

# BRIGGS AND MORGAN

PROFESSIONAL ASSOCIATION

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September 22, 2006

## VIA FEDERAL EXPRESS

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

RECEIVED

SEP 25 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' Response to Petitioners' Supplemental Interrogatories and Requests for Production of Documents; and
- T-Mobile's Response to Petitioner's Supplemental Interrogatories and Requests for Production of Documents.

Please note that Exhibit A to Verizon Wireless' Response document will be provided under separate cover.

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)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

ORIGINAL

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, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00215

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PUBLIC SERVICE COMMISSION

Case No. 2006-00217

Petition of Duo County Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With Celco 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 )

Petition of Logan Telephone Cooperative Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement With American Cellular f/k/a ACC Kentucky License LLC, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00218

Petition of West Kentucky 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, Pursuant to the Communications Act of 1934, as Amended by the Telecommunications Act of 1996 )

Case No. 2006-00220



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 RESPONSE TO  
PETITIONERS' SUPPLEMENTAL INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Come now T-Mobile USA, Inc. Powertel/Memphis, Inc. and T-Mobile Central LLC ("T-Mobile") and respond to the Interrogatories and Documents Requests filed by each Petitioner as follows:

**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:

**INTERROGATORY NO. 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 TO INTERROGATORY NO. 1:**

Greg Tedesco  
T-Mobile USA, Inc.  
Director, Intercarrier Relations  
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925-521-5583 (Bus phone)

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David Szarzynski

Philip R. Schenkenberg  
 Briggs and Morgan, P.A.  
 Attorney  
 2200 IDS Center  
 Minneapolis, Minnesota 55402  
 612-977-8246 (Bus.)

**INTERROGATORY NO. 2:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service provider in the local exchange area of the Company; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 2:**

T-Mobile objects to this request as vague as to the phrase “within the network(s).” To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that T-Mobile utilizes to exchange Section 251(b)(5) traffic with Petitioners, T-Mobile 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. Subject to those objections and without waiver thereof, T-Mobile has direct connections established with Petitioners Brandenburg Telephone Company and South Central Rural Telephone Cooperative Corporation, Inc. as follows:

<i>Carrier</i>	<i>Exchange</i>	<i>LATA</i>	<i>CLLI</i>	<i>DEST</i>	<i>ROUTE</i>	<i>Address</i>
Brandenburg Tel Co	Radcliff	462	RDCLKYXAD	5-1-96	BRANBGI	316 Lincoln Trl, Radcliff, KY 40160
South Central Rural Tel Coop	Glasgow	462	GLSGKYXR02	5-3-102	GLASGWI	584 S Green St, Glasgow, KY 42141

**INTERROGATORY NO. 3:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the Commonwealth of Kentucky; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which the CMRS Carriers have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 3:**

To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that T-Mobile utilizes to exchange Section 251(b)(5) traffic with Petitioners, T-Mobile 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. Subject to that objection and without waiver thereof, T-Mobile has the following physical connections with ILECs in Kentucky:

<i>Carrier</i>	<i>Exchange</i>	<i>LATA</i>	<i>CLLI</i>	<i>DEST</i>	<i>ROUTE</i>	<i>Address</i>
Alltel - Kentucky	Elizabethtown	462	EZTWKYXA05T	234-95-20	ELZAT3I	111 S Main st, Elizabethtown, KY 42701
Alltel - Kentucky	Lexington Main	466	LXTNKYXA01T	234-136-18	LXT01TI	250 W Main St, Lexington, KY 40507
Bellsouth	Louisville	462	LSVLKYAP2GT	252-113-16	LOUVLEO	526 Armory Pl, Louisville, KY 40202
Bellsouth	Bowling Green	464	BWLGKYMA01T	252-116-1	BOWLGRI	1150 State St, Bowling Green, KY 42101
Bellsouth	Madisonville	464	MDVIKYMA02T	252-116-2	MDSNKYO	305 S Main St, Madisonville, KY 42431
Bellsouth	Owensboro	464	OWBOKYMA1GT	252-116-4	OWBRKYO	720 Frederica St, Owensboro, KY 42301
Bellsouth	Danville	466	DAVLKYMA01T	252-119-1	DANVLEI	216 S Fourth St, Danville, KY 40422
Bellsouth	Winchester	466	WNCHKYMA02T	252-119-3	WINCHRI	222 Lexington Rd, Ford, KY 40391
Brandenburg Tel Co	Radcliff	462	RDCLKYXAD	5-1-96	BRANBGI	316 Lincoln Trl, Radcliff, KY 40160
South Central Rural Tel Coop	Glasgow	462	GLSGKYXR02	5-3-102	GLASGWI	584 S Green St, Glasgow, KY 42141

