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Attachment A

Public Version of Explanatory Document

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EXPLANATORY ATTACHMENT

Windstream has both ILEC and CLEC Affiliates.

| Provider Type | Sections to Which Responded |
|------------------------------------|------------------------------------|
| Competitive Provider Affiliates | II.A, II.D |
| ILEC Affiliates | II.B, II.C |
| Both ILEC and Competitive Provider | II.F |

| Competitive Provider Affiliate | FRN |
|---|------------|
| Bishop Communications Corporation | 0003911385 |
| Cavalier Telephone Mid-Atlantic, L.L.C. | 0015799133 |
| Cavalier Telephone, L.L.C. | 0003757275 |
| Intellifiber Networks, LLC | 0013102439 |
| LDMI Telecommunications, LLC | 0004371043 |
| McLeodUSA Telecommunications Services, L.L.C. | 0003716073 |
| Network Telephone, LLC | 0004071262 |
| PaeTec Communications, LLC | 0011017795 |
| Talk America, Inc. | 0004319430 |
| US LEC Communications LLC | 0008775157 |
| US LEC of Alabama LLC | 0023894892 |
| US LEC of Florida LLC | 0004987814 |
| US LEC of Georgia LLC | 0004987848 |
| US LEC of Maryland LLC | 0004987798 |
| US LEC of North Carolina LLC | 0004987707 |
| US LEC of Pennsylvania LLC | 0004987715 |
| US LEC of South Carolina LLC | 0004987780 |
| US LEC of Tennessee LLC | 0004987723 |
| US LEC of Virginia LLC | 0004987764 |
| Windstream Communications Telecom, LLC | 0004941142 |
| Windstream Communications, LLC | 0014409924 |
| Windstream D&E Systems, LLC | 0003735776 |
| Windstream Direct, LLC | 0003738432 |
| Windstream EN-TEL, LLC | 0003738465 |
| Windstream Iowa-Comm, LLC | 0005089446 |
| Windstream IT-Comm, LLC | 0013623335 |
| Windstream KDL, LLC | 0004565008 |
| Windstream Lakedale Link, Inc. | 0003738424 |

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| Competitive Provider Affiliate | FRN |
|---------------------------------------|------------|
| Windstream Norlight, LLC | 0007345754 |
| Windstream NorthStar, LLC | 0018879585 |
| Windstream NuVox Arkansas, LLC | 0004944187 |
| Windstream NuVox Illinois, LLC | 0004944302 |
| Windstream NuVox Indiana, LLC | 0004946091 |
| Windstream NuVox Kansas, LLC | 0004944229 |
| Windstream NuVox Missouri, LLC | 0004944245 |
| Windstream NuVox Ohio, LLC | 0004945457 |
| Windstream NuVox Oklahoma, LLC | 0004944260 |
| Windstream NuVox, LLC | 0004319414 |
| Windstream of the Midwest, Inc. | 0004986147 |
| Windstream SHAL Networks, Inc. | 0012348264 |
| Windstream SHAL, LLC | 0012263653 |

| ILEC Affiliates | FRN |
|---|------------|
| Georgia Windstream, LLC | 0004967741 |
| Oklahoma Windstream, LLC | 0004966552 |
| Texas Windstream, LLC | 0004967808 |
| Valor Telcommunications of Texas, LLC | 0003783123 |
| Windstream Accucomm Telecommunications, LLC | 0001856145 |
| Windstream Alabama, LLC | 0004966594 |
| Windstream Arkansas, LLC | 0006580518 |
| Windstream Buffalo Valley, Inc. | 0008343162 |
| Windstream Communications Kerrville, LLC | 0001687813 |
| Windstream Concord Telephone, LLC | 0003762010 |
| Windstream Conestoga, Inc. | 0005386172 |
| Windstream D&E, Inc. | 0003271871 |
| Windstream Florida, Inc. | 0004967360 |
| Windstream Georgia Communications, LLC | 0004967725 |
| Windstream Georgia Telephone, LLC | 0004967840 |
| Windstream Georgia, LLC | 0004967030 |
| Windstream Iowa Communications, Inc. | 0003911385 |
| Windstream Kentucky East, LLC | 0005095856 |
| Windstream Kentucky West, LLC | 0004967816 |
| Windstream Lakedale, Inc. | 0003738416 |
| Windstream Lexcom Communications, LLC | 0001959758 |

