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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE PETITION)
OF WINDSTREAM KENTUCKY EAST,)
LLC FOR ARBITRATION OF AN)
INTERCONNECTION AGREEMENT)
WITH NEW CINGULAR WIRELESS)
PCS, LLC D/B/A AT&T MOBILITY)
PURSUANT TO SECTION 252 OF THE)
TELECOMMUNICATIONS ACT OF)
1996.)

Docket No. 2009-00246

WINDSTREAM KENTUCKY EAST, LLC'S SUPPLEMENTAL DATA
REQUESTS TO NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T
MOBILITY

Windstream Kentucky East, LLC ("Windstream East") submits the following Supplemental Data Requests to New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T") to be answered in accord with the following:

DEFINITIONS

- "Windstream East" means Windstream Kentucky East, LLC.
- "You" and "your" refer to AT&T, as well as any predecessors in interest, parent(s), subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting on behalf of AT&T.
- "Affiliate" as defined in Section 3 of the Federal Telecommunications Act of 1996 ("the Act") means "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term "owns" means to own an equity interest (or the equivalent thereof) of more than 10 percent." (47 U.S.C. §153(1).)
- "Document" shall have the broadest possible meaning under applicable law and means every writing or record of every type and description that is in your full or

partial possession, custody or control, including, by way of illustration and not limitation, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, schedules, work sheets, comparisons, minutes or statistical compilations, computer and other electronic records or tapes or printouts, I including, but not limited to, electronic mail files and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original.

- “Referring” or “relating to” means 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.
- “And” and “or” as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction shall serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.
- “Identify” or “identifying” or “identification” when used in reference to a document means to provide, with respect to each document requested to be identified by these discovery requests, a description of the document that is sufficient for purposes of a request to produce or a subpoena *duces tecum*, including the following:
 - a. the type of document (*e.g.*, letter, memorandum, etc.);
 - b. the date of the document;

- c. the title or label of the document;
 - d. the identity of the document originator;
 - e. the identity of each person to whom the document was sent;
 - f. a summary of the contents of the document; and
 - g. if any such document was, but is no longer, in your presence, custody or control or is no longer in existence, state whether the document is missing or lost, destroyed, or has been transferred voluntarily or involuntarily.
- The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

GENERAL INSTRUCTIONS

These discovery requests are to be answered with reference to all information in your full or partial possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documentation may be obtained.

To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

If any request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully. If any request appears confusing, please request clarification directly from counsel for Windstream East.

These requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your response to these requests subsequently become known.

For each request, provide the name of your witness(es) or employee(s) or other representative(s) responsible for compiling and providing the information contained in each answer.

Data Requests

DATA REQUEST NO. 1: Provide all work papers, including source documents, supporting AT&T's traffic study provided to Windstream East. Work papers should include, to the extent they exist, all documentation supporting cell site locations, how data was separated between Windstream East-originated and AT&T-originated, how a Windstream East-originated call was determined to terminate within the MTA in which it was originated, how a Windstream East-originated call was determined to terminate outside the MTA in which it was originated, etc.

DATA REQUEST NO. 2: In regards to the text files provided to Windstream East by AT&T in support of the traffic study, detail and define with specificity any and all column headings, including, but not limited to:

- a. DATESTARTOFCHARGING
- b. RECORDTYPE
- c. SUBSTR(A_MSISDN, 2, 6)
- d. SUBSTR(B_MSISDN, 2, 6)
- e. FIRSTCGI
- f. CHARGEABLEDURATION
- g. LANDLINE_MTA
- h. LANDLINE_STATE
- i. LANDLINE_OCN
- j. LANDLINE_OCN_NAME
- k. LANDLINE_RATECENTER
- l. ATT_MTA
- m. ATT_STATE
- n. ATT_NAME
- o. ATT_OCN
- p. ATT_OCN_NAME
- q. ATT_RATECENTER
- r. CGI_MTA

- s. CGI_STATE
- t. CGI_COUNTY
- u. RATECENTER_MATCH

DATA REQUEST NO. 3: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine if a particular call was originated by a Windstream East end user.

DATA REQUEST NO. 4: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine in which MTA calls originate.

DATA REQUEST NO. 5: Explain in detail the method and identify the programs and specific methods of calculation employed by AT&T in its traffic study to determine in which MTA calls terminate.