**INTERROGATORY NO. 4:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the MTA('s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 4:**

To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that T-Mobile utilizes to exchange Section 251(b)(5) traffic with Petitioners, T-Mobile 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. Subject to those objections and without waiver thereof, T-Mobile has identified the physical connections it has with ILECs in Kentucky in response to Interrogatory No. 3.



**INTERROGATORY NO. 5:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the LATA(s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 5:**

T-Mobile objects to this request to the extent it seeks information regarding connections T-Mobile may have with entities other than ILECs. T-Mobile further objects to this request to the extent it seeks information related to physical connections T-Mobile may have outside the state of Kentucky. Such information is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections and without waiver thereof, T-Mobile has identified the physical connections it has in Kentucky in response to Interrogatory No. 3.

**INTERROGATORY NO. 6:**

With respect to each MTA within which you provide service, identify and describe the extent to which CMRS service coverage is made available within the Company's local exchange service area(s).

**ANSWER TO INTERROGATORY NO. 6:**

T-Mobile 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. T-Mobile objects to this request to the extent it asks T-Mobile to create documents not in existence at the time the request was made. Subject to those objections and without waiver thereof, T-Mobile's coverage on its CMRS network can generally be seen at T-Mobile's Personal Coverage Check at [www.t-mobile.com](http://www.t-mobile.com). Please exclude roaming coverage indicated by the Personal Coverage Check tool.

**INTERROGATORY NO. 7:**

Identify the location of every antenna by which you provide CMRS service in the MTA(s) within which the Company is located.

**ANSWER TO INTERROGATORY NO. 7:**

T-Mobile objects to this request as vague with regard to the term "antennae," and because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-Mobile further objects to this request as overbroad and as unduly burdensome, and to the extent it would require T-Mobile to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, T-Mobile states that the Personal Coverage Check tool referred to in response to Interrogatory No. 6 shows voice coverage generated by each wireless antennae within the T-Mobile network. Please exclude roaming coverage indicated by the Personal Coverage Check tool.

**INTERROGATORY NO. 8:**

Identify the location of every antenna by which you provide CMRS service in each MTA in the Commonwealth of Kentucky. For each such location identified, identify the corresponding MTA in which such antenna is located.

**ANSWER TO INTERROGATORY NO. 8:**

T-Mobile objects to this request as vague with regard to the term “antennae,” and because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-Mobile further objects to this request as overbroad and as unduly burdensome, and to the extent it would require T-Mobile to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, T-Mobile states that the Personal Coverage Check tool referred to in response to Interrogatory No. 6 shows voice coverage generated by each wireless radio within the T-Mobile network. Please exclude roaming coverage indicated by the Personal Coverage Check tool.

**INTERROGATORY NO. 9:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with BellSouth or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER TO INTERROGATORY NO. 9:**

T-Mobile objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, T-Mobile states that it has been delivering transit traffic to BellSouth during the course of these negotiations, i.e., since at least January 1, 2006. All transit traffic delivered by T-Mobile to BellSouth since that time was appropriate under the parties' interconnection agreement and has been allowed.

**INTERROGATORY NO. 10:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with Windstream or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER TO INTERROGATORY NO. 10:**

T-Mobile objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, T-Mobile states that it has been delivering transit traffic to Windstream during the course of these negotiations, i.e., since at least January 1, 2006. All transit traffic delivered by T-Mobile to Windstream since that time was appropriate under the parties' interconnection agreement and has been allowed.

