

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH	)	
TELECOMMUNICATIONS, LLC FOR	)	
DECLARATORY ORDER REGARDING	)	CASE NO.
INTERCONNECTION WITH CENTRAL	)	2015-00227
KENTUCKY NETWORK FOR 911/E911	)	
SERVICES TO PUBLIC SAFETY	)	
ANSWERING POINTS	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

Lexington-Fayette Urban County Government ("LFUCG"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before August 3, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LFUCG shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which LFUCG fails or refuses to furnish all or part of the requested information, LFUCG shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, LFUCG shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to BellSouth Telecommunications, LLC d/b/a AT&T Kentucky's ("AT&T Kentucky") response to LFUCG's Initial Request for Information, Item 1, where LFUCG states that each Central Kentucky Network ("CKN") member was provided sample letters to submit to telephone service providers operating in the members' respective jurisdictions that request new trunking be connected to CKN.

a. Were the letters submitted to other telephone service providers in addition to AT&T Kentucky?

b. If the letters were submitted to telephone service providers in addition to AT&T Kentucky:

(1) Identify the telephone service providers to whom the letters were submitted.

(2) State whether new trunking was provided per the request, and, if new trunking was provided, identify the telephone service provider.

(3) If new trunking was provided, state the length of time the requested new trunking has been in operation.

(4) If new trunking was provided, explain whether there is a contractual agreement between the telephone service provider and the CKN member for the new trunking, or if the new trunking is provided pursuant to a tariff.

(5) If the new trunking was denied, provide the reasons for denial.



Talina R. Mathews  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED       **JUL 14 2016**      

cc: Parties of Record

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KENTUCKY 40601-8204

\*J. Tyson Covey  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, ILLINOIS 60606

\*Melissa M Murphy  
Senior Attorney  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

\*Cheryl Winn  
Waters Law Group, PLLC  
12802 Townepark Way, Suite 200  
Louisville, KENTUCKY 40243

\*Jennifer Black Hans  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KENTUCKY 40601-8204

\*Patrick M Crotty  
Corporate Counsel  
Cincinnati Bell Telephone Co. LLC  
221 East Fourth Street, Suite 1090  
Cincinnati, OHIO 45202

\*Honorable David J. Barberie  
Managing Attorney  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

\*Joseph Granville Clark, Jr.  
Clark Law Office  
175 West 4th Street  
P.O. Box 113  
Russellville, KENTUCKY 42276

\*Ted Heckman  
Managing Director, Regulatory & Government  
Cincinnati Bell Telephone Company  
221 E Fourth Street, Room 103-1170  
Cincinnati, OH 45202

\*Dennis G Friedman  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, ILLINOIS 60606

\*Janet M Graham  
Commissioner of Law  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

\*BellSouth Telecommunications, LLC dba AT&T  
601 W Chestnut Street  
4th Floor East  
Louisville, KY 40203

\*John Wilson  
Garrard County Judge/Executive  
15 Public Square  
Lancaster, KENTUCKY 40444

\*Honorable Linda K Ain  
General Counsel  
Kentucky Regional Cable Commission  
4725 Inman Drive  
Lexington, KENTUCKY 40513

\*William Fogle  
Attorney to the CMRS Board  
200 Mero Street  
Frankfort, KENTUCKY 40601

\*Greg A Hale  
General Manager/Executive VP  
Logan Telephone Cooperative, Inc.  
10725 Bowling Green Road  
P. O. Box 97  
Auburn, KY 42206

\*Lisa K Nally-Martin  
Office of the Marion County Attorney  
104 West Main street, Box 678  
Lebanon, KENTUCKY 40033

\*Brian T Goettl  
Jessamine County Attorney  
117 South Main Street, Suite 100  
Nicholasville, KENTUCKY 40356

\*Mark D Guilfoyle  
Dressman, Benzinger & LaVelle, PSC  
207 Thomas More Parkway  
Crestview Hills, KENTUCKY 41017-2596