STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE:

State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2009 - 326 - C

(Please type or print)


**Submitted by:** Peg Fox

**Address:** McNair Law Firm, P.A.
P O Box 11390
Columbia, SC 29211

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**Other:**

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition**

☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

| INDUSTRY (Check one) | NATURE OF ACTION (Check all that apply) | | |
|---|---|---|---|
| ☐ Electric | ☐ Affidavit | ☒ Letter | ☐ Request |
| ☐ Electric/Gas | ☐ Agreement | ☐ Memorandum | ☐ Request for Certification |
| ☐ Electric/Telecommunications | ☐ Answer | ☐ Motion | ☐ Request for Investigation |
| ☐ Electric/Water | ☐ Appellate Review | ☐ Objection | ☐ Resale Agreement |
| ☐ Electric/Water/Telecom. | ☐ Application | ☐ Petition | ☐ Resale Amendment |
| ☐ Electric/Water/Sewer | ☐ Brief | ☐ Petition for Reconsideration | ☐ Reservation Letter |
| ☐ Gas | ☐ Certificate | ☐ Petition for Rulemaking | ☐ Response |
| ☐ Railroad | ☐ Comments | ☐ Petition for Rule to Show Cause | ☐ Response to Discovery |
| ☐ Sewer | ☐ Complaint | ☐ Petition to Intervene | ☐ Return to Petition |
| ☒ Telecommunications | ☐ Consent Order | ☐ Petition to Intervene Out of Time | ☐ Stipulation |
| ☐ Transportation | ☒ Discovery | ☐ Prefiled Testimony | ☐ Subpoena |
| ☐ Water | ☐ Exhibit | ☐ Promotion | ☐ Tariff |
| ☐ Water/Sewer | ☐ Expedited Consideration | ☐ Proposed Oder | ☒ Other: SCTC 1st Interrog Discovery |
| ☐ Administrative Matter | ☐ Interconnection Agreement | ☐ Protest | |
| ☐ Other: | ☐ Interconnection Amendment | ☐ Publisher's Affidavit | |
| | ☐ Late-Filed Exhibit | ☐ Report | |

Print Form  Reset Form

MCNAIR
ATTORNEYS

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T (803) 799-9800
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September 15, 2009

***via Electronic Filing***

Charles L.A. Terreni, Esquire
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

***Re: State Universal Service Support of Basic Local Service Included In a Bundled Service Offering or Contract Offering Docket No. 2009-326-C***

Dear Mr. Terreni:

Submitted for filing on behalf of the South Carolina Telephone Coalition (SCTC) is SCTC's First Set of Interrogatories and Requests for Production to the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated, with a copy of same being mailed this date to all parties of record.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

M. John Bowen, Jr.

MJBjr:bw
Enclosure

McNair Law Firm, P. A.
The Tower at 1301 Gervais
1301 Gervais Street
11th Floor
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2009-326-C

| | |
|---|---|
| IN RE: | ) |
| | ) |
| State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering | ) |
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**SOUTH CAROLINA TELEPHONE COALITION'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO THE SOUTH CAROLINA CABLE TELEVISION ASSOCIATION, COMPSOUTH, tw telecom of south carolina llc, AND NUVOX COMMUNICATIONS INCORPORATED**

The South Carolina Telephone Coalition ("SCTC"), by and through its undersigned counsel, hereby submits the within interrogatories and requests for production to the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated (collectively "CLECs").

IT IS HEREIN REQUESTED:

A. That all information shall be provided to the undersigned in the format requested.

B. That all responses to the below requests shall be labeled using the same number as used herein.

C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the Interrogatory in the appropriate sequence.

D. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

E. That all exhibits be reduced to 8-1/2" x 11" format.

F. That, if the requested information exceeds twenty-five (25) pages in length, the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.

G. That, in addition to the signature and verification at the close of CLECs' response, the person responsible for the information contained in each answer be indicated.

H. That each of these Interrogatories be reproduced at the beginning of each of the responses.

I. That the responses be sent to:

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
1301 Gervais Street
Columbia, SC 29201
Post Office Box 11390 (ZIP 29211)

J. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.

K. These Interrogatories shall be deemed continuing so as to require CLECs to supplement or amend their responses as any additional information becomes available.

## DISCOVERY REQUESTS

### INTERROGATORY NO. 1-1

Please list the members of the South Carolina Cable Television Association. For each member, please list the city and state of its principle headquarters. List the parent of each member (if it has a parent) and the city and state of the parent's principle headquarters.