**INTERROGATORY NO. 11:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with any third-party (other than those identified in the preceding two interrogatories) ("transit service provider"), identify the transit service provider through which this delivery was sought to be accomplished, and state whether the transit service provider permitted such attempted transit traffic delivery to the Company.

**ANSWER TO INTERROGATORY NO. 11:**

T-Mobile objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, T-Mobile has not delivered transit traffic to any Petitioner through any companies other than BellSouth or Windstream and its predecessors.

**INTERROGATORY NO. 12:**

Identify all agreements by which you first sought to deliver traffic to the Company by means of the transit arrangements described in the preceding three interrogatories. If no such agreements exist, so state your answer. If such traffic delivery was sought to be accomplished pursuant to an unwritten agreement, describe the terms of such agreement, identify the date (or approximate date, if no exact date is available) of such agreement, and identify all persons involved in negotiating such agreement for you and the third-party.

**ANSWER TO INTERROGATORY NO. 12:**

T-Mobile objects to this request as overbroad and seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, T-Mobile refers Petitioners to the interconnection agreements identified in T-Mobile's response to Petitioners' First Discovery Requests.

**INTERROGATORY NO. 13:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, indicate (for each transit service provider) the percentage of your traffic transited to the Company that is: (i) Type I interconnection traffic; and (ii) Type II interconnection traffic.

**ANSWER TO INTERROGATORY NO. 13:**

T-Mobile objects to this request as vague with regard to the term "Type I interconnection traffic." Subject to that objection and without waiver thereof, T-Mobile states that it considers all traffic it delivers to BellSouth or Windstream to be delivered to a Petitioner for termination to be Type 2 interconnection traffic. Traffic delivered to a tandem switch is generally referred to as Type 2 interconnection traffic. T-Mobile is not aware of how the traffic would be categorized as between Bellsouth/Windstream and Petitioner.

**INTERROGATORY NO. 14:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, identify (for each transit service provider) the scope of geographic areas from which your end-users originate such traffic.

**ANSWER TO INTERROGATORY NO. 14:**

T-Mobile has one mobile switching center ("MSC") in the state of Kentucky, and that MSC serves all of the company's cell sites in Kentucky and some cell sites that are within Illinois or Indiana but in the Louisville MTA. It is possible that there may be some small amount of traffic delivered to this MSC from certain other T-Mobile switches that is transited through a BellSouth or Windstream tandem switch to be terminated by a RLEC.

**INTERROGATORY NO. 15:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please indicate (for each transit service provider): (i) what call detail records you create; (ii) what call detail records you create and provide to the transit service provider; and (iii) what call detail records you create and provide to the Company.

**ANSWER TO INTERROGATORY NO. 15:**

T-Mobile objects to this request as overbroad and as calling for information that is neither relevant nor reasonably calculated to lead to the discovery or admissible evidence. T-Mobile further objects to this request to the extent that it would require T-Mobile to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, T-Mobile states that does not create or provide any call detail records for any transit provider or for any Petitioner. As way of clarification, T-Mobile does create standard call detail records for its own internal customer billing purposes, but such records are not created for or provided to the transit providers.

With regard to (ii) and (iii), T-Mobile states that it does not provide any call detail records to any transit provider or to any Petitioner.

**INTERROGATORY NO. 16:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please describe (for each transit service provider) the specific interconnection trunking arrangement that you have in place with the transit service provider for the delivery, transit, and receipt of traffic to and from the Company. For purposes of this interrogatory, the phrase "specific interconnection trunking arrangement" should be construed to include, but not be limited to, information regarding whether such trunks are dedicated solely for the delivery and receipt of mobile CMRS traffic.

**ANSWER TO INTERROGATORY NO. 16:**

T-Mobile's tandem connections in Kentucky are identified in response to Interrogatory No. 3. The trunks between T-Mobile and each tandem provider contain only CMRS traffic, i.e., traffic that is originated by, or terminated to, a CMRS customer.

**INTERROGATORY NO. 17:**

Identify and describe all call detail record you provide to (i) any transit service provider identified in the preceding interrogatories, or (ii) the Company, and state whether such records can be used to determine the location of the cellular site serving your end-user customer(s) at the beginning of each call placed or received by your end-user customer.

