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ATTORNEYS

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August 23, 2006

RECEIVED

AUG 23 2006

PUBLIC SERVICE
COMMISSION

Via Hand Delivery

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: *In the Matter of: Petition of Ballard Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed interconnection Agreement with American Cellular f/k/a ACC Kentucky License LLC, Partnership Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996, Case No. 2006-00215*

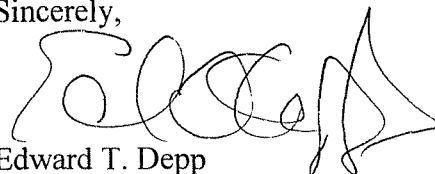
Dear Ms. O'Donnell:

I have enclosed for filing in the above-styled case the original and eleven (11) copies of Ballard Rural Telephone Cooperative Corporation, Inc.'s Interrogatories and Requests for Production of Documents to CMRS Carriers in the above-referenced matter. Please file-stamp one (1) copy, and return it to our delivery person.

Thank you, and if you have any questions, please contact me at (502) 540-2300.

Sincerely,

Edward T. Depp



ETD/lb

Enclosure

cc: All parties of record
John E. Selent, Esq. (w/o enclosures)
Holly C. Wallace, Esq. (w/o enclosures)

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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PUBLIC SERVICE
COMMISSION

In the Matter of:

Petition of Ballard Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular Corporation f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996)))))))))
						Case No. 2006-00215			

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO CMRS CARRIERS**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, and pursuant to the July 25, 2006 procedural order ("July 25 Order") entered by the Public Service Commission of the Commonwealth of Kentucky ("Commission") in this matter, hereby propounds the following interrogatories and requests for production of documents (collectively, the "Discovery Requests") to the CMRS carriers who are party to this matter. The Discovery Requests shall be answered in accordance with the Definitions and Instructions set forth below on or before September 7, 2006, with the interrogatories being answered under oath. The requested documents shall be produced at the offices of Dinsmore & Shohl LLP, Attn.: John E. Selent, Holly C. Wallace, and Edward T. Depp, 1400 PNC Plaza, 500 West Jefferson Street, Louisville, Kentucky 40202, unless otherwise agreed by the parties.

I. DEFINITIONS

A. The terms "you" and "your" shall refer to each respective CMRS carrier, individually, who is a party to this proceeding, as well as its present or former agents, attorneys, representatives and all other persons who have acted or purported to act on its behalf pursuant to

contract or otherwise in any of the matters covered by these Discovery Requests, whether or not it is contended that such entity or person had authority to act on behalf thereof.

B. "Communication" means any oral or written exchange of words, thoughts or ideas with another person(s), whether person to person, in a group, in a meeting, by telephone, letter, telefax, electronic mail, or otherwise, and including without limitation any printed, typed, handwritten or other readable document and any tape recording, correspondence, memorandum, report, contract, diary, logbook, minutes, note, study, survey and forecast.

C. "Document" or "documents" shall have their customary broad meanings and shall include, without limitation, all originals, copies and drafts of all written, typewritten, recorded, transcribed, printed, taped, photographic or graphic matter, however produced or reproduced, whether sent or received, or neither, including but not limited to, all books, pamphlets, articles, newspapers, press releases, magazines, booklets, circulars, handbooks, manuals, periodicals, letters, memoranda, files, envelopes, notices, instructions, reports, financial reports, records studies, transcripts, diaries (formal or informal), audited and unaudited financial statements, working papers, questionnaires, notes, notations, charts, lists, comparisons, telegrams, cables, telex messages, communications (including intra-corporate communications, and reports, notes, notations and memoranda of, or relating to, telephone conversations and conferences), minutes, transcriptions, correspondence, agreements, graphs, tabulations, analyses, evaluations, tests, projections, opinions or reports, statements, summaries, desk calendars, appointment books, telephone logs, telephone bills, surveys, indices, tapes, computer inputs or outputs, computer memory, computer discs, electronic mail, microfilm, magnetic tapes, photographs, installation guides and instructional material within your possession, custody or control. Different versions of the same documents.

including but not limited to, drafts or documents with handwritten notations or marks not found in the original or on other copies are different documents.

D. “Person” means any natural person as well as any firm, partnership, proprietorship, association, institution, joint venture, corporation, government entity, administrative agency, professional association and any other organization.

E. “Identify,” when used in reference to a natural person, means to provide the person’s name, last known home and business addresses, last known home and business telephone numbers, present employer, and job title.

F. “Identify,” when used in reference to a person that is a corporation, partnership, proprietorship, association, business, or other such group, means to provide the person’s full name, address, telephone number, form of organization, and a description of its business activities.