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| | |
|----------------------------------|------------|
| Windstream Mississippi, LLC | 0004967774 |
| Windstream Missouri, Inc. | 0004965992 |
| Windstream Montezuma, LLC | 0003708575 |
| Windstream Nebraska, Inc. | 0004966099 |
| Windstream New York, Inc. | 0004967055 |
| Windstream North Carolina, LLC | 0004967634 |
| Windstream Ohio, Inc. | 0006236608 |
| Windstream Oklahoma, LLC | 0004967790 |
| Windstream Pennsylvania, LLC | 0004967683 |
| Windstream South Carolina, LLC | 0004967014 |
| Windstream Standard, LLC | 0004207239 |
| Windstream Sugar Land, Inc. | 0004967337 |
| Windstream Western Reserve, Inc. | 0004967691 |

II.A.3-4 Location Data for Competitive Providers

Windstream had six retail billing systems and two wholesale billing systems in 2013. Data from these systems has been combined into one aggregate data submission. Dedicated services billed out of these billing systems, primarily the retail systems, do not always link to the provisioning system in a manner that allows for provisioning data to be tied to billing data.

Where a link was possible, the connection information for Table II.A.4 was obtained from the provisioning data. Where provisioning data was not available a site address was used from the billing system. In some cases, the site address in the billing system is a primary site for the customer and all dedicated services for that customer are reported at the primary site location. If a site address was not available in the billing system, the billing information is still reported and the associated location ID is defined as “unknown”. Multiple location IDs were defined with “unknown” address. This was done to allow the location ID to specify city and state even when the street address is unknown. Table II.A.3 – Count of total locations, includes these unknown location IDs in the total. Dedicated services sold to other providers may have connections that are not at an End Users location, but instead at the other providers interconnection point. In those cases, the street address, if available, of the connection with the other provider is listed as the location ID.

Location_Type Assumptions: For customers billed out of our retail billing systems, the location type is assumed to be a building. For customers billed out of our wholesale systems where the customer could be identified as a Wireless provider, the location type was assumed to be a cell site, otherwise location type was assumed to be a building.

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Supplier Type Assumptions:

IRU_Supplier: Windstream is unable to determine the IRU Supplier at a location level. IRU facilities are not separately identifiable in our provisioning systems. We estimated the number of connections per IRU agreement using a count of the segments, assuming at least two segments per IRU agreement. Based on the estimated number of connections in each of our IRU agreements, we calculated that roughly *** BEGIN CONFIDENTIAL *** [REDACTED] *** END CONFIDENTIAL *** of our IRU connections were obtained from a Competitive Provider and *** BEGIN CONFIDENTIAL *** [REDACTED] *** END CONFIDENTIAL *** from an ILEC Provider.

UNE_Supplier/UCL_Supplier: Windstream is able to identify the Dedicated Services purchased as UNE from other providers, but we do not have sufficient documentation to determine if the UNE is fiber or copper. We have populated the UNE_Supplier for the UNE connections but defaulted UCL_Supplier to “unknown”. UNE locations were identified by matching the location ID situs address to the situs address of the purchased UNE. This approach is not perfect and some UNE provided locations may not have been identified by this match.

Sold_bandwidth_total was calculated by summing the bandwidth by circuit for each location as reported in II.A.12.

Sold_bandwidth_enduser is the total bandwidth by circuit reported in II.A.12 for Provider_Type = “0”.

Sold_bandwidth_Mobile is the total bandwidth by circuit reported in II.A.12 for Provider_Type = “1” where the provider is a cellular mobile provider.

Bandwidth_Internal is the total bandwidth by circuit reported in II.A.12 for Provider_Type = “1” where the provider is a Windstream affiliate.

II.A.5. (Fiber Map)

Windstream has provided a fiber map of the existing routes owned by the Windstream Competitive Providers. In response to the request for a list of Fiber Nodes where we interconnect to other providers, the list represents the ILEC central offices we have “lit” for fiber. *** BEGIN CONFIDENTIAL *** [REDACTED]

*** [REDACTED] ***
BEGIN CONFIDENTIAL *** This list does not include carrier collocations, our CLEC switch sites, carrier hotels, huts, etc. This is the complete list of ILEC central offices where we are collocated and have fiber built. At this point, we cannot determine if Metro Ethernet is available

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at the site so headend has been defaulted to N. We cannot determine when these sites went into service and have defaulted Node Year to 2006, the year Windstream was formed.