**ANSWER TO INTERROGATORY NO. 17:**

T-Mobile objects to this request as overbroad and as calling for information that is neither relevant nor reasonably calculated to lead to the discovery or admissible evidence. T-Mobile further objects to this request to the extent that it would require T-Mobile to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, please see response to Interrogatory No. 15.

**RESPONSES TO REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 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 TO REQUEST FOR PRODUCTION NO. 1:**

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. T-Mobile further objects to the extent it calls for the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 2:**

Provide representative call detail records for all call detail records identified in answer to Interrogatories 15 and 17.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

T-Mobile objects to this request as overbroad and to the extent it calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-Mobile further objects to producing confidential information of customers or other carriers.

**REQUEST FOR PRODUCTION NO. 3:**

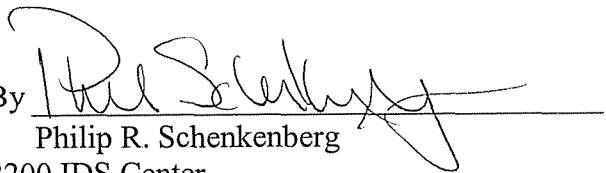
Provide all documentation (including, but not limited to, source documentation) used to determine the percentages of Type I and Type II interconnection traffic you transit to the Company.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

There are no documents responsive to this request.

Dated: September 22, 2006

**BRIGGS AND MORGAN, P.A.**

By 

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ATTORNEYS FOR T-MOBILE USA, INC.,  
POWERTEL/MEMPHIS, INC. AND T-  
MOBILE CENTRAL LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of **T-MOBILE'S RESPONSE TO PETITIONERS' SUPPLEMENTAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS** was on this 22<sup>nd</sup> day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

John E. Selent  
DINSMORE & SHOHL, LLP  
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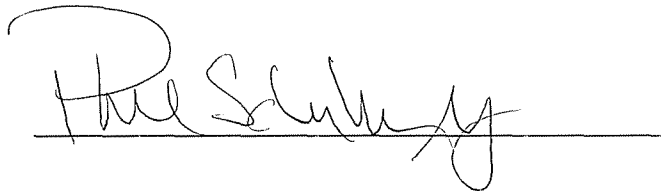
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NTCH-WEST, INC.  
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Suite E  
Jackson, Tennessee 38305



Howard Selent







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

**VERIZON WIRELESS' RESPONSE TO  
PETITIONERS' SUPPLEMENTAL INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Come now Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership ("Verizon Wireless") and respond to the Interrogatories and Documents Requests filed by each Petitioner as follows:

**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:

**INTERROGATORY NO. 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 TO INTERROGATORY NO. 1:**

John Clampitt  
Title: Member Technical Staff – Contract Negotiator  
Business Address: 2785 Mitchell Drive, Walnut Creek, CA 94598  
Business Telephone: 925/279-6266

Marc Sterling  
Title: Member Technical Staff –Contract Negotiator  
Business Address: One Verizon Place, Alpharetta, GA 30004  
Business Telephone: 678/339-4276

Amy Hindman  
Title: Member Technical Staff –Network Interconnection  
Business Address: One Verizon Place, Alpharetta, GA 30004  
Business Telephone: 678/339-4365

John Grimes  
Sr. Engineer-Transport (Network)  
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Stephanie Lawson-Muhammad  
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Sharon Brown  
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Elaine Critides  
Title: Senior Attorney  
Business Address: 1300 I Street NW, Suite 400, Washington, DC 20005  
Business Telephone: 202/589-3756

Ted Stanton

Richard Schnipke  
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Office Phone: 614.560.8549

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**INTERROGATORY NO. 2:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service provider in the local exchange area of the Company; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 2:**

Verizon Wireless objects to this request as vague as to the phrase “within the network(s).” To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that Verizon Wireless utilizes to exchange Section 251(b)(5) traffic with Petitioners, Verizon Wireless 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. Subject to those objections and without waiver thereof, Verizon Wireless has no direct connections established with any Petitioner.

