for non-IX fiber.4.13.10.”

Tab “IX Facilities Detail”

162. How were the updated 2009 material and installation costs developed?

- a. Provide all documentation and work papers supporting the updated material and installation costs.
 - b. How did the development of the updated 2009 material and installation costs differ from the development of IX Facilities material and installation costs in the original cost study?
163. Does this updated spreadsheet assume that all interoffice cables contain 24 fibers?
- a. How does this assumption cause the modified cost study to differ from the original cost study?
 - b. What is the rationale for this assumption?
 - c. Provide all documentation and work papers in support of this assumption.

Tab “IX Facilities”

164. Explain why the “Engineering” factor has been changed from ■% in cell F111 in the original cost study to ■% in cell I111 in the modified cost study.
- a. What rationale supports the ■% factor?
 - b. Provide all documentation and work papers supporting the ■% factor.
165. Explain the process used to modify the updated material and installation costs for “sharing” (Columns N and O).
- a. What is the rationale for this process?
 - b. Provide all documentation and work papers supporting the rationale.

The following question involves modified spreadsheet “2009 CS 1500 Update 4.13.10.xls.”

166. In computing switching costs in the modified cost study, are the prices shown on Tab “2009 Prices” applied to Tab “Switch Cost Data” in the modified spreadsheets “Switch Replacement_2010 Update_KY219.4.13.10.xls” and “Switch Replacement_2010 Update_KY220.4.13.10.xls”?

The following questions involve modified spreadsheet “Electronic Input_2010_KY East Revised.4.13.10.xls.”

Tab “IX Fiber Equip \$”

167. Are there any material differences between this tab and the identically named tab in the originally provided spreadsheet “Electronics Input_KYEast_09.xls”?

- a. If yes, describe the differences with particularity.

Tab “IX Fiber_TS Factor”

168. Explain how the [REDACTED] % factors in cells C219, D219, E219 and F219 were derived.

- a. Explain the rationale supporting the derivation.
- b. Provide all documentation and work papers supporting the 50% factor.

169. Explain how the [REDACTED] % factor in cell G219 was derived.

- a. Explain the rationale supporting the derivation.
- b. Provide all documentation and work papers supporting the [REDACTED] % factor.

170. Explain how the [REDACTED] % factor in cell H219 was derived.

- a. Explain the rationale supporting the derivation.
- b. Provide all documentation and work papers supporting the [REDACTED] % factor.

Tab “Electronics Prices”

171. Explain why “Electronics Prices” were not updated in the modified cost study.

The following question involves spreadsheet “MDF Power worksheet_2--9.4.13.10.xls.”

172. Explain how this spreadsheet is incorporated into and affects the modified cost study.

- a. In the modified cost study, identify specific tabs and cell numbers where data from this spreadsheet are used.

The following questions involve revised spreadsheet “Switch Replacement_2010 Update_KY219.4.13.10.xls.”

Tab “Switch Cost Data”

173. Referring to the Heading “Host Switch Replacement Models”:

- a. Why were the categories expanded in Column A, as compared to the original spreadsheet?

- b. Why does the spreadsheet not model a switch sized to meet the actual or anticipated number of lines served from a specific wire center?
- c. Explain why the factor in cell B13 has been changed from ■■■% in the original cost study to ■■■%.
- d. Describe what elements listed in Excel row 6 are considered non-traffic-sensitive by Windstream.
 - i. Explain how, for each element discussed, the cost of the element varies with the number of calls processed.
 - ii. Provide all documentation and work papers supporting the discussion in "d.i" above.
- e. Referring to cell AQ6, explain the derivation of the formula used to compute the amount in this cell.
 - i. In the formula, explain with specificity the meaning and derivation of the value "■■■■."
 - ii. Explain the rationale supporting this value.
 - iii. Provide all documentation and work papers supporting this value.

174. Referring to the heading "Tandem Switch Replacement Model":

- a. Does Windstream Kentucky East have any "standalone" tandem switches in its network; *i.e.*, switches that perform only tandem functions and do not also perform end office functions?
 - i. If yes, identify all such "standalone" tandems.
- b. Does the "Tandem Switch Replacement Model" assume that all tandems in the Windstream Kentucky East network will be "standalone" units that will not also perform end office switching functions?
 - i. If not, identify with particularity in Tab "Switch Cost Data," or in any other tab in this spreadsheet, or in any other spreadsheet provided by Windstream to AT&T Mobility, where costs are apportioned between tandem and end office switching functions in non-standalone-tandems.