II.A.12-17 - Competitive Provider Billing Information

II.A.12 Part 1 - Where a link to provisioning data was possible, the bandwidth by circuit was determined from provisioning systems. Where the link was not possible, bandwidth was derived from the information available in the billing code descriptions and other indicators in the billing records. In some cases, the billing code descriptions do not contain any indication of the actual bandwidth of the service, e.g. the billing description “Ethernet Data Circuit”. Where no other information is available to determine actual bandwidth of the dedicated service, the bandwidth is reported as 0.01 Mbps. Actual billed amounts are included in II.A.12 and the revenue summaries reported in II.A.15-17. This was a significant problem for two of the retail billing systems and there are too many individual instances of this occurrence to separately report line numbers in the data. All circuits with bandwidth reported as 0.01 Mbps have unknown bandwidth. This will cause a reduction in the total reported bandwidth by connection in table II.A.4 for the location IDs associated with these circuits.

Term_Discount_IC – Where the billing code indicated a price for a specific term, the term discount plan was assumed to be that term. In most cases, no discounts were provided outside of the bill cycle and the Term_Discount_IC was set to 1. Where specific Term discounts were applied outside of the billing cycle, the Term_Discount_IC was set to “0”.

End_Date for Term Discount Plans is not available in Windstream’s retail billing systems. The Term End Date was assumed to be January 1, 2014 for services that were on a term plan in 2013 but the end date is unknown.

Circuit_ID – For some Windstream retail billing systems, the billing system does not contain an actual circuit ID field and billed revenue is recorded at a consolidated billing code level. For the Windstream Competitive Provider Affiliates, an analysis of the median prices billed by billing code indicates that the billing codes are sufficiently unique to identify a single dedicated service per account.

Circuit_Type for DS1-UNE and DS3_UNE were determined from the Location ID. Where a DS1 or DS3 was sold at an address that was previously identified as a UNE provided location, the billing information was marked as UNE.

II.A.12 Part2 Customer List

Where a unique customer could be identified across multiple accounts in the same system, Windstream combined those accounts and assigned only one customer ID for reporting purposes. However, for End User Customers, it is often difficult to determine if multiple

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accounts with similar names are actually related and should be counted as a single customer. Where Windstream was unsure, we left the accounts identified as separate customer IDS. It is possible that some customers are assigned more than one customer ID and will be counted as multiple unique customers.

II.A.2, 3, 4, 12, 13, 14 (Determination of Extent to Which Particular Connections Were Owned, Leased under an IRU, or Obtained as UNE)

As described throughout Windstream’s data submission, Windstream is made up of dozens of ILECs and Competitive Providers (CLECs) that have been acquired at various times over the last several years. *** BEGIN CONFIDENTIAL ***

[REDACTED]

[REDACTED]

[REDACTED] *** END

CONFIDENTIAL ***

II.B.3 – ILEC Affiliates Location Information

II.B.2-3 Location Data for ILEC Affiliates

Windstream ILEC Affiliates had one retail billing system and one wholesale billing systems in 2013. Data from these systems has been combined into one aggregate response to this data request. Dedicated services billed out of these billing systems do not always link to the provisioning system in a way to allows for provisioning data to be tied to billing data.

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Where a link was possible, the connection information for Table II.B.3 was obtained from the provisioning data. Where provisioning data was not available a site address was used from the billing system. In some cases, the site address in the billing system is a primary site for the customer and all dedicated services for that customer are reported at the same primary site location. If a site address was not available in the billing system, the billing information is still reported and the associated location ID is defined as “unknown”. Multiple location IDs were defined with “unknown” address. This was done to allow the location ID to specify city and state even when the street address is unknown. Table II.B.2 – Count of total locations, includes these unknown location IDs in the total. Dedicated services sold to other providers may have connections that are not at an End Users location, but instead at the other provider’s interconnection point. In those cases, the street addresses, if available, of the connection with the other provider is listed as the location ID.

II.B.4 Part 1 ILEC Billing Information

Circuit_ID – The Windstream retail billing system for the ILEC Affiliates does not contain an actual circuit ID field and billed revenue is recorded at a consolidated billing code level. If a single customer has five DS1’s on the same bill, all five with the same billing code, we are not able to separately identify the billed amount per DS1. In those cases, we calculated the Billing Code quantity using the median billed amount by billing code. This approach assumes that the majority of customers have only one dedicated service of a particular circuit type per account so that the median price billed for that billing code would approximate the per unit price. For circuit IDs that begin with an R and the billing code associated with the channel termination charge has a quantity greater than one, we assigned a single circuit ID but we assume that quantity of the specific dedicated service for that customer. Other billed elements for the same type of dedicated service, such as mileage charges, could not be approximated using the median price and therefore the quantity was reported as one even though that billing element may have been associated with multiple circuits on the same account.

