

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ASSOCIATES IN DERMATOLOGY, PLLC	)	
	)	
COMPLAINANT	)	
V.	)	CASE NO.
	)	2019-00047
BELLSOUTH TELECOMMUNICATIONS, LLC	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO ASSOCIATES IN DERMATOLOGY, PLLC

Associates in Dermatology, PLLC (Associates in Dermatology), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on or before February 3, 2020. 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 the 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 the 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.

Associates in Dermatology 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 Associates in Dermatology fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Associates in Dermatology 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 Associates in Dermatology's response to the requests for information attached as Appendix B to the December 3, 2019 Order (Requests to Associates in Dermatology), Appendix 4, or "AID - 4."

a. Confirm that the telephone numbers to which those bills apply all have an 812 area code.

b. State whether the service to which those bills apply was provided in Kentucky or in Indiana, and explain each basis for the response.

c. State whether Associates in Dermatology received basic local exchange service or analog telephone service in Kentucky, and if so, identify when that

service was provided, identify the location at which the service was provided, and provide any bills for that service (redact the telephone numbers from which Associates in Dermatology received any calls or to which it made any calls in any call log).

2. Refer to Bellsouth Telecommunications, LLC dba AT&T Kentucky's (AT&T Kentucky) response to the requests for information attached as Appendix A to the December 3, 2019 Order (Requests to AT&T Kentucky), Item 18. State whether Associates in Dermatology disputes that its contract with AT&T Kentucky contains an arbitration clause as alleged by AT&T Kentucky, and if so, state each basis for disputing that the contract contains an arbitration clause without regard to the legal effect of the arbitration clause.

3. Refer to Associates in Dermatology's response to the Requests to Associates in Dermatology, Item 8, and Appendix 5. Identify those portions of the amounts that Associates in Dermatology contends it overpaid that were for service in Kentucky, those portions that were for service in Indiana, and those portions that were for service in both Kentucky and Indiana.

4. State whether Associates in Dermatology contends that the Commission would have the authority to require repayment of amounts overpaid due to a violation of the federal truth in billing regulations assuming that such a violation occurred, and that it resulted in an overpayment.

5. Provide any additional evidence, if any, that Associates in Dermatology believes is necessary to support its assertion that the Commission has subject matter jurisdiction over this matter.



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Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED           JAN 21 2020          

cc: Parties of Record

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