G. “Identify,” when used in reference to a document, means to provide a brief description of the document including its date, author, addressee, known recipients, form (that is, letter, invoice, blueprint, etc.), subject matter, length, and the present custodian of each copy of the document having notations unique to such copy.

H. “Identify,” when used in reference to an oral communication, means to state the date of the communication and the place or places where the communication occurred, to identify each person who took part in or heard the communication, to provide a description of the subject matter of the communication, and to identify each document that refers or relates to or evidences the communication.

I. “Date” refers to the exact day, month, and year, if known, or, if not known, the best approximation including, as appropriate to the situation, relationship to other events.

J. "Intermediary Carrier" or "Intermediary Carriers" shall have the same meaning as that ascribed to the term(s) by the CMRS Carriers in Issue No. 2 of the CMRS Providers' Issues Matrix, attached as Exhibit B to the CMRS Carriers' Consolidated Response to Arbitration Petitions.

K. "Rural Telephone Companies" shall be as defined in the Telecommunications Act of 1996.

II. INSTRUCTIONS

A. In answering these Discovery Requests, words used in the singular number shall include the plural number and words used in the plural number shall refer to the singular number as well. Gender is to be wholly disregarded, the neuter referring as well to the male and the female and the male and the female referring to each other as well as to the neuter.

B. The words "and" or "or" shall be construed conjunctively or disjunctively, as is necessary to make each Interrogatory inclusive rather than exclusive; and the singular of any word shall include the plural, and the plural shall include the singular, as is necessary to make each Interrogatory inclusive rather than exclusive.

C. Where identification of each fact relied upon by you with regard to a specified allegation or contention is requested, the response shall state separately with specificity each fact in your knowledge, whether obtained through documents, oral communications (whether or not reduced to writing), personal or professional experience or through any other means, which you believe supports the truth of such allegation.

D. If you cannot answer any Interrogatory fully, answer it to the extent possible and state the reason(s) for not answering more fully.

E. If, in answering these Discovery Requests you encounter any ambiguity in construing the Discovery Requests, or a definition or instruction relevant to the inquiry contained therein, set

forth the matter deemed "ambiguous" and set forth the construction chosen or used in answering the Discovery Requests.

F. In answering these Interrogatories, furnish such information as is available to you, not merely such information as is within your knowledge. This means that you are to furnish information that is known by, available to or in possession of your employees, representatives, servants or agents, including your attorney or any agent or investigator for you or your attorney (unless privileged).

G. If you claim privilege as grounds for objection to any Discovery Request, identify

1. The name and address of the speaker or author of the document;
2. The date of the communication or document;
3. The name and address of any person to whom the communication was made or the document was sent or to whom copies were sent or circulated at any time;
4. The form of the communication or document (i.e. letter, memorandum, invoice, contract, etc.);
5. The title and length of the document;
6. The names and addresses of any person currently in possession of the document or a copy thereof;
7. A detailed description of the communication or document; and
8. The nature of the privilege claimed.

H. For any document no longer in your custody or control, identify the document, state whether it is missing, lost, destroyed, transferred to others or otherwise disposed of, and identify any person who currently has custody or control of the document or who has knowledge of the contents of the document.

I. These Discovery Requests shall be deemed continuing in nature so as to require additional answers if further information is obtained between the time the answers are served and the time of any hearing before the Ohio Public Utility Commission.

J. For all documents produced in response to these Discovery Requests, identify the particular numbered Discovery Request to which they are responsive.

K. Each interrogatory and request for production of documents should be construed as being directed individually to each of the CMRS Carriers who are party to this proceeding. Notwithstanding the foregoing, to the extent that the answer or response of the individual CMRS Carriers is identical, the answer or response may be provided in the collective form. However, when the individual CMRS Carriers have different answer or responses to the Discovery Requests, each CMRS Carrier with a differing answer or response shall identify itself (examples: Cingular Answer; Verizon Wireless Response) and set forth its answer(s) or response(s) separately from the other CMRS Carriers.

III. INTERROGATORIES

1. Identify each person who participated in the consideration and preparation of your answers to these Discovery Requests and identify to which particular Discovery Request each person was involved in answering.

ANSWER:

2. Identify all persons you intend to call as witnesses at the October 16-18, 2006 evidentiary hearing in the above styled matter (the "Evidentiary Hearing").

ANSWER:

3. For each person identified in response to Interrogatory No.2 above, state the facts known and substance of his/her expected testimony at the Evidentiary Hearing.

ANSWER:

4. Identify all documents that each person identified in response to Interrogatory No.2 above, intends to use, reference, or rely upon during his/her testimony at the Evidentiary Hearing.

