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ATTORNEYS

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February 8, 2007

RECEIVED

FEB 09 2007

PUBLIC SERVICE
COMMISSION

Via Federal Express

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: *In the Matter of: BellSouth Telecommunications, Inc. v. Brandenburg Telephone Company, Case No. 2006-00546*

Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Brandenburg Telephone Company's Data Requests. Please return a file-stamped copy in the self-addressed, postage prepaid envelope furnished herewith.

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

Sincerely,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk
Enclosures

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

FEB 09 2007

BELLSOUTH TELECOMMUNICATIONS, INC.)

COMPLAINANT)

v.)

BRANDENBURG TELEPHONE COMPANY)

DEFENDANT)

PUBLIC SERVICE
COMMISSION

CASE NO. 2006-00546

DATA REQUESTS

Brandenburg Telephone Company ("Brandenburg"), by counsel, and pursuant to the January 24, 2007 Order of the Public Service Commission of the Commonwealth of Kentucky ("the Commission"), hereby submits its data requests to BellSouth Telecommunications, Inc. ("BellSouth").

REQUEST NO. 1: State with specificity the date BellSouth first notified Brandenburg that it would begin terminating "ACS Traffic" to Brandenburg.

RESPONSE:

REQUEST NO. 2: State with specificity when BellSouth first started terminating "ACS Traffic" to Brandenburg.

RESPONSE:

REQUEST NO. 3: In its Complaint, BellSouth identifies ACS Traffic as "Area Calling Service traffic." In its reply to Brandenburg's Answer, however, BellSouth states: "The term 'ACS Traffic'

as used in this docket is a generic term that includes Area Plus traffic and should not be confused with BellSouth's traditional Area Calling Service plans set forth in BellSouth's Price List." Please explain the apparent discrepancy between these two statements and identify with specificity and in detail the traffic (other than CMRS traffic) for which BellSouth alleges it overpaid Brandenburg.

RESPONSE:

REQUEST NO. 4: Please identify any and all trunk groups over which BellSouth terminates traffic to Brandenburg.

RESPONSE:

REQUEST NO. 5: In its reply to Brandenburg's Answer, BellSouth states that ACS Traffic is routed over the Common Transport Trunk Group. Please state each and every fact that supports BellSouth's assertion that ACS Traffic is routed over the Common Transport Trunk Group.

RESPONSE:

REQUEST NO. 6: Please provide any and all documentation in the possession of BellSouth or its agents demonstrating or refuting that BellSouth does not currently deliver, and/or has never delivered, ACS Traffic for termination to Brandenburg over any other trunk group than the Common Transport Trunk Group.

RESPONSE:

REQUEST NO. 7: From April 2004 to the present, has BellSouth terminated ACS Traffic to Brandenburg over the Common Transport Trunk Group? If not, specify how BellSouth has terminated ACS Traffic to Brandenburg.

RESPONSE:

REQUEST NO. 8: Please identify each and every month when BellSouth routed ACS Traffic to Brandenburg through any facilities other than the Common Transport Trunk Group. For each, identify with specificity how BellSouth routed the ACS Traffic to Brandenburg.

RESPONSE:

REQUEST NO. 9: State each and every fact that supports BellSouth's claim that it overpaid Brandenburg for terminating ACS Traffic.

RESPONSE:

REQUEST NO. 10: Provide any and all documentation, including call detail records, in the possession of BellSouth or its agents that either supports or refutes BellSouth's claim that BellSouth overpaid for terminating ACS Traffic.

RESPONSE:

REQUEST NO. 11: State each and every fact that supports BellSouth's claim that Brandenburg violated Section 2.07 of the statewide CMRS Agreement as alleged in Paragraph 13 of BellSouth's Complaint.

RESPONSE:

REQUEST NO. 12: State each and every fact that supports BellSouth's claim that BellSouth overpaid Brandenburg for Covered CMRS Provider Traffic.

RESPONSE:

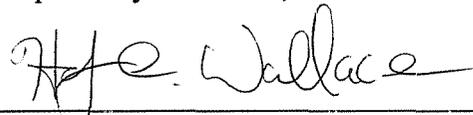
REQUEST NO. 13: Provide any and all documentation, including call detail records, in the possession of BellSouth or its agents that either supports or refutes BellSouth's claim that BellSouth overpaid for Covered CMRS Provider Traffic.

RESPONSE:

REQUEST NO. 14: Provide the specific EMI records for any and all Covered CMRS Provider Traffic for which BellSouth alleges it did not receive proper crediting of minutes by Brandenburg.

RESPONSE:

Respectfully submitted,



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Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

SK I hereby certify a true and accurate copy of the foregoing was served on the following this day of February, 2007:

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Counsel for BellSouth Telecommunications, Inc.

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