II.B.4 Part2 Customer List

Where a unique customer could be identified across multiple accounts, we combined those accounts and assigned only one customer ID for reporting purposes. However, for End User Customers, it is often difficult to determine if multiple accounts with similar names are actually related and should be counted as a single customer. Where Windstream was unsure, we left the accounts identified as separate customer IDS. It is possible that some customers are assigned more than one customer ID and will be counted as multiple unique customers.

II.B.8-11

Revenues were summarized from the billing data provided in II.B.4.

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II.B.12

Customer counts were calculated by counting the number of unique customer accounts with active circuits (DS1 and above) on the Tariffed Pricing Plan as of December 31, 2013. *** BEGIN CONFIDENTIAL ***

*** END CONFIDENTIAL *** Windstream also has a number of pricing plans that were filed in our tariffs in 2013 that were either grandfathered from an acquisition or were simply no longer desired by our customers. These plans show a total customer count of zero.

Customers_Fail is the count of unique customer accounts that were charged an early termination penalty in 2013 due to failure to meet the minimum term for a particular service. The penalty for failure to meet the minimum commitment for the plan only affects the specific service and other services on the plan will retain the discounts for the remaining term.

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Attachment B

Public Version of Response to II.A.5 (CSV File)

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II.A.5. [CSV File]

[The csv file submitted by Windstream in response to II.A.5 is a specially-formatted electronic file containing exclusively highly confidential information. A redacted version of such file would be empty and, therefore, Windstream is filing the instant document as the public version of such file.]

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Attachment C

Public Version of Response to II.A.5 (Shapefile)

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II.A.5. [Shapefile]

[The zipped shapefile submitted by Windstream in response to II.A.5 is a specially-formatted electronic file containing exclusively highly confidential information. A redacted version of such file would be empty and, therefore, Windstream is filing the instant document as the public version of such file.]

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Attachment D

Public Version of Response to II.A.8

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II.A.8. Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

Response: *** BEGIN HIGHLY CONFIDENTIAL ***

[REDACTED]

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*** END HIGHLY

b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

Response: *** BEGIN HIGHLY CONFIDENTIAL ***

[REDACTED] *** END HIGHLY CONFIDENTIAL ***

c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response: *** BEGIN HIGHLY CONFIDENTIAL ***

[REDACTED]

*** END HIGHLY CONFIDENTIAL

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Attachment E

Public Version of Response to II.A.10 (Document 3 of 6)



Windstream IP VPN

[REDACTED -- FOR PUBLIC INSPECTION]

REDACTED – FOR PUBLIC INSPECTION

[Each of the 26 substantive pages of this document following the cover page is confidential and has been redacted in its entirety. This page serves as a single replacement for each such page.]

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Attachment F

Public Version of Response to II.A.10 (Document 4 of 6)

Windstream MPLS Networking

[REDACTED -- FOR PUBLIC INSPECTION]

REDACTED – FOR PUBLIC INSPECTION

[Each of the 14 substantive pages of this document following the cover page is confidential and has been redacted in its entirety. This page serves as a single replacement for each such page.]

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Attachment G

Public Version of Response to II.A.10 (Document 6 of 6)

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[Each of pages 2 through 896 of this document entirely highly confidential except for the non-redacted column headings, which are identical to those on the first page. This page serves as a single replacement for each of pages 2 through 896.]

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Attachment H

Public Version of Response to II.A.19

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II.A.19. Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer for the sale of Dedicated Services.

Response: *** BEGIN HIGHLY CONFIDENTIAL *** [REDACTED]
[REDACTED] *** END HIGHLY
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Attachment I

Public Version of Response to II.C.1.c-d Part 1

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[Each of the remaining 60 pages of this document is entirely highly confidential except for the column headings, which are identical to those on the first page. This page serves as a single replacement for each remaining page.]

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Attachment J

Public Version of Response to II.C.1.c-d Part 2

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| County_ID | Sum_Bandwidth | MinPrice_Range | MaxPrice_Range | Price_Territory | Year |
|-----------|---------------|----------------|----------------|-----------------|------|
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Attachment K

Public Version of Response to II.D.1

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II.D.1. Describe your company’s short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: *** BEGIN HIGHLY CONFIDENTIAL ***

[REDACTED]

[REDACTED]

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Attachment L

Public Version of Response to II.F.11

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II.F.11. For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing End-User Channel Terminations from one Provider of Dedicated Services to another.

Response: *** BEGIN HIGHLY CONFIDENTIAL ***

CONFIDENTIAL ***

*** END HIGHLY