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May 20, 2010

RECEIVED

MAY 20 2010

PUBLIC SERVICE  
COMMISSION

**VIA HAND DELIVERY**

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

Re: *In the Matter of Communications Venture Corporation, d/b/a INdigital  
Telecom for Arbitration of Certain Terms and Conditions of Proposed  
Interconnection Agreement with BellSouth Telecommunications, Inc., d/b/a  
AT&T Kentucky – Case No. 2009-00438*

Dear Mr. Derouen:

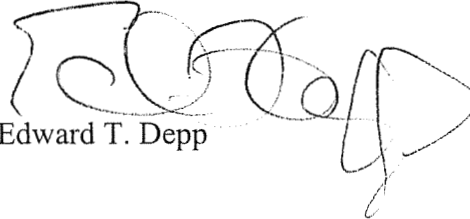
In accordance with the Public Service Commission of the Commonwealth of Kentucky's (the "Commission") January 25, 2010 Order setting forth a Proposed Procedural Schedule in the above-referenced case, please find enclosed for filing one (1) original and eleven (11) copies of Communications Venture Corporation, d/b/a INdigital Telecom's Second Data Requests to BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky.

Please file-stamp one copy and return it to our delivery person.

Thank you, and if you have any questions please call me.

Sincerely,

DINSMORE & SHOHL LLP



Edward T. Depp

ETD/sdt  
Enclosures  
cc: All parties of record (w/encl.)

Jeff Derouen, Executive Director

April 22, 2010

Page 2

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John E. Selent, Esq. (w/encl.)

Holly C. Wallace, Esq. (w/encl.)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

MAY 20 2010

PUBLIC SERVICE  
COMMISSION

Petition of Communications Venture )  
Corporation, d/b/a INdigital Telecom for )  
Arbitration of Certain Terms and Conditions )  
of Proposed Interconnection Agreement )  
with BellSouth Telecommunications, Inc., )  
d/b/a AT&T Kentucky, Pursuant to the )  
Communications Act of 1934, as Amended )  
by the Telecommunications Act of 1996 )

Case No. 2009-00438

**COMMUNICATIONS VENTURE CORPORATION D/B/A INDIGITAL TELECOM'S  
SECOND DATA REQUESTS TO  
BELLSOUTH TELECOMMUNICATIONS, INC., D/B/A AT&T KENTUCKY**

Communications Venture Corporation, d/b/a INdigital Telecom ("INdigital Telecom"), by counsel, and pursuant to the January 25, 2010 procedural order entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in the above-captioned matter, hereby propounds the following second round of data requests upon BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky").

**REQUEST NO. 1:** In response to Initial Data Request No. 5, AT&T Kentucky states that "there are interconnection agreements between AT&T Kentucky and CLECs where no provision exists that would require the CLEC to pay disputed charges into an interest bearing escrow account until the dispute is resolved." Please identify and produce all such agreements.

**RESPONSE:**

**REQUEST NO. 2:** Admit that the AT&T Kentucky affiliate ILEC providing service in North Carolina has entered into an interconnection, EAS, traffic exchange, or commercial agreement with a competitive 911/E911 service provider in North Carolina. If admitted, please identify and produce all such agreements.

**RESPONSE:**

**REQUEST NO. 3:** Admit that the AT&T Kentucky affiliate ILEC providing service in Ohio has entered into an interconnection, EAS, traffic exchange, or commercial agreement with a competitive 911/E911 service provider in Ohio. If admitted, please identify and produce all such agreements.

**RESPONSE:**

**REQUEST NO. 4:** In response to Initial Data Request No. 26, AT&T Kentucky states that the five percent (5%) threshold trigger for a follow up audit as proposed in Section 14.1 and 14.8 of the General Terms and Conditions "has been accepted by many CLECs as a reasonable threshold." With respect to Kentucky, please identify the CLECs that have not accepted the 5% threshold as reasonable, identify the specific threshold implemented in their agreements, and produce all such agreements.

**RESPONSE:**

**REQUEST NO. 5:** Admit that AT&T Kentucky's Commission-approved rates for its provision of certain 911/E911 related services, including but not limited to access to 911 and E911 Databases, are based upon AT&T Kentucky's costs for providing such services and that such costs would likely be different for INdigital Telecom. If you do not so admit, explain in detail the basis for your denial.

