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September 22, 2006

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SEP 22 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

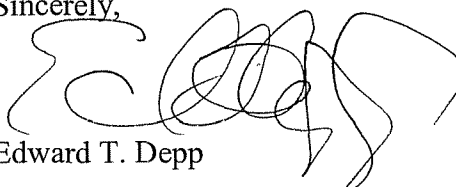
Re: Kentucky Public Service Commission Case Nos.
1) 2006-00215; 2) 2006-00217; 3) 2006-00218; 4) 2006-00220;
5) 2006-00252; 6) 2006-00255; 7) 2006-00288; 8) 2006-00292;
9) 2006-00294; 10) 2006-00296; 11) 2006-00298; 12) 2006-00300

Dear Ms. O'Donnell:

I have enclosed for filing in the above styled cases the original and eleven (11) copies of the Responses and Objections to CMRS Providers' Supplemental Information Requests. Please file-stamp one copy and return it to our delivery person.

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

Sincerely,



Edward T. Depp

ETD/lb

cc: John N. Hughes, Esq.
Mary Beth Naumann, Esq.
Holland N. McTyeire, Esq.
Bhogan M. Modi
Mark R. Overstreet, Esq.
Tom Sams
Philip R. Schenkenberg, Esq.
Jeff Yost, Esq.
Amy E. Dougherty, Esq.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matters 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
)	
)	
Petition of Brandenburg Telephone Company For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996)	
)	
)	Case No. 2006-00288
)	
)	
)	
Petition of Duo County Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as amended by the Telecommunications Act of 1996)	
)	
)	Case No. 2006-00217
)	
)	
)	
Petition of Foothills Rural Telephone Cooperative Corporation, Inc., for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996)	
)	
)	Case No. 2006-00292
)	
)	

Petition of Gearheart Communications Inc. d/b/a)	
Coalfields Telephone Company, for Arbitration of)	
Certain Terms and Conditions of Proposed)	
Interconnection Agreement with Cellco Partnership)	
d/b/a Verizon Wireless, GTE Wireless of the)	
Midwest Incorporated d/b/a Verizon Wireless, and)	Case No. 2006-00294
Kentucky RSA No. 1 Partnership d/v/a Verizon)	
Wireless, Pursuant to the Communications Act of)	
1934, as Amended by the Telecommunications)	
Act of 1996)	
)	
Petition of Logan Telephone Cooperative, Inc.)	
For Arbitration of Certain Terms and)	
Conditions of Proposed Interconnection)	
Agreement with American Cellular Corporation)	Case No. 2006-00218
f/k/a ACC Kentucky License LLC, Pursuant to)	
the Communications Act of 1934, as Amended)	
by the Telecommunications Act of 1996)	
)	
Petition of Mountain Rural Telephone Cooperative)	
Corporation, Inc., for Arbitration of Certain Terms)	
and Conditions of Proposed Interconnection)	
Agreement with Cellco Partnership d/b/a Verizon)	
Wireless, GTE Wireless of the Midwest)	Case No.2006-00296
Incorporated d/b/a Verizon Wireless, and Kentucky)	
RSA No. 1 Partnership d/b/a Verizon Wireless,)	
Pursuant to the Communications Act of 1934,)	
as Amended by the Telecommunications)	
Act of 1996)	
)	
Petition of North Central Telephone Cooperative)	
Corporation, 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)	Case No. 2006-00252
Communications Act of 1934, as Amended by)	
The Telecommunications Act of 1996)	

Petition of Peoples Rural Telephone)
Cooperative, Inc. for)
Arbitration of Certain Terms and)
Conditions of Proposed Interconnection)
Agreement with Cellco Partnership d/b/a Verizon)
Wireless, GTE Wireless of the Midwest) Case No. 2006-00298
Incorporated d/v/a Verizon Wireless, and)
Kentucky RSA No. 1 Partnership d/b/a Verizon)
Wireless)
Pursuant to the Communications Act of)
1934, as Amended by the Telecommunications)
Act of 1996)
)

Petition of South Central Rural Telephone)
Cooperative Corporation, Inc. for Arbitration)
Of Certain Terms and Conditions of Proposed)
Interconnection Agreement with Cellco)
Partnership d/b/a Verizon Wireless, GTE)
Wireless of the Midwest Incorporated d/b/a) Case No. 2006-00255
Verizon Wireless, and Kentucky RSA No. 1)
Partnership d/b/a Verizon Wireless,)
Pursuant to the communications Act of 1934,)
As Amended by the Telecommunications)
Act of 1996)
)