175. Referring to the heading "Remote Switch Replacement Models":

- a. Are the costs for a remote switch equipped with a specified number of line ports assumed to be the same as the costs for a host switch equipped with the same specified number of line ports?
- b. If the answer is no, identify with specificity those elements for which costs are assumed to differ.

The following questions pertain to the Kentucky - Verizon Summary of Usage for Recip Comp 04-05-10.xls worksheet that supports Windstream's Revised Cost Model dated 4-13-10:'

176. Why does the file name contain "Verizon"?
177. Regarding the Total PEGS Line to Line Tab, please explain why this Tab is included in the Kentucky - Verizon Summary of Usage for Recip Comp 04-05-10.xls worksheet and is not included in the previous usage support file DR #64 File #4 Revised Study to ATT.xls.
178. Regarding the Total PEGS Line to Line Tab, please describe in detail each column header.
 - a. Spell out all abbreviations and explain what each column represents and how each column is calculated.
179. Regarding the PEGS Tab, please explain each column header in detail. Spell out each abbreviation and explain what each represents.
 - a. If the column headers are different from the column headers on the PEGS Tab in the previous usage support worksheet (DR #64 File #4 Revised Study to ATT.xls), provide the rationale for the change(s).
180. Regarding the PEGS Tab and the Minutes Tab, please explain any variances in data collection or calculations between the current usage worksheet (Kentucky - Verizon Summary of Usage for Recip Comp 04-05-10.xls) and the former usage worksheet (DR #64 File #4 Revised Study to ATT.xls).
181. Regarding the Minutes Tab, please explain each column header in detail.
 - a. Spell out each abbreviation and explain what each represents.
 - b. If the column headers are different from the column headers on the MOU Tab in the previous usage support worksheet (DR #64 File #4 Revised Study to ATT.xls), provide the rationale for the change(s).
182. Regarding the Summary Tab, please explain each column header in detail.
 - a. Spell out each abbreviation and explain what each represents.
 - b. If the column headers are different from the column headers on the Summary Tab in the previous usage support worksheet (DR #64 File #4 Revised Study to ATT.xls), provide the rationale for the change(s).

183. Provide any analysis that was performed by Windstream to compare and explain the differences between the MOUs in the original study with the MOUs in the revised study.
184. Provide the name, title, and business address of the person or persons who developed the Minutes of Use in Windstream's Original Recip Comp Study 2009 filed in Kentucky Case 2009-00246.
185. Provide the name, title, and business address of the person or persons who developed the Minutes of Use in Windstream's Revised Recip Comp Study dated 4-13-10.
186. Explain why the column headings in the tab labeled MOU in the Kentucky-Verizon Summary of Usage for Recip Comp 4-5-10 file provided to AT&T do not match the column headings of the prior usage study provided as Exhibit C DR 64 File #4 Revised Study to AT&T, tab labeled Minutes.
187. This series of questions explores the differences in methodology between the original MOU estimation (DR #64 File #4 Revised Study to ATT.xls; hereafter "Original MOU Spreadsheet") and the MOU estimated for the modified cost study (Verizon Summary of Usage for Recip Comp 04-05-10.xls; hereafter "Modified MOU Spreadsheet").
 - a. Referring to Tab "MOU" on the Original MOU Spreadsheet:
 - i. Explain what MOUs are captured in Column "Orig Rec MOU."
 - ii. Are "Total Orig MOUs" calculated by the following formula: Divide "Orig Rec MOUs" by "Orig Rec PEGS"; then multiply the dividend by "Total Orig PEGS"?
 - iii. If no, give the formula by which "Total Orig MOUs" are calculated.
 - iv. If yes, explain the rationale for dividing "Orig Rec MOUs" by "Orig Rec PEGS."
 - v. If yes, explain the rationale for multiplying the dividend by "Total Orig PEGS."
 - vi. Referring to Column E "T/O Ratio": Does a factor of one mean that the spreadsheet assumes that "Term Non Rec MOU" equals "Orig Non Rec MOU"?
 - vii. If yes, would a factor of .5 mean that "Term Non Rec MOU" would be assumed to be one-half "Orig Non Rec MOU"?
 - viii. If yes, would a factor of zero mean that "Term Non Rec MOU" would be assumed to be zero?
 - ix. Explain how the values for "Local Orig Rec MOU," "Local Term REC MOU," "EAS Orig MOU" and "EAS Term MOU" were compiled.