**RESPONSE:**

**REQUEST NO. 6:** In response to Initial Data Request No. 19, AT&T Kentucky states that "[a]bsent any justification for applying different rates between interconnecting carriers, like rates should apply for like services." Admit that a Commission-approved tariff authorizing INdigital Telecom to use different rates in its provision of 911/E911 services would serve as such justification. If you do not so admit, explain in detail the basis for your denial.

**RESPONSE:**

**REQUEST NO. 7:** In response to Initial Data Requests No. 1, No. 20, and No. 21, AT&T Kentucky states that it "follows industry standard practices for routing 911/E911 calls." Please identify the basis for determining that AT&T Kentucky's 911/E911 routing practices are "industry standard" and identify and produce all documentation and/or other industry-accepted guidelines that support this determination.

**RESPONSE:**

**REQUEST NO. 8:** Identify the specific software programs that AT&T Kentucky utilizes in its routers to perform the switching and/or routing function(s) for 911/E911 calls. In your identification, include the maker of the software program, the name of the software program, the date the software was installed, the most recent date on which the software was updated, and describe and produce all internal policies regarding updates to the software.

**RESPONSE:**

**REQUEST NO. 9:** In response to Initial Data Request No. 24, AT&T Kentucky states that the costs associated with written requests for information regarding facilities is based upon "[t]ime spent by the AT&T employee locating the appropriate records, research, review and copy of those records." Please identify and describe in detail the safeguards, and/or time accounting and expense accounting practices that AT&T Kentucky has in place to ensure that the costs associated with the AT&T employee's efforts are reasonable. In addition, please identify the benchmark(s) by which AT&T Kentucky determines the reasonableness of such charges, costs, and/or expenses.

**RESPONSE:**

**REQUEST NO. 10:** In response to Initial Data Request No. 15, AT&T Kentucky states that it uses "industry standard practices" when interconnecting its network with that of other carriers that may serve PSAPs that act as the public safety answering point for end-user customers of AT&T Kentucky. Please identify the basis for determining that AT&T Kentucky's interconnection practices

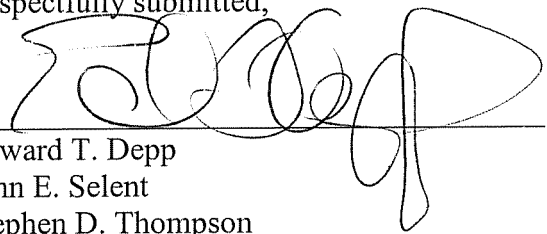
are "industry standard" and identify and produce all documentation and/or other industry-accepted guidelines that support this determination.

**RESPONSE:**

**REQUEST NO. 11:** In response to Initial Data Request No. 15, AT&T Kentucky explains how it interconnects its network with that of other carriers who may serve PSAPs that act as the public safety answering point for end-user customers of AT&T Kentucky. Produce all such agreements by which AT&T Kentucky interconnects its network for the routing of 911/E911 calls to other carriers who serve PSAPs that act as the public safety answering point for end-user customers of AT&T Kentucky.

**RESPONSE:**

Respectfully submitted,



Edward T. Depp  
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Stephen D. Thompson  
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500 West Jefferson Street  
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(502) 585-2207 (Facsimile)

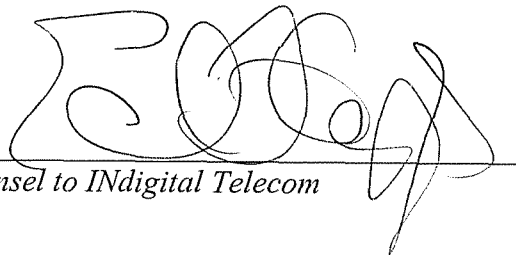
*Counsel to INdigital Telecom*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by U.S. First Class mail and electronic mail on this 20th day of May, 2010, to the following individuals:

Mary K. Keyer, Esq.  
AT&T Kentucky  
601 West Chestnut Street  
Room 407  
Louisville, Kentucky 40203  
mk3978@att.com  
*General Counsel of AT&T Kentucky*

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