#### JOHN N. HUGHES *Attorneyat law* professional service corporation 124 west todd street frankfort, kentucky 40601

TELEPHONE: (502) 227-7270

INHUGHES@fewpb.net

July 16, 2007

Ms. Beth A. O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602-0615 TELEFAX (502) 875-7059

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PUBLIC SERVICE COMMISSION

Re: Case No. 2007-00180: Petition of Sprint Communications Company L.P. and Sprint Spectrum L.P., d/b/a Sprint PCS for Arbitration of Rates, Terms, and Conditions of Interconnection with BellSouth Telecommunications, Inc., d/b/a AT&T Kentucky, d/b/a AT&T Southeast

Dear Beth:

Please file in the above-referenced docket an original and five (5) copies of Sprint's Response to Commission Staff's First Data Request. The delayed response is due to my failure to receive the Commission's order, as previously discussed with the staff.

If you have any questions regarding this filing please contact me.

submitted by: ph K Hugher

John N. Hughes 124 West Todd Street Frankfort, KY 40601

Counsel for: Sprint Communications Company L.P. and Sprint Spectrum L.P.

Enclosure

cc: Parties of record

# **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

Petition of Sprint Communications Company L.P. andCase No. 2007-00180Sprint Spectrum L.P. d/b/a Sprint PCS for Arbitration of<br/>Rates, Terms and Conditions of Interconnection<br/>Agreement with BellSouth Telecommunications, Inc.<br/>d/b/a/ AT&T Kentucky d/b/a AT&T SoutheastCase No. 2007-00180

# SPRINT'S RESPONSE TO COMMISSION STAFF'S FIRST DATA REQUEST

Sprint Communications Company L.P. and Sprint Spectrum L.P., d/b/a Sprint

PCS ("Sprint") hereby files this Response to the Commission Staff's First Data Request

in the above-styled case.

### **SPRINT'S RESPONSE**

1. Provide a list of other arbitration matters involving Sprint PCS that have been submitted to other state commissions wherein the issue presented concerned the commencement date for a new interconnection agreement in consideration of Federal Communication Order 06-189, Appendix F, Merger Commitment No. 4:

a. Provide the name of the Commission presiding over the arbitration.

b. Provide the case number for the arbitration.

# **RESPONSE:**

a. Sprint has filed arbitrations pertaining to the commencement date for a

new interconnection agreement in consideration of Federal Communication Order 06-

189, Appendix F, Merger Commitment No. 4 with the following Commissions:

- 1. Alabama Public Service Commission
- 2. Florida Public Service Commission

- 3. Georgia Public Service Commission
- 4. Louisiana Public Service Commission
- 5. Mississippi Public Service Commission
- 6. North Carolina Utilities Commission
- 7. Public Service Commission of South Carolina
- 8. Tennessee Regulatory Authority
- b. The case numbers for the arbitrations filed with the Commission in a. are:
  - 1. AL Docket No. 30510
    - 2. FL Docket No. 070249-TP
    - 3. GA Docket No. 25064-U
    - 4. LA Docket No. U-30179
    - 5. MS Docket No. 2007-AD-332
    - 6. NC Docket No. P-294, Sub 31
    - 7. SC Docket No. 2007-215-C
    - 8. TN Docket No. 07-00132

# Person Responsible: Mark G. Felton

2. For each arbitration matter listed in your response to Item No. 1, state if an Order has been issued by the presiding Commission wherein the Commission issued a ruling on the commencement date for the interconnection agreement.

- a. Provide the dates for the Orders.
- b. Provide a short summary of the Commission's ruling in each Order.
- c. Provide a copy of each Order as attachments to your response to this data request.

**RESPONSE:** As of the date of this Response, there have been no Commission Orders

issued in the arbitrations identified in Item No. 1 above ruling on the commencement date

for the interconnection agreement.

Person Responsible: Mark G. Felton

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the parties listed below by depositing same in the United States mail, First Class and postage prepaid, on the  $16^{th}$  day of July, 2007.

Mary K Keyer General Counsel - Kentucky AT&T Kentucky 601 W. Chestnut St., Room 407 Louisville, KY 40202

E. Earl Edenfield, Jr. John T. Tyler AT&T Midtown Center – Suite 4500 675 W. Peachtree Street Atlanta, GA 30375-0002

### CERTIFICATION

### STATE OF KANSAS

#### COUNTY OF JOHNSON

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Mark G. Felton, who, being by me first duly sworn, deposed and stated that:

On behalf of Sprint Communications Company L.P. and Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint"), he supervised the preparation of Sprint's Response to the Commission Staff's First Data Request, dated June 20, 2007, in Kentucky Public Service Commission Case No. 2007-00180, and he hereby certifies that Sprint's Response is true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

Mark G. Felton

SWORN TO AND SUBSCRIBED BEFORE ME THIS \_\_\_\_\_ DAY OF JULY, 2007.

NUTARY PIBLIC -- State of Kanses **ICSHI** 

My Commission Expires: MARCh 5, 2009