**INTERROGATORY NO. 3:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the Commonwealth of Kentucky; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which the CMRS Carriers have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 3:**

Verizon Wireless objects to this request as vague as to the phrase “within the network(s).” To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that Verizon Wireless utilizes to exchange Section 251(b)(5) traffic with Petitioners, Verizon Wireless 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. Subject to that objection and without waiver thereof, Verizon Wireless has the following physical connections with ILECs in Kentucky:

<b><i>Carrier</i></b>	<b><i>CLLI</i></b>	<b><i>Verizon Wireless MSC</i></b>
Windstream	EZTWKYXA05T	Chandler
Windstream	LXTNKYXA01T	Louisville
Windstream	BRWLKYXADS1	Chandler
Windstream	SMRTKYXZ02T	Louisville
Windstream	MRHDKYXA02T	Cincinnati

BellSouth	OWBOKYMA1GT	Chandler Louisville
BellSouth	LSVLKYAP2GT	Louisville
BellSouth	MDVIKYMA02T	Chandler
BellSouth	WNCHKYMA02T	Louisville Cincinnati
BellSouth	DAVLKYMA02T	Louisville
BellSouth	CLCTKYXADS0	Chandler
BellSouth	LSVLKYSLDS0	Louisville
BellSouth	LSVLKYWEDS0	Louisville
BellSouth	LSVLKYBECG0	Louisville
BellSouth	LSVLKYBRDS0	Louisville

**INTERROGATORY NO. 4:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the MTA('s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 4:**

To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that Verizon Wireless utilizes to exchange Section 251(b)(5) traffic with Petitioners, Verizon Wireless 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. Subject to those objections and without waiver thereof, Verizon Wireless has identified the physical connections it has with ILECs in Kentucky in response to Interrogatory No. 3.

**INTERROGATORY NO. 5:**

State whether you have existing physical interconnection with the network(s) of any telecommunications service providers in the LATA('s) in which the Company's local exchange service area is located; if the answer to this interrogatory is in the affirmative, identify all

locations at which you have such physical interconnection, and with respect to each such location, identify the entity (if any) with which you have such physical interconnection.

**ANSWER TO INTERROGATORY NO. 5:**

To the extent this Interrogatory seeks information on physical connections with parties other than Petitioners or transit providers that Verizon Wireless utilizes to exchange Section 251(b)(5) traffic with Petitioners, Verizon Wireless 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. Verizon Wireless further objects to this request to the extent it seeks information related to physical connections Verizon Wireless may have outside the state of Kentucky. Such information is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections and without waiver thereof, Verizon Wireless has identified the physical connections it has in Kentucky in response to Interrogatory No. 3.

**INTERROGATORY NO. 6:**

With respect to each MTA within which you provide service, identify and describe the extent to which CMRS service coverage is made available within the Company's local exchange service area(s).

**ANSWER TO INTERROGATORY NO. 6:**

Verizon Wireless 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. Verizon Wireless objects to this request to the extent it asks Verizon Wireless to create documents not in existence at the time the request was made. Subject to those objections and without waiver thereof, Verizon Wireless' coverage on its CMRS network in Kentucky is shown on Confidential Exhibit A hereto.

**INTERROGATORY NO. 7:**

Identify the location of every antenna by which you provide CMRS service in the MTA('s) within which the Company is located.

**ANSWER TO INTERROGATORY NO. 7:**

Verizon Wireless objects to this request as vague with regard to the term "antennae," and because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Verizon Wireless further objects to this request as overbroad and as unduly burdensome, and to the extent it would require Verizon Wireless to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, Verizon Wireless states that Confidential Exhibit A hereto shows voice coverage generated by each wireless radio within the Verizon Wireless network in Kentucky.

**INTERROGATORY NO. 8:**

Identify the location of every antenna by which you provide CMRS service in each MTA in the Commonwealth of Kentucky. For each such location identified, identify the corresponding MTA in which such antenna is located.

**ANSWER TO INTERROGATORY NO. 8:**

Verizon Wireless objects to this request as vague with regard to the term “antennae,” and because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Verizon Wireless further objects to this request as overbroad and as unduly burdensome, and to the extent it would require Verizon Wireless to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, Verizon Wireless states that Exhibit A hereto shows voice coverage generated by each wireless radio within the Verizon Wireless network in Kentucky.