ANSWER:

5. Identify each person you will or may call as an expert or to offer any expert testimony at the Evidentiary Hearing in this matter.

ANSWER:

6. For each person identified in response to Interrogatory No.5 above, state all facts known and opinions held by that person with respect to this proceeding, identifying all written reports of the expert containing or referring to those facts or opinions.

ANSWER:

7. Identify all potential Intermediary Carriers with and through whom the CMRS Carriers have contemplated exchanging traffic with the petitioner in this matter.

ANSWER:

8. With respect to each Intermediary Carrier identified in response to Interrogatory No. 7, above, identify and describe in detail all existing arrangements pursuant to which the Intermediary

Carrier has agreed to transit traffic between the CMRS Carriers and the petitioner in this matter. Such detailed description shall include, but not be limited to, all physical and financial terms and conditions associated with the proposed transit of traffic through or across the Intermediary Carrier's network.

ANSWER:

9. State whether it is the CMRS Providers' position(s) that the exchange of traffic through an Intermediary Carrier should be required regardless of the volume of traffic exchanged between the parties. If this is not the position of the CMRS Providers, describe in detail the circumstances (including, but not limited to the appropriate traffic volume threshold and/or transit cost threshold) under which the exchange of traffic through an Intermediary Carrier should not be required of the parties.

ANSWER:

10. Identify all rates for transport and termination of traffic proposed by the CMRS Carriers. If the CMRS Carriers do not propose a rate for transport and termination of traffic, explain in detail the basis for that failure to propose such rates, and explain in detail the basis by which the CMRS Carriers would propose that the Commission resolve the existing dispute with respect to such rates.

ANSWER:

11. Identify the proposed default intraMTA and interMTA traffic factors that the CMRS Carriers propose be included in the interconnection agreement resulting from this arbitration, and

explain in detail the means by which the CMRS Carriers have determined those factors. If the CMRS Carriers do not propose default intraMTA and interMTA traffic factors, explain in detail the basis for that failure to propose such traffic factors.

ANSWER:

12. Explain in detail the CMRS Carriers' rationale for concluding that the traffic volume forecasts proposed by the petitioner in this matter "are unnecessary," (*see* CMRS Providers' Issues Matrix at Issue 24), and explain in detail how the CMRS Carriers propose to plan for adequate network capacity if such forecasts are not utilized.

ANSWER:

13. For each month during the period from May 1, 2004 through the present date, identify the CMRS Carriers' respective minutes of usage ("MOU") delivered to, and received from the petitioner in this matter.

ANSWER:

14. For each month from the present date through the end of 2006, identify the CMRS Carriers' respective, forecast MOU to be delivered to the petitioner in this matter.

ANSWER:

15. For each Intermediary Carrier identified in response to Interrogatory No. 7, above, identify all per minute transit and other charges (each identified separately) that such Intermediary

Carrier has contractually agreed or is otherwise anticipated to assess against each respective CMRS Carrier.

ANSWER:

16. For each Intermediary Carrier identified in response to Interrogatory No. 7, above, identify all per minute transit and other charges (each identified separately) that such Intermediary Carrier has contractually agreed or is otherwise anticipated to assess against petitioner in this matter.

ANSWER:

17. Identify all agreements, arrangements, rebates, or other formal or informal understandings between the CMRS Carriers and any potential Intermediary Carriers pursuant to which the CMRS Carriers would receive any amount or kind of financial or other incentive from the Intermediary Carrier as the volume of minutes transiting the Intermediary Carrier to or from the CMRS Carriers increases.

ANSWER:

18. State whether any of the CMRS Carriers have a direct or indirect ownership interest in any proposed Intermediary Carrier(s). If any CMRS Carrier answers in the affirmative, identify the CMRS Carrier, the proposed Intermediary Carrier, and the nature and extent of the ownership interest.

ANSWER:

19. Identify and explain in detail all financial, technical, operational, and other factors the CMRS Carriers believe support their position that they should be entitled to utilize an Intermediary Carrier to exchange traffic with the petitioner in this matter.

ANSWER:

20. For each respective CMRS Carrier, identify all States or Commonwealths in which the such CMRS Carrier has either (i) voluntarily agreed; or (ii) been ordered to exchange traffic with Rural Telephone Companies at rates other than TELRIC-based rates. For each such State or Commonwealth, identify the Rural Telephone Companies with whom such CMRS Carrier exchanges traffic at rates other than TELRIC-based rates, identify the rate at which traffic is exchanged with such Rural Telephone Company, and identify the manner in which the rate was derived.

