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# BRIGGS AND MORGAN

PROFESSIONAL ASSOCIATION

WRITER'S DIRECT DIAL

(612) 977-8246

WRITER'S E-MAIL

pschenkenberg@briggs.com

October 10, 2006

## VIA FEDERAL EXPRESS

Beth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

**FILED**  
OCT 11 2006  
PUBLIC SERVICE  
COMMISSION

**Re: Case Nos. 2006-00215, 2006-00217, 2006-00218, 2006-00220, 2006-00252,  
2006-00255, 2006-00288, 2006-00292, 2006-00294, 2006-00296, 2006-00298  
and 2006-00300**

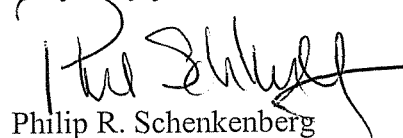
Dear Ms. O'Donnell:

Enclosed herewith for filing with the Commission please find 12 original and 10 copies of the following documents in the above-referenced matter:

- Verizon Wireless's Supplemental Responses to Petitioners' Interrogatories and Document Requests; and
- T-Mobile's Supplemental Responses to Petitioners' Interrogatories and Document Requests.

Please do not hesitate to contact me if you have any questions with regard to this matter.

Very truly yours,

  
Philip R. Schenkenberg

PRS/smo

Enclosures

cc: All Counsel of Record (via email and U.S. Mail)







**VERIZON WIRELESS' SUPPLEMENTAL RESPONSES TO PETITIONERS'  
INTERROGATORIES AND DOCUMENT REQUESTS**

Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership ("Verizon Wireless"), and provides these supplemental responses to the Interrogatories and Documents Requests filed by Petitioners:

**I. GENERAL OBJECTIONS**

1. Verizon Wireless objects to these Interrogatories and Document Requests to the extent that they seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence.

2. Verizon Wireless objects to each Interrogatory or Document Request that seeks information or documents (1) subject to the attorney-client privilege, or (2) subject to the attorney work-product privilege.

3. Verizon Wireless objects to these Interrogatories and Document Requests to the extent that they seek to impose obligations on Verizon Wireless that exceed the requirements of the Kentucky Rules of Civil Procedure or other applicable Kentucky law.

4. Verizon Wireless objects to each and every one of these Interrogatories and Document Requests to the extent that they seek to have Verizon Wireless create documents or information not in existence at the time of the discovery request.

Without waiving any of the above objections and subject to the further discovery request specific objections asserted herein, Verizon Wireless responds as follows:

**II. RESPONSES TO INTERROGATORIES**

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").

**SUPPLEMENTAL ANSWER:**

Testimony of John Clampitt and Don Wood has been prefiled in accordance with the Commission's scheduling order.

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.

**SUPPLEMENTAL ANSWER:**

See prefiled testimony of John Clampitt and Don Wood.

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.

**SUPPLEMENTAL ANSWER:**

The documents each witness will use, reference, or rely on are identified in the prefiled testimony. With regard to the testimony of John Clampitt, any such documents are referred to or identified in his testimony.

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.

**SUPPLEMENTAL ANSWER:**

Don Wood has filed testimony as an expert.

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.

**SUPPLEMENTAL ANSWER:**

Verizon Wireless objects to this request as overbroad. The facts on which Mr. Wood relies, and the opinions he will express in prefiled testimony are contained in his Direct and Rebuttal testimony.

**III. 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.

**SUPPLEMENTAL RESPONSE:**

Verizon Wireless objects to this request as overbroad, burdensome, and to the extent it seeks information protected by the attorney client or work product privileges. Subject to those objections and without waiver thereof, Verizon Wireless will make available for inspection at its offices the business records from which Verizon Wireless determined the minute-of-use information on Exhibit 1 hereto. The BellSouth transit reports and summaries referred to in John Clampitt's Direct Testimony are lengthy and contain confidential information. Verizon Wireless will make those available for inspection if requested by Petitioners. Bills sent by West Kentucky and Ballard (referred to in John Clampitt's Direct Testimony) are in the possession of those Petitioners.