**INTERROGATORY NO. 9:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with BellSouth or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER TO INTERROGATORY NO. 9:**

Verizon Wireless objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, Verizon Wireless states that it has been delivering transit traffic to BellSouth during the course of these negotiations, i.e., since at least January 1, 2006. All transit traffic delivered by Verizon Wireless to BellSouth since that time was appropriate under the parties' interconnection agreement and has been allowed.

**INTERROGATORY NO. 10:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with Windstream or any of its predecessors in interest ("transit service provider"), and state whether such attempted transit traffic delivery to the Company was permitted by the transit service provider.

**ANSWER TO INTERROGATORY NO. 10:**

Verizon Wireless objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, Verizon Wireless states that it has not been delivering transit traffic to Windstream during the course of these negotiations, i.e., since at least January 1, 2006.



**INTERROGATORY NO. 11:**

State the date upon which you first sought to deliver traffic to the Company by means of a transit relationship with any third-party (other than those identified in the preceding two interrogatories) ("transit service provider"), identify the transit service provider through which this delivery was sought to be accomplished, and state whether the transit service provider permitted such attempted transit traffic delivery to the Company.

**ANSWER TO INTERROGATORY NO. 11:**

Verizon Wireless objects to this request as seeking information that is irrelevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, Verizon Wireless has not delivered transit traffic to any Petitioner through any companies other than BellSouth.

**INTERROGATORY NO. 12:**

Identify all agreements by which you first sought to deliver traffic to the Company by means of the transit arrangements described in the preceding three interrogatories. If no such agreements exist, so state your answer. If such traffic delivery was sought to be accomplished pursuant to an unwritten agreement, describe the terms of such agreement, identify the date (or approximate date, if no exact date is available) of such agreement, and identify all persons involved in negotiating such agreement for you and the third-party.

**ANSWER TO INTERROGATORY NO. 12:**

Verizon Wireless objects to this request as overbroad and seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to that objection and without waiver thereof, Verizon Wireless refers Petitioners to the interconnection agreements identified in Verizon Wireless's response to Petitioners' First Discovery Requests.

**INTERROGATORY NO. 13:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, indicate (for each transit service provider) the percentage of your traffic transited to the Company that is: (i) Type I interconnection traffic; and (ii) Type II interconnection traffic.

**ANSWER TO INTERROGATORY NO. 13:**

Verizon Wireless objects to this request as vague with regard to the term "Type I interconnection traffic." Subject to that objection and without waiver thereof, Verizon Wireless states that it considers all traffic it delivers to BellSouth to be delivered to a Petitioner for termination to be Type 2 interconnection traffic. Traffic delivered to a tandem switch is generally referred to as Type 2 interconnection traffic. Verizon Wireless is not aware of how the traffic would be categorized as between Bellsouth and Petitioner.

**INTERROGATORY NO. 14:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, identify (for each transit service provider) the scope of geographic areas from which your end-users originate such traffic.

**ANSWER TO INTERROGATORY NO. 14:**

See Confidential Exhibit A hereto, and Verizon Wireless' response to Interrogatory No. 3. In addition, Verizon Wireless does not today transit traffic through BellSouth's Winchester tandem to any RLEC. The only Verizon Wireless inter-switch trunking of traffic that is transited through BellSouth and terminated to a Petitioner is from Verizon Wireless' Nashville Hill Ave. switch to its Louisville switch, and between Verizon Wireless' Cincinnati switch and its Chandler switch.

**INTERROGATORY NO. 15:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please indicate (for each transit service provider): (i) what call detail records you create; (ii) what call detail records you create and provide to the transit service provider; and (iii) what call detail records you create and provide to the Company.