DATA REQUEST NO. 6: Regarding the calls that AT&T has identified in its traffic study as being originated by Windstream East, are the calls limited to only seven digit dialed calls or ten digit dialed calls, *i.e.*, not 1+ dialed calls?

DATA REQUEST NO. 7: Identify the trunk group(s), circuit ID(s), and Windstream East end office/tandem(s) associated with the trunk group(s) that were used to record the traffic included in the traffic study provided to Windstream East.

DATA REQUEST NO. 8: Identify in detail each and every person (including but not limited to name, title, area of responsibility and name of employer) that was involved in the production, review, analysis, or any other aspect of the traffic study provided to Windstream East.

DATA REQUEST NO. 9: Please identify “LGR”, who is listed as the provider of the data in the traffic study provided to Windstream East.

DATA REQUEST NO. 10: Please identify how LGR obtained the data included in the traffic study provided to Windstream East.

DATA REQUEST NO. 11: Please identify “CSS”, who is listed as the provider of the cell site information in the traffic study provided to Windstream East.

DATA REQUEST NO. 12: Please identify how CSS obtained the cell site information included in the traffic study provided to Windstream East.

Requests for Admission

RFA NO. 1: Please admit that AT&T included only calls originated by Windstream East end users in the traffic study provided to Windstream East.

RFA NO. 2: Please admit that, although LERG may identify one particular block of numbers as belonging to Windstream East, because of local number portability any given number within that block may actually be being used by another carrier other than Windstream East.

RFA NO. 3: Please admit that Windstream East identified the following items as being required for a valid traffic study to be conducted by AT&T:

- a. Originating NPA/NXX/line number
- b. Terminating NPA/NXX/line number
- c. Call duration
- d. Date and time of call
- e. For calls terminated to AT&T customers on AT&T’s network, the last cell site
- f. For calls terminated to AT&T customers on other CMRS providers’ networks, the last cell site
- g. Detail regarding the location of any and all cell sites used in the transmission of the calls

- h. Study must encompass at least 7 consecutive days without holidays or other anomalies that might skew the traffic study
- i. Any and all work papers used in the development of the traffic study
- j. Identification of all personnel participating in the development of the traffic study
- k. All calls to AT&T NPA/NXX/line numbers associated with the MTA that originate from Windstream East NPA/NXX/line numbers associated with the same MTA
- l. Local routing number

RFA NO. 4: Please admit that AT&T provided originating NPA/NXX but not line numbers in the traffic study provided to Windstream East.

RFA NO. 5: Please admit that AT&T provided terminating NPA/NXX but not line numbers in the traffic study provided to Windstream East.

RFA NO. 6: Please admit that Local Number Portability allows for an individual telephone number to be moved/ported from one carrier to another.

RFA NO. 7: Please admit that the AT&T traffic study provided to Windstream East does not include calls terminated to AT&T customers who are roaming on other CMRS providers' networks.

RFA NO. 8: Please admit that AT&T has not provided details regarding the location of any and all cell sites used in the transmission of the calls in the traffic study provided to Windstream East.

RFA NO. 9: Please admit that AT&T has not provided any or all work papers used in the development of the traffic study provided to Windstream East.

RFA NO. 10: Please admit that AT&T has not included the local routing number of the calls in the traffic study provided to Windstream East.

RFA NO. 11: Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, a call from a Windstream East customer with, for example, a Lexington, KY rate-centered number to

an AT&T customer with a Lexington, KY rate-centered number should be delivered by Windstream East to AT&T in KY over the interconnection facilities in place between the companies.

RFA NO. 12: Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, a call from an AT&T customer with, for example, a Lexington, KY rate-centered number to a Windstream East customer with a Lexington, KY rate-centered number should be delivered by AT&T to Windstream East in KY over the interconnection facilities in place between the companies.

RFA NO. 13: Please refer to the call identified in RFA No. 11. Please admit that pursuant to the terms and conditions of the interconnection agreement between AT&T and Windstream East, Windstream East should deliver the call to AT&T over the interconnection facilities in place between the companies regardless of whether the AT&T customer is in Lexington, KY, New York, NY or any other location.

RFA NO. 14: Please refer to the call identified in RFA No. 11. Please admit that it is AT&T's responsibility to deliver the call from the point where Windstream East hands the call to AT&T to the AT&T end user.

Date: AUGUST 12, 2010

Respectfully Submitted,

By: Robert C. Moore

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent via first class mail, postage pre-paid, on Jeff R. Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602-0615, 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.

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