Petition of Thacker-Grigsby Telephone Company,)
Inc., for Arbitration of Certain Terms and)
Conditions of Proposed Interconnection Agreement)
with Cellco Partnership d/b/a Verizon Wireless,)
GTE Wireless of the Midwest Incorporated d/b/a)
Verizon Wireless, and Kentucky RSA No. 1) Case No. 2006-00300
Partnership d/b/a Verizon Wireless)
Pursuant to the Communications Act of 1934,)
as Amended by the Telecommunications)
Act of 1996)
)

Petition of West Kentucky 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. 2006-00220

RESPONSES AND OBJECTIONS TO CMRS PROVIDERS' SUPPLEMENTAL INFORMATION REQUESTS

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard"), Brandenburg Telephone Company, ("Brandenburg"), Duo County Telephone Cooperative Corporation, Inc. ("Duo County"), Foothills Rural Telephone Cooperative Corporation, Inc. ("Foothills"), Gearheart Communications Inc. ("Gearheart"), Logan Telephone Cooperative, Inc. ("Logan"), Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain"), North Central Telephone Cooperative Corporation ("North Central"), Peoples Rural Telephone Cooperative, Inc. ("Peoples"), South Central Rural Telephone Cooperative Corporation, Inc. ("South Central"), Thacker-Grigsby Telephone Company, Inc. ("Thacker-Grigsby"), and West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") (collectively, the "Petitioners"), hereby submit their responses and objections to the CMRS Providers' Supplemental Information Requests, and state as follows.

Supplemental Interrogatories and Requests for Production

- 2.1. Were the interconnection agreements between Mountain Rural Telephone Cooperative, Foothills Rural Telephone Cooperative and Appalachian Wireless filed with the Kentucky Public Service Commission? If so, give the date of filing(s)?

OBJECTIONS: Mountain and Foothills object that this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving their objections, they answer as follows.

MOUNTAIN ANSWER: The interconnection agreement between Mountain and Appalachian Wireless has not yet been filed with the Kentucky Public Service Commission.

FOOTHILLS ANSWER: The interconnection agreement between Foothills and Appalachian Wireless has not yet been filed with the Kentucky Public Service Commission.

- 2.2. Please, give the current total access line count for the following Petitioners:
- a. Duo County Telephone Cooperative (12,893)
 - b. Ballard Rural Telephone Cooperative (6,224)
 - c. Logan Telephone Cooperative (6,659)
 - d. West Kentucky Rural Telephone Cooperative (14,895)

- e. North Central Telephone Cooperative (5,766)
- f. Brandenburg Telephone Company (26,218)
- g. Gearheart Communications d/b/a Coalfields Telephone Company (6,496)
- h. Peoples Rural Telephone Cooperative (8,537)

OBJECTIONS: The entities identified in sub-items a-h, above, object to this interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, the entities identified in sub-items a-h, above, answer as follows.

GENERAL ANSWER: The present Kentucky access line counts for each of the above-identified entities is specified adjacent to the particular entity's name, above.

- 2.3. Provide copies of each Petitioner's two most recent annual reports filed with the Kentucky Public Service Commission.

OBJECTIONS: Petitioners object to this request because it is not reasonably calculated to lead to the discovery of admissible evidence. Petitioners further object to this request as being unduly burdensome because the requested information is publicly available at the Public Service Commission of the Commonwealth of Kentucky ("Commission") and on its website. Without waiving these objections, Petitioners state as follows.

GENERAL ANSWER: The requested annual reports are posted on the Commission's website.

- 2.4. Have South Central Rural Telephone Cooperative and Duo County Telephone Cooperative executed interconnection agreements with Blue Grass Cellular? If so, please produce copies. If such interconnection agreements were filed with the Kentucky Public Service Commission, please give the date(s) of filing.

OBJECTIONS: South Central and Duo County object to this interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence. Petitioners further object to this request as being unduly burdensome because the requested information is publicly available at the Public Service Commission of the Commonwealth of Kentucky and on its website. Without waiving their objections, South Central and Duo County state as follows.

SOUTH CENTRAL ANSWER: South Central's interconnection agreement with Bluegrass Cellular is posted on the Commission's website.

DUO COUNTY ANSWER: Duo County's interconnection agreement with Bluegrass Cellular is posted on the Commission's website.

- 2.5. Has South Central Rural Telephone Cooperative established direct interconnection trunks with Blue Grass Cellular?

