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September 7, 2006

Ms. Beth A. O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602

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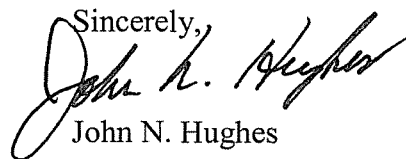
PUBLIC SERVICE  
COMMISSION

RE: Case Nos. 2006-00215; 2006-00217  
2006-00218; 2006-00220; 2006-00252

Dear Beth:

Please file the attached responses to the interrogatories submitted to Sprint Spectrum, L.P. and Sprintcom, Inc., d/b/a Sprint PCS in these cases. The responses are the same for each interrogatory in each case. Pursuant to discussions with the Staff, an original copy is being filed in each case and an additional five copies are being filed.

Thank you for your assistance, and please call me if you should have any questions regarding this matter.

Sincerely,  
  
John N. Hughes

Attachment

cc: William Atkinson  
Douglas C. Nelson  
Parties of Record



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 Communications Act of 1934, As Amended by the Telecommunications Act of 1996 ) Case No. 2006-00252

**RESPONSE OF SPRINT PCS TO THE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS SUBMITTED BY BALLARD, DUO COUNTY, LOGAN, WEST KENTUCKY, AND NORTH CENTRAL**

Sprint Spectrum L.P., on behalf of itself and SprintCom, Inc., d/b/a Sprint PCS (“Sprint PCS”); hereby files this response to the “Interrogatories and Requests for Production of Documents to CMRS Carriers” served on Sprint PCS by Ballard Rural Telephone Cooperative Corporation, Inc. (“Ballard”) which were adopted and served on Sprint PCS by Duo County Telephone Cooperative Corporation, Inc. (“Duo County”), Logan Telephone Cooperative, Inc. (“Logan”), West Kentucky Rural Telephone Cooperative Corporation, Inc. (“West Kentucky”), and North Central Telephone Cooperative Corporation (“North Central”) by letter dated August 23, 2006.

**GENERAL OBJECTIONS**

1. Sprint PCS objects to these Interrogatories and 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. Sprint PCS objects to each discovery request involving documents or information that are (1) subject to the attorney-client privilege, (2) attorney work-product, or (3) prepared in anticipation of litigation.

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

4. Sprint PCS objects to Interrogatories and Requests to the extent that they are vague, ambiguous, overly broad, imprecise, call for speculation or to the extent that they utilize undefined or insufficiently defined terms or phrases.

5. Sprint PCS objects to Interrogatories and Requests to the extent that they require the production of documents or information that is in the public domain, or on record with the Commission or the Federal Communications Commission, or which is already in petitioners' possession, custody or control.

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

Without waiving any of the above objections, Sprint PCS responds as follows:

### **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:** Shelley Jones, Contract Negotiator, Access Planning for Sprint PCS, 6330 Sprint Parkway, Overland Park, Kansas, 66251, Office Phone: 913-762-4463; and Mark Koval, Manager, Business Analysis, 6450 Sprint Parkway, Overland Park, Kansas, 66251, Office Phone: 913-315-9219.

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:** Sprint PCS objects to this Interrogatory on the basis that it seeks information that does not exist at the time of the request and on the grounds that it seeks information that is subject to the attorney-client privilege. The Commission’s Procedural Schedule provides for the filing of direct testimony on September 29, 2006 and gives the parties until then to identify witnesses. Subject to these objections, Sprint PCS responds as follows: While Sprint PCS intends to call at least one witness during the Evidentiary Hearing, witness(es) selection has not been made. Witness identity, the substance of witness(es)’ testimony, as well as documents used, referenced or relied upon in such witness(es)’ testimony will be provided when pre-filed testimony is submitted on September 29<sup>th</sup>.

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:** Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 2 above.

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:** Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 2 above.

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:** Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 2 above.

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:** Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 2 above. Sprint further objects to this Interrogatory on the basis that it is vague, ambiguous, and overly broad with respect to the use of the phrase “state all facts known and opinions held by that person with respect to this proceeding.”

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

**ANSWER:** Sprint PCS objects to this Interrogatory on the grounds that it is vague, ambiguous, and overly broad. The phrases “all potential Intermediary Carriers with and through whom” and “contemplated exchanging traffic” are vague and ambiguous. It is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Subject to these objections, Sprint responds as follows concerning

exchange of 251(b)(5) traffic with petitioners who have filed a petition against Sprint: Sprint PCS currently utilizes transiting service provided by BellSouth and contemplates the continued use of such service.