**ANSWER TO INTERROGATORY NO. 15:**

Verizon Wireless objects to this request as overbroad and as calling for information that is neither relevant nor reasonably calculated to lead to the discovery or admissible evidence. Verizon Wireless further objects to this request to the extent that it would require Verizon Wireless to create documents that do not otherwise exist. Subject to those objections and without waiver thereof, Verizon Wireless states that as a call is processed by a switch, a temporary memory location is generated and contains information about the call. The information in this temporary memory location is then used to create an Automatic Message Accounting ("AMA") call record, which exists at the switch for 24-48 hours. The AMA call records are moved from the switch and the information is sent to Verizon Wireless' billing system, which converts the binary AMA call record into a Call Detail Record ("CDR"). The fields within these CDRs are identified on Exhibit B hereto. Verizon Wireless does not have the capability to use information CDRs to measure and bill calls for intercarrier compensation purposes.

With regard to (ii) and (iii), Verizon Wireless states that it does not provide any call detail records to any transit provider or to any Petitioner.

**INTERROGATORY NO. 16:**

For traffic originated by you that is currently delivered to the Company by means of a transit arrangement with any of the transit service providers identified in the preceding interrogatories, please describe (for each transit service provider) the specific interconnection

trunking arrangement that you have in place with the transit service provider for the delivery, transit, and receipt of traffic to and from the Company. For purposes of this interrogatory, the phrase "specific interconnection trunking arrangement" should be construed to include, but not be limited to, information regarding whether such trunks are dedicated solely for the delivery and receipt of mobile CMRS traffic.

**ANSWER TO INTERROGATORY NO. 16:**

Verizon Wireless' tandem connections in Kentucky are identified in response to Interrogatory No. 3. The trunks between Verizon Wireless and each tandem provider contain only CMRS traffic, i.e., traffic that is originated by, or terminated to, a CMRS customer.

**INTERROGATORY NO. 17:**

Identify and describe all call detail record you provide to (i) any transit service provider identified in the preceding interrogatories, or (ii) the Company, and state whether such records can be used to determine the location of the cellular site serving your end-user customer(s) at the beginning of each call placed or received by your end-user customer.

**ANSWER TO INTERROGATORY NO. 17:**

Verizon Wireless does not provide any call detail records to any transit provider or to any Petitioner.

**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 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 TO REQUEST FOR PRODUCTION NO. 1:**

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. Verizon Wireless further objects to the extent it calls for the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections and without waiver thereof see Exhibits A and B hereto.

**REQUEST FOR PRODUCTION NO. 2:**

Provide representative call detail records for all call detail records identified in answer to Interrogatories 15 and 17.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

Verizon Wireless objects to this request as overbroad and to the extent it calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Verizon Wireless further objects to producing confidential information of customers or other carriers. Subject to those objections and without waiver thereof see Exhibits B hereto, which shows the headers for CRDs.

**REQUEST FOR PRODUCTION NO. 3:**

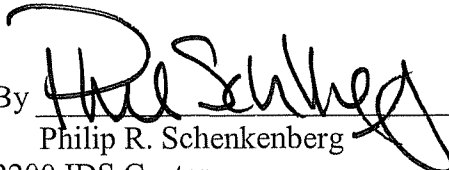
Provide all documentation (including, but not limited to, source documentation) used to determine the percentages of Type I and Type II interconnection traffic you transit to the Company.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

There are no documents responsive to this request.

Dated: September 22, 2006

**BRIGGS AND MORGAN, P.A.**

By  \_\_\_\_\_  
Philip R. Schenkenberg

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WIRELESS, GTE WIRELESS OF THE  
MIDWEST INCORPORATED, AND  
KENTUCKY RSA NO. 1 PARTNERSHIP

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of **VERIZON WIRELESS' RESPONSE TO PETITIONERS' SUPPLEMENTAL INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS** was on this ~~22<sup>nd</sup>~~ day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

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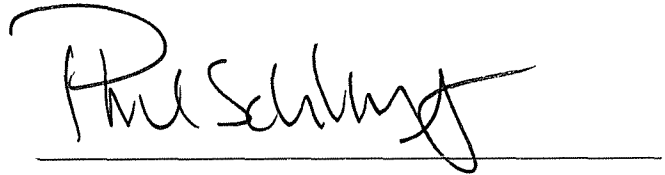
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A handwritten signature in black ink, appearing to read "Paul Selby", is written over a horizontal line.