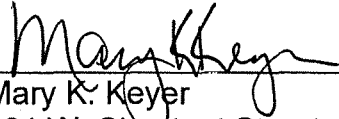
- x. Do columns K and L contain all MOUs applied in the original cost study?
 - 1. If no, identify where other MOUs applied in the original cost study can be found?
 - 2. If yes, do the MOUs in columns K and L contain both local and interexchange MOUs?
 - 3. If yes, explain why the total MOUs shown in cell L58 do not equal the MOUs shown in cell D38 of Tab "EO Switching" of the original cost study.
 - 4. Is the ratio of total terminating MOUs to total originating MOUs ■% to ■%?
 - 5. Is this ratio consistent with historical traffic patterns?
 - 6. If not, explain.
- b. Referring to Tab "Minutes" on the Modified MOU Spreadsheet:
 - i. Unlike the Original MOU Spreadsheet, the Modified MOU Spreadsheet calculates total MOUs using both "Orig Rec MOU" and "Term Rec MOU." Explain the rationale for the change.
 - ii. Is "Orig Line to Line MOU" calculated by the following formula: Add "Orig Rec MOU" and "Term Rec MOU," then divide that sum by the sum of "Orig Rec PEGS" and "Term Rec PEGS," and then multiply that dividend by "Orig Line to Line PEG"?
 - iii. If no, explain the formula used.
 - iv. If yes:
 - 1. Is this an attempt to calculate "line-to-line" MOUs?
 - 2. Explain the rationale for calculating "line-to-line" MOUs by the use of PEG counts.
 - v. Does a "T/O" ratio of "0" mean that the calculations assume that there are no "line-to-line" MOUs that originate and terminate in the same switch?
 - 1. If yes, explain the rationale.
 - 2. If no, explain what a ratio of "0" means.
 - vi. Explain how the values for "Local Orig Rec MOU," "Local Term REC MOU," "EAS Orig MOU" and "EAS Term MOU" were compiled.
 - vii. Do columns L and M contain all the MOUs applied in the revised cost study?
 - 1. If no, identify where other MOUs applied in the original cost study can be found?
 - 2. If yes, do the MOUs in columns L and M contain both local and interexchange MOUs?
 - 3. Is the total of originating and terminating MOU the sum of cells L57 and M 57?
 - 4. Is that sum ■■■■■?

5. Explain why the sum of Cells L57 and M57 does not equal the MOUs shown in cell D38 of Tab "EO Switching" of the modified cost study.
6. Does cell D38 of Tab "EO Switching" of the modified cost study use only terminating MOUs?
7. Is the ratio of total terminating MOUs to total originating MOUs ■■■% to ■■■%?
8. Is this ratio consistent with historical traffic patterns?
9. If not, explain.

The following questions pertain to the document titled "Summary of changes in 2010 updated study.4.16.10.doc."

188. Regarding the statement that "customers moved from dial-up ISP to DSL":
- a. Provide the dial-up monthly minutes of use for each exchange for 2007 through 2009.
 - b. Does the revised cost study include DSL MOUs in calculating costs?
 - c. If not, does the revised study remove from the calculations all investment and costs related to the provision of DSL service?
 - i. If such investment and costs are removed, identify where this is shown in the revised cost study.
189. Regarding the statement: "However, in determining the line to line usage, the previous process estimated this usage which was not working properly and was overstating the line to line minutes. A new process identifies the actual line to line minutes for all switches. The revised model uses these actual line to line minutes."
- a. Are trunk MOU values in the revised study computed using an estimate, or are they based on actual data?
 - i. If actual data, identify where in the cost study or supporting documentation they can be found.
 - b. Did the original cost study calculate line to line minutes?
 - i. If yes, identify where such calculations can be found.
 - ii. If no, explain why not.
 - c. Explain why you claim that the previous process was overstating line to line minutes.
 - d. Explain why you claim that the modified process corrects the asserted overstatement.

Respectfully submitted,



Mary K. Keyer
601 W. Chestnut Street, Room 407
Louisville, KY 40203
Telephone: (502) 582-8219
mary.keyer@att.com

Paul Walters, Jr.
15 E. First Street
Edmond, OK 73034
Telephone: (405) 359-1718
pwalters@sbcglobal.net

COUNSEL FOR NEW CINGULAR
WIRELESS PCS, D/B/A AT&T MOBILITY

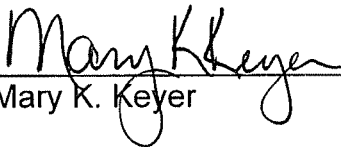
841039

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 17th day of August 2010.

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

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



Mary K. Keyer