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:** Sprint PCS objects to this Interrogatory on the grounds that the information petitioners seek is in the public domain and on record with the Commission and that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Subject to these objections, Sprint PCS responds as follows: In addition to the settlement agreement to which the petitioners are parties, Sprint PCS' existing arrangements with BellSouth are governed by its interconnection agreement with BellSouth in Kentucky. The agreement is available on the Kentucky Public Service Commission website at [http://psc.ky.gov/agencies/psc/reports/intercon\\_1.html](http://psc.ky.gov/agencies/psc/reports/intercon_1.html) and on the BellSouth website at [http://cpr.bellsouth.com/clec/docs/all\\_states/8006a018.pdf](http://cpr.bellsouth.com/clec/docs/all_states/8006a018.pdf).

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:** Sprint PCS objects to this Interrogatory on the grounds that it is vague and ambiguous with respect to the scope and intent of the phrase “exchange of traffic through an Intermediary Carrier should be required regardless of the volume of traffic exchanged” and that it is overbroad in that it seeks from Sprint information with respect to other CMRS Carriers. Subject to these objections, Sprint PCS responds as follows: The federal Telecommunications Act requires the RLEC petitioners to interconnect either directly or indirectly with requesting carriers (Section 251(a)). Sprint PCS has the option to interconnect either directly or indirectly without regard to “the volume of traffic exchanged.”

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 that 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:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it requests information from Sprint PCS about other CMRS Carriers. Subject to this objection, Sprint PCS responds as follows: The FCC proxy rates for transport and termination of traffic set forth at 47 C.F.R. § 51.715 shall apply unless and until a TELRIC-based rate is set using the TELRIC studies that the petitioners have been



ordered by the Commission to submit. Alternatively, the Commission has the option of applying a bill and keep compensation arrangement if a TELRIC-based rate is not established.

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:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it seeks information from Sprint PCS on other CMRS Carriers and that it seeks information to be addressed in pre-filed testimony in advance of the filing deadline for testimony ordered in the Procedural Schedule. Subject to and without waiving its objections, Sprint PCS responds as follows: Sprint PCS anticipates providing testimony regarding the applicability, if any, of intraMTA factors with respect to Sprint PCS, and appropriate interMTA factors with respect to Sprint, in prefiled testimony on September 29<sup>th</sup>.

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:** Sprint PCS objects to the Interrogatory on the grounds that it seeks information from Sprint PCS regarding other CMRS Carriers. Subject to this objection, Sprint PCS responds as follows: Currently Sprint exchanges traffic with petitioner indirectly through a third-party tandem. The third party tandem provider and the petitioner are responsible for maintaining adequate network capacity between their networks. Sprint PCS is not involved with this process. If, or when, the petitioner and Sprint PCS exchange traffic using a direct connection, Sprint PCS will order the capacity required based on the directionality of the trunk being used. It is a normal Sprint PCS network function to monitor its standard grades of service on all trunks. Sprint PCS would request augmentation when capacity reached the trigger threshold established for its standard grades of service for its outbound traffic. Petitioner, of course, would be responsible, in a two-way trunk arrangement, to provide notice to Sprint PCS if its outbound traffic traversing such direct connection had reached an augmentation trigger threshold.

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:** Sprint PCS objects to this Interrogatory on the basis that it is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence; that it is vague and ambiguous with respect to the phrase "minutes of use"; that it seeks information from Sprint PCS on other CMRS Carriers; and

that it seeks information that is already in petitioners' possession, custody or control. Sprint PCS further objects to this Interrogatory to the extent it assumes or implies that Sprint PCS has any responsibility to identify and measure Sprint PCS originated traffic terminated to a petitioner, much less retain records regarding such traffic, and affirmatively states to the contrary that it is each petitioner's responsibility to make arrangements to identify and measure the traffic originated by Sprint PCS that terminates on the petitioner's network. *See, In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, 11 FCC Rcd 15499 para. 1045 (rel. August 8, 1996). Subject to and without waiving these objections, Sprint PCS responds as follows: Absent an interconnection agreement, Sprint PCS does not in the ordinary course of business measure, record, retrieve or retain data on Sprint PCS-originated monthly traffic that terminates to a petitioner's network, or on the monthly traffic received from a petitioner's network. Sprint PCS understands that BellSouth has been providing petitioners with 110101 records that identify traffic that Sprint PCS originates for delivery to each petitioner via BellSouth in Kentucky. Under the interim settlement agreement, which is operational through the end of the year, Sprint PCS is not paid for termination, thus there is no purpose for Sprint PCS to have recorded and retained records of traffic originating with petitioners.