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.

**SUPPLEMENTAL RESPONSE:**

Verizon Wireless objects to this request as overbroad and beyond what is allowed by the rules of discovery. Subject to that objection and without waiver thereof, documents on which Mr. Wood relies are discussed in his testimony.

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

**SUPPLEMENTAL RESPONSE:**

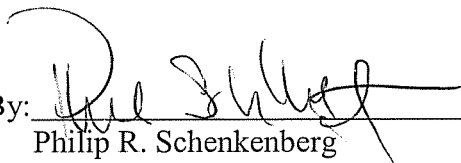
See responses to Interrogatory No. 4 and Request 5 above.

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:**

Verizon Wireless objects to this request as overbroad and burdensome. Subject to that objection, Verizon Wireless relies on documents attached to or identified in his Direct and Rebuttal Testimony.

Dated: October 10, 2006

By:   
Philip R. Schenkenberg  
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and

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ATTORNEYS FOR CELLCO PARTNERSHIP  
D/B/A VERIZON WIRELESS, GTE WIRELESS  
OF THE MIDWEST INCORPORATED, AND  
KENTUCKY RSA NO. 1 PARTNERSHIP  
(VERIZON WIRELESS")



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of **VERIZON WIRELESS'S SUPPLEMENTAL RESPONSES TO PETITIONERS' INTERROGATORIES AND DOCUMENT REQUESTS** was on this 10th day of October, 2006 served via electronic and United States mail, postage prepaid to the following:

John E. Selent  
DINSMORE & SHOHL, LLP  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202

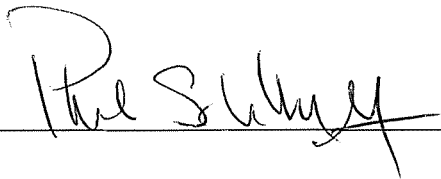
James Dean Liebman  
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Bhugin M. Modi  
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West Palm Beach, Florida 33461

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FRANCIS, KENDRICK AND FRANCIS  
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311 North Arnold Avenue, Suite 504  
P.O. Box 268  
Prestonburg, Kentucky 41653-0268

Thomas Sams  
NTCH, INC.  
1600 Ute Avenue, Suite 10  
Grand Junction, Colorado 81501

NTCH-WEST, INC.  
1970 N. Highland Avenue  
Suite E  
Jackson, Tennessee 38305



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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 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. 2006-00294

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 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. 2006-00296

Petition of Peoples 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. 2006-00298

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 Partnership d/b/a Verizon Wireless, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

Case No. 2006-00300

**T-MOBILE’S SUPPLEMENTAL RESPONSES TO PETITIONERS’  
INTERROGATORIES AND DOCUMENT REQUESTS**

Come now T-Mobile USA, Inc. Powertel/Memphis, Inc. and T-Mobile Central LLC (“T-Mobile”) and provides these supplemental responses to the Interrogatories and Documents Requests filed by Petitioners:

**I. GENERAL OBJECTIONS**

1. T-Mobile objects to these Interrogatories and Document Requests to the extent that they seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence.

2. T-Mobile objects to each Interrogatory or Document Request that seeks information or documents (1) subject to the attorney-client privilege, or (2) subject to the attorney work-product privilege.

3. T-Mobile objects to these Interrogatories and Document Requests to the extent that they seek to impose obligations on T-Mobile that exceed the requirements of the Kentucky Rules of Civil Procedure or other applicable Kentucky law.

4. T-Mobile objects to each and every one of these Interrogatories and Document Requests to the extent that they seek to have T-Mobile create documents or information not in existence at the time of the discovery request.

Without waiving any of the above objections and subject to the further discovery request specific objections asserted herein, T-Mobile responds as follows:

**II. RESPONSES TO 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.

**SUPPLEMENTAL ANSWER:**

T-Mobile objects to providing the home phone numbers of identified individuals. Subject to that objection, T-Mobile provides the following supplemental information:

David R. Conn  
National Director of State Regulatory and Policy  
12920 S.E. 38<sup>th</sup> St.  
Bellevue, WA 98006  
425-378-6151

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").