**INTERROGATORY NO. 1-2**

Please designate which of the members listed in response to Interrogatory No. 1-1 above are incumbent local exchange carriers or affiliates of incumbent local exchange carriers. If there are no such members, is there a prohibition on such entities joining the South Carolina Cable Television Association?

**INTERROGATORY NO. 1-3**

Please list the members of CompSouth. For each member, please list the city and state of its principle headquarters. List the parent of each member (if it has a parent) and the city and state of the parent's principle headquarters.

**INTERROGATORY NO. 1-4**

For each member of the South Carolina Cable Television Association, each member of CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated (collectively referred to in these interrogatory requests as the "Individual CLECs," and each separately referred to as an "Individual CLEC"), please list any affiliates that provide communications services (including voice, data, and video services) in South Carolina.

**INTERROGATORY NO. 1-5**

Please provide the following information for each Individual CLECs and its affilates listed in Interrogatory No. 1- 1 above:

a. Number of residential customers in South Carolina.

b. Number of single-line business customers in South Carolina.

c. Number of residential customers in South Carolina that subscribe to two or more products or services from the Individual CLEC and/or its affiliate(s).

d. Number of single-line business customers in South Carolina that subscribe to two or more products or services from the Individual CLEC and/or its affiliate(s).

e. Number of residential customers in South Carolina that receive services pursuant to a contract with the Individual CLEC and/or its affiliate(s).

f. Number of single-line business customers in South Carolina that receive services pursuant to a contract with the Individual CLEC and/or its affiliate(s).

g. Number of residential customers in South Carolina that receive voice services from the Individual CLEC and/or its affiliate(s).

h. Number of single-line business customers in South Carolina that receive voice services from the Individual CLEC and/or its affiliate(s).

i. Number of residential customers in South Carolina that receive voice services from the Individual CLEC and/or its affiliate(s) on a stand-alone basis without subscribing to additional products or services.

j. Number of single-line business customers in South Carolina that receive voice services from the Individual CLEC and/or its affiliate(s) on a stand-alone basis without subscribing to additional products or services.

**INTERROGATORY NO. 1-6**

Please provide the gross revenues from South Carolina operations for each Individual CLEC and the revenues of any affiliates that provide communications services (including voice, data, and video services) in South Carolina.

**INTERROGATORY NO. 1-7**

Please identify the service area within South Carolina of each Individual CLEC and its affiliates that provide communications services (including voice, data, and video) in South Carolina, and produce any maps reflecting the respective service areas.

**INTERROGATORY NO. 1-8**

Please list the states in which each Individual CLEC and its affiliates operate.

**INTERROGATORY NO. 1-9**

Please list the rates charged by service type for each Individual CLEC and its affiliates in South Carolina, and designate whether the rates charged vary by service area within South Carolina.

**INTERROGATORY NO. 1-10**

Please provide the amounts paid into the South Carolina Universal Service Fund by each Individual CLEC and its affiliates, by year, for the years 2003, 2004, 2005, 2006, 2007, and 2008.

Respectfully Submitted,

By: _____

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P. A.
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Columbia, South Carolina 29211
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pfox@mcnair.net

ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina

September 15, 2009

BEFORE

THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Docket No. 2009-326-C

**IN RE:**

| | | |
|---|---|---|
| **State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering** | ) | **CERTIFICATE OF SERVICE** |

I, Betty Y. Wheeler, do hereby certify that I have this date served one (1) copy of South Carolina Telephone Coalition's First Set Of Interrogatories and Requests for Production of the South Carolina Cable Television Association, Compsouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated upon the following parties of record by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as follows

BENJAMIN P. MUSTIAN
WILLOUGHBY & HOEFER, P.A.
P O BOX 8416
Columbia, SC 29202

BONNIE D. SHEALY, ESQUIRE
ROBINSON, MCFADDEN &
MOORE, PC
P O BOX 944
COLUMBIA, SC 29202

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ROBINSON, MCFADDEN &
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ATLANTA, GA 30375

JOHN M.S. HOEFER
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STEVEN W. HAMM, ESQUIRE
RICHARDSON, PLOWDEN &
ROBINSON, PA
P O DRAWER 7788
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ZELL GILBERT, ESQUIRE
UNITED TELEPHONE COMPANY
OF THE CAROLINAS
1122 LADY STREET
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COLUMBIA, SC 29211

Betty Y. Wheeler

Betty Y. Wheeler
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Post Office Box 11390
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(803) 799-9800

September 15, 2009

Columbia, South Carolina