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:** Sprint PCS objects to this Interrogatory on the basis that it is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery

of admissible evidence; that it is vague and ambiguous with respect to the phrase “minutes of use”; that it seeks information from Sprint PCS on other CMRS Carriers; and that it seeks information that is already in petitioners’ possession, custody or control. Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS does not have forecasts for traffic it originates to petitioners.

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:** Sprint PCS responds as follows: Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 8 above.

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:** Sprint PCS objects to this Interrogatory on the basis that the information requested is already, or should already be, in petitioners’ possession, custody or control, and that it appears to seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Sprint PCS further objects on the basis that it is overly broad and calls for speculation with respect to the phrase “otherwise anticipated to assess.” Subject to such objections

and without waiving them, Sprint PCS responds as follows: Sprint PCS is not in possession of any information regarding the charges that BellSouth and the petitioners should negotiate and, if necessary, arbitrate between themselves to establish such arrangements.

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:** Sprint PCS objects to this Interrogatory on the grounds that it is vague and ambiguous with respect to the phrase “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.” Sprint further objects on the basis that the information petitioners seek is in the public domain and on record with the Commission and that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 8 above.

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:** Sprint PCS objects to this Interrogatory on the basis that it is vague and ambiguous with respect to the phrase “proposed Intermediary Carrier(s)” and that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS has no direct or indirect ownership interest in any Intermediary Carrier(s) in Kentucky.

19. Identify and explain in detail all financial, technical, operational and other factors that 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:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers and that it is vague and ambiguous with respect to the phrase “should be entitled to.” Subject to these objections and without waiving them, Sprint PCS responds as follows: The federal Telecommunications Act requires petitioners to interconnect either directly or indirectly with requesting carriers (Section 251(a)).

20. For each respective CMRS Carrier, identify all States or Commonwealths in which the such [sic] 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:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Sprint PCS also objects on the basis that it is vague and ambiguous with respect to the phrase “been ordered” as even negotiated interconnection agreements that are not taken to arbitration are subject to commission review and are often approved by commission order. Sprint PCS objects on the basis that it is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Sprint PCS further objects that it would be burdensome and oppressive to provide a comprehensive list of voluntary rates in all States or Commonwealths. Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS has voluntarily agreed to negotiated rates for the exchange of traffic with Rural Telephone Companies without a determination being made whether such rates were or were not TELRIC-based. Sprint PCS has not been ordered in an arbitration by any state commission to exchange traffic with Rural Telephone Companies at rates other than TELRIC-based rates.

21. For each respective CMRS Carrier, identify all States or Commonwealths in which the such [sic] 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:** Sprint PCS incorporates by reference its response to Interrogatory 20 above and responds as follows: The Tennessee Regulatory Authority has ordered that traffic be exchanged with Rural Telephone Companies at TELRIC and the rate phase of that proceeding has not yet commenced. The list of Rural Telephone Companies involved in the proceeding are available in Tennessee Regulatory Authority consolidated docket 03-00585.

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

**ANSWER:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers and that it seeks information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections and without waiving them, Sprint PCS responds as follows: The Intermediary Carrier with whom Sprint PCS has existing, direct network connectivity in Kentucky and through which it exchanges traffic with petitioners is BellSouth.

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:** Sprint PCS objects to this Interrogatory on the grounds that it is overbroad in that it seeks from Sprint PCS information with respect to other CMRS Carriers. Subject to this objection and without waiving it, Sprint PCS responds as follows: If Sprint PCS exchanges traffic with petitioners through an Intermediary Carrier, Sprint PCS will assess transport and termination charges on petitioners' originated intraMTA traffic terminated by Sprint PCS based on petitioners' own TELRIC-based rates. If Sprint PCS exchanges traffic with petitioners through direct interconnection, Sprint PCS will a) assess transport and termination charges on petitioners' originated intraMTA traffic terminated by Sprint PCS based on petitioners' own TELRIC-based rates and b) expect petitioners to pay a proportionate share of the cost of direct interconnection facilities, by billing Sprint PCS only for Sprint's proportionate share of the cost of interconnection facilities based on the balance of traffic each party originates.

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:** Sprint PCS objects to this Interrogatory on the basis that the information requested is already, or should already be, in petitioners' possession, custody or control, and that it appears to seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Sprint further objects on the basis that the Interrogatory is overly broad and calls for speculation. Subject to such objections and without waiving them, Sprint PCS responds as follows: Sprint PCS is not in possession of any information regarding the financial and operational terms and conditions that BellSouth and the petitioners should negotiate and, if necessary, arbitrate between themselves to establish such arrangements.