ANSWER:

21. For each respective CMRS Carrier, identify all States or Commonwealths in which the such CMRS Carrier has either (i) voluntarily agreed; or (ii) been ordered to exchange traffic with Rural Telephone Companies at TELRIC-based rates. For each such State or Commonwealth, identify the Rural Telephone Companies with whom such CMRS Carrier exchanges traffic at TELRIC-based rates, identify the rate at which traffic is exchanged with such Rural Telephone Company, and identify both the date of and the consultant(s) that prepared the TELRIC-study from which such rate was derived.

ANSWER:

22. Identify all Intermediary Carriers with which the CMRS Carriers have existing, direct network connectivity in Kentucky.

ANSWER:

23. Describe in detail all rates and other charges that the CMRS Carriers propose to assess against the petitioner in this matter if the parties exchange traffic: (i) through direct connection of their respective networks; and (ii) through an Intermediary Carrier.

ANSWER:

24. With respect to all Intermediary Carriers identified in response to Interrogatory No. 7, describe in detail the financial (including, but not limited to applicable rates and charges) and operational (including, but not limited to provision of traffic billing data) terms and conditions that would be imposed by such Intermediary Carriers upon petitioner in this matter if petitioner was required to exchange traffic with the CMRS Carriers through such Intermediate Carriers.

ANSWER:

25. Identify the actual intraMTA and interMTA traffic factors that the CMRS Carriers propose be included in the interconnection agreement resulting from this arbitration, and explain in detail the means by which the CMRS Carriers have determined those factors. If the CMRS Carriers do not propose intraMTA and interMTA traffic factors, explain in detail the basis for that failure to propose such traffic factors.

ANSWER:

IV. REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in, referenced, referred to, reviewed, consulted, or relied upon in any way in responding to any of the Interrogatories or Requests for Admission propounded herein.

RESPONSE:

2. Produce all documents that you plan to introduce or use as exhibits at the Evidentiary Hearing.

RESPONSE:

3. Produce all documents that support the opinion of any expert who has been identified, and attach all documents such expert relied upon in forming his/her opinions and all documents that the expert reviewed, whether or not the documents were relied upon in forming his/her opinions.

RESPONSE:

4. Produce the *curriculum vitae* of each expert witness and fact witness you expect to testify on your behalf at the Evidentiary Hearing.

RESPONSE:

5. Produce all documents relied upon by each expert witness you expect to testify on your behalf at the Evidentiary Hearing.

RESPONSE:

6. Produce all documents that refer to, relate to, or evidence any evaluation, analyses, studies, or reports made by, tests performed by, or conclusions reached by any expert witness you expect to testify on your behalf at the Evidentiary Hearing.

RESPONSE:

7. Produce all photographs, drawings, videotapes, electronic presentations (for example, Power Point presentations), blueprints or other demonstrative documents in your possession or of which you are aware relating to the subject matter of the above styled case.

RESPONSE:

8. Produce all photographs, drawings, videotapes, electronic presentations (for example, Power Point presentations), blueprints or other demonstrative documents that you intend to use at the Evidentiary Hearing.

RESPONSE:

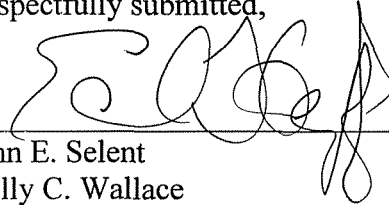
9. Produce all arbitration proceeding orders in your possession in which a state public utility commission has ordered that CMRS Carriers exchange traffic with Rural Telephone Companies at rates other than TELRIC-based rates.

RESPONSE:

10. Produce all documents that refer to, relate to, or otherwise reference the CMRS Carriers' agreements, understandings, and/or contractual relationships with the Intermediary Carriers identified in response to Interrogatory No. 7.

RESPONSE:

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John E. Selent', written over a horizontal line.

John E. Selent

Holly C. Wallace

Edward T. Depp

DINSMORE & SHOHL LLP

1400 PNC Plaza

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Louisville, Kentucky 40202

(502) 540-2300 (telephone)

(502) 585-2207 (fax)

**COUNSEL TO BALLARD RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first-class United States mail and electronic mail on this 23rd day of August, 2006, to the following individual(s):

Jeff Yost, Esq.
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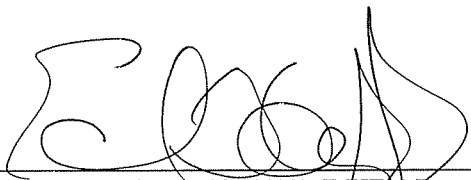
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**COUNSEL TO BALLARD RURAL
TELEPHONE COOPERATIVE
CORPORATION, INC.**