

**CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDERS IN WC  
DOCKET NO. 05-25 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**EXPLANATORY ATTACHMENT (FIRST REVISED)**

Windstream has both ILEC and CLEC Affiliates.

<b>Provider Type</b>	<b>Sections to Which Responded</b>
Competitive Provider Affiliates	II.A, II.D
ILEC Affiliates	II.B, II.C
Both ILEC and Competitive Provider	II.F

<b>Competitive Provider Affiliate</b>	<b>FRN</b>
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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<b>Competitive Provider Affiliate</b>	<b>FRN</b>
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

<b>ILEC Affiliates</b>	<b>FRN</b>
Georgia Windstream, LLC	0004967741
Oklahoma Windstream, LLC	0004966552
Texas Windstream, LLC	0004967808
Valor Telecommunications 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.

Customer locations used in Table II.A.4 were based on Windstream’s provisioning data wherever possible. Where provisioning was not available for individual site addresses, Windstream used any location data that were available in Windstream’s billing systems. 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 provider’s interconnection point. In those cases, the street address, if available, of the connection with the other provider is listed as the location ID.

Of course, not all customer locations to which Windstream sells Dedicated services are reportable under Tables II.A.3 and II.A.4 because some are not served either by facilities owned by Windstream, leased as UNEs/UCLs, or leased as IRUs – that is, they are leased as special access service via tariff and/or commercial agreement from an incumbent or competitive local exchange carrier. \*\*\* BEGIN CONFIDENTIAL \*\*\*





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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.

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

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interconnect to other providers, the list represents the ILEC central offices we have “lit” for fiber. \*\*\* BEGIN CONFIDENTIAL \*\*\*

[REDACTED]

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END 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 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.

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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 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

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**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.

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

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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.

**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. \*\*\*  
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\*\*\* 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.