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:** Sprint PCS refers to and incorporates by reference its Answer to Interrogatory 11 above.

## **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.

**ANSWER:** Sprint PCS objects to this request for production as it relates to “Requests for Admission” because the discovery served on Sprint PCS did not include any such requests. Sprint also objects on the basis that petitioners seek the production of documents or information that is in the public domain, or on record with the Commission. Subject to these objections and without waiving them, Sprint PCS responds as follows: The only responsive documents are THE SETTLEMENT AGREEMENTS TO WHICH PETITIONERS ARE PARTIES, interconnection agreements, FCC ORDERS, and sections of the Telecommunications Act of 1996 which are available publicly.

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

**ANSWER:** Sprint PCS objects to this request for production on the basis that it seeks documents that have not been identified at the time of the request and on the grounds that it seeks information that is subject to the attorney-client privilege. Subject to these objections, Sprint PCS responds as follows: While Sprint PCS anticipates that it will introduce documents for use at the Evidentiary Hearing and in support of testimony, no such documents have been identified at this time. All responsive documents will be produced at the time pre-filed testimony is submitted or by supplemental response to this request for production of documents. See also Answer to Interrogatory 2 above.

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.

**ANSWER:** Sprint PCS objects to this request for production on the basis that it seeks documents that have not been identified at the time of the request and on the grounds that it seeks information that is subject to the attorney-client privilege. The Commission's Procedural Schedule provides for the filing of direct testimony on September 29, 2006 and gives the parties until then to identify witnesses. Subject to these objections, Sprint PCS responds as follows: While Sprint PCS intends to call at least one witness during the Evidentiary Hearing, witness(es) selection has not been made. Documents used, referenced or relied upon in such witness(es)' testimony will be provided when pre-filed testimony is submitted on September 29<sup>th</sup> or by supplemental response to this request for production. See also Answer to Interrogatory 2 above.

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

**ANSWER:** Sprint PCS refers to and incorporates by reference Answer to Request for Production 3 above.

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

**ANSWER:** Sprint PCS refers to and incorporates by reference Answer to Request for Production 3 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.

**ANSWER:** Sprint PCS refers to and incorporates by reference Answer to Request for Production 3 above.

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.

**ANSWER:** Sprint PCS refers to and incorporates by reference Answer to Request for Production 2 above. Sprint PCS further objects on the basis that the request for production is overbroad and burdensome.

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.

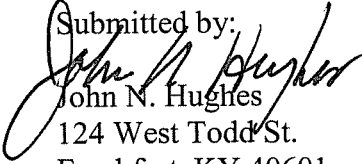
**ANSWER:** Sprint PCS refers to and incorporates by reference Answer to Request for Production 2 above.

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.

**ANSWER:** Sprint PCS objects to this request for production on the basis that it is overbroad in seeking documents relating to CMRS Carriers other than Sprint PCS. Sprint PCS also objects on the basis that it is vague and ambiguous with respect to the phrase “has ordered that CMRS Carriers exchange traffic.” Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS has not been ordered in an arbitration by any state commission to exchange traffic with Rural Telephone Companies at rates other than TELRIC-based rates.

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.

**ANSWER:** Sprint PCS refers to and incorporates by reference its Answers to Interrogatories 7 and 8 above. Subject to these objections and without waiving them, Sprint PCS responds as follows: Sprint PCS’ existing arrangements with BellSouth are governed by its interconnection agreement with BellSouth in Kentucky. The agreement is available on the Kentucky Public Service Commission website at [http://psc.ky.gov/agencies/psc/reports/intercon\\_1.html](http://psc.ky.gov/agencies/psc/reports/intercon_1.html) and on the BellSouth website at [http://cpr.bellsouth.com/clec/docs/all\\_states/8006a018.pdf](http://cpr.bellsouth.com/clec/docs/all_states/8006a018.pdf).

Submitted by:  
  
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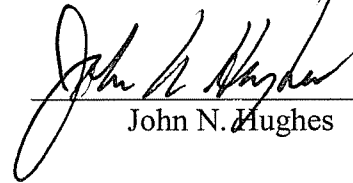
And

William R. Atkinson  
Douglas C. Nelson  
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Suite 2200  
Atlanta, GA 30303

Attorney for Sprint Spectrum, L.P.  
and Sprintcom, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of this Notice was served on the parties listed below by first class mail the 7<sup>th</sup> day of September, 2006.

  
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