**SUPPLEMENTAL ANSWER:**

Testimony of David R. Conn and Don Wood has been prefiled in accordance with the Commission's scheduling order.

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.

**SUPPLEMENTAL ANSWER:**

See prefiled testimony of David R. Conn and Don Wood.

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.

**SUPPLEMENTAL ANSWER:**

The documents each witness will use, reference, or rely on are identified in the prefiled testimony. With regard to the testimony of David Conn, see also Exhibit A hereto.

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.

**SUPPLEMENTAL ANSWER:**

Don Wood has filed testimony as an expert.

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.

**SUPPLEMENTAL ANSWER:**

T-Mobile objects to this request as overbroad. The facts on which Mr. Wood relies, and the opinions he will express in prefiled testimony are contained in his Direct and Rebuttal testimony.

**III. 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.

**SUPPLEMENTAL RESPONSE:**

T-Mobile objects to this request as overbroad, burdensome, and to the extent it seeks information protected by the attorney client or work product privileges. Subject to those objections and without waiver thereof, T-Mobile will make available for inspection at its offices the business records from which T-Mobile determined the minute-of-use information on Exhibit 1 hereto. See also Exhibit A hereto

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.

**SUPPLEMENTAL RESPONSE:**

T-Mobile objects to this request as overbroad and beyond what is allowed by the rules of discovery. Subject to that objection and without waiver thereof, documents on which Mr. Wood relies are discussed in his testimony.

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

**SUPPLEMENTAL RESPONSE:**

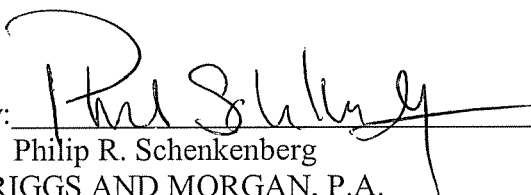
See responses to Interrogatory No. 4 and Request 5 above.

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:**

T-Mobile objects to this request as overbroad and burdensome. Subject to that objection, Mr. Wood relies on documents attached to or identified in his Direct and Rebuttal Testimony.

Dated: October 10, 2006

By:   
Philip R. Schenkenberg  
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and

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kendrick.riggs@skofirm.com

ATTORNEYS FOR T-MOBILE USA, INC.,  
POWERTEL/MEMPHIS, INC. AND T-MOBILE  
CENTRAL LLC (“T-MOBILE”)



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**From:** Kruizinga, Louis  
**Sent:** Tuesday, September 26, 2006 11:19 AM  
**To:** Gothard, Chris; Kumar, Manoj (Austin); Mathew, Elsamma  
**Cc:** Chung, Vu; Boyd, Richard; Green, John (Louisville); Tedesco, Greg  
**Subject:** RE: Kentucky - Info For Testimony

OK, I was able to find a business in Kevil, KY. to help us out. The customer's number was 270-462-2146 and he did have to dial 1-270-243-0000, (our Paducah test SIM) , to reach me . He could not do it any other way.

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**EXHIBIT A**

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of **T-MOBILE'S SUPPLEMENTAL RESPONSES TO PETITIONERS' INTERROGATORIES AND DOCUMENT REQUESTS** was on this 10th day of October, 2006 served via electronic and United States mail, postage prepaid to the following:

John E. Selent  
DINSMORE & SHOHL, LLP  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202

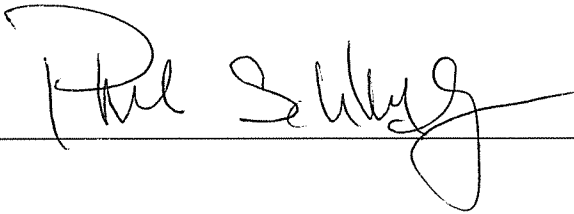
James Dean Liebman  
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NTCH, INC.  
1600 Ute Avenue, Suite 10  
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NTCH-WEST, INC.  
1970 N. Highland Avenue  
Suite E  
Jackson, Tennessee 38305



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1951744v1

1945768v1