SOUTH CENTRAL ANSWER: South Central objects to this interrogatory because it is not reasonably calculated to lead to the discover of admissible evidence. Without waiving its objection, South Central answers in the affirmative.

2.6. Has Duo County Telephone Cooperative established direct interconnection trunks with Blue Grass Cellular?

DUO COUNTY ANSWER: Duo County objects to this interrogatory because it is not reasonably calculated to lead to the discover of admissible evidence. Without waiving its objection, Duo County answers in the affirmative.

2.7. Has West Kentucky Rural Telephone Cooperative executed an interconnection agreement with either West Kentucky Networks, Inc. or Purchase Communications? If so, please provide a copy or copies. If interconnection agreements were executed, please provide the date(s) of filing with the Kentucky Public Service Commission.

WEST KENTUCKY ANSWER: West Kentucky objects to this interrogatory and request because it is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, West Kentucky answers in the negative.

2.8. Identify facts that you claim should be considered by the Commission in setting transport and termination rates in the absence of TELRIC studies.

OBJECTIONS: Petitioners object to this request because it seeks mental impressions of counsel and attorney work product. Petitioners further object to this request because it is premature in that the Petitioners have not yet determined which facts they will claim should be considered by the Commission in addressing the rate-related issues in these arbitrations. Without waiving these objections, Petitioners state as follows.

GENERAL ANSWER: Prefiled testimony will be filed and served in accordance with the existing procedural order in these matters.

2.9. Other than the CMRS Providers involved in these consolidated cases, identify any CMRS Provider that bills you for terminating intraMTA traffic originated on a Petitioner's network based on traffic factors as opposed to actual measurement of traffic.

OBJECTIONS: Petitioners object to this request because it is not reasonably calculated to lead to the discovery of admissible evidence. Petitioners further object to this request as unduly vague, ambiguous, and unintelligible because the term "CMRS Provider" is a defined term. Petitioners further object to this request as overbroad and unduly burdensome because it seeks billing practice information that is addressed in the various interconnection agreements that: (i) are publicly available on the Commission's website; or (ii) have been provided to the CMRS Providers.

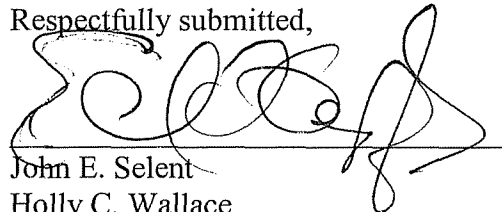
2.10. For each CMRS Provider, how much mobile-originated intraMTA traffic (in minutes of use) do you contend you terminated during May, June, July and August of 2006?

OBJECTIONS: Petitioners object to this request as being unduly burdensome because: (i) the CMRS Providers should have this data in their possession because it relates to traffic of their end-users; and (ii) the CMRS Providers are aware that – because neither party has the technical ability to determine the geographic location of the CMRS end-user at the time a call is placed – neither they nor the Petitioners can accurately measure the intraMTA minutes of use being originated or terminated by any of the parties. Petitioners further object to this request as being unduly burdensome insofar as it requests that Petitioners provide data in a form and/or format (that is, by calendar month) not ordinarily maintained by each Petitioner in the course of its business. Moreover, and without waiving their objections, Petitioners note that they are presently forced to rely on BellSouth for records related to CMRS Provider-originated traffic. With respect to a significant portion of that traffic (what BellSouth refers to as "non-meet point billing traffic"), BellSouth does not provide any EMR records at all, further complicating the ability of the Petitioners to measure traffic MOU's.

2.11. How much intraMTA traffic (in minutes of use) do you contend originated on your network and was delivered to each CMRS Provider for termination during May, June, July and August of 2006?

OBJECTIONS: Petitioners object to this request as being unduly burdensome because: (i) the CMRS Providers should have this data in their possession because it relates to traffic of their end-users; and (ii) the CMRS Providers are aware that – because neither party has the technical ability to determine the geographic location of the CMRS end-user at the time a call is placed – neither they nor the Petitioners can accurately measure the intraMTA minutes of use being originated or terminated by any of the parties. Petitioners further object to this request as being unduly burdensome insofar as it requests that Petitioners provide data in a form and/or format (that is, by calendar month) not ordinarily maintained by each Petitioner in the course of its business. With respect to a significant portion of that traffic (what BellSouth refers to as "non-meet point billing traffic"), BellSouth does not provide any EMR records at all, further complicating the ability of the Petitioners to measure traffic MOU's.

Respectfully submitted,



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COUNSEL TO PETITIONERS

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 22nd day of September, 2006, to the following individual(s):

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