

COMMONWEALTH OF KENTUCKY

PUBLIC SERVICE COMMISSION

In the matter of:

RECEIVED

COMPLAINT OF SPRINT)
COMMUNICATIONS COMPANY L.P.)
AGAINST BRANDENBURG) CASE NO.
TELEPHONE COMPANY AND) 2008-00135
REQUEST FOR EXPEDITED RELIEF)
)

AUG 08 2008
PUBLIC SERVICE
COMMISSION

**SPRINT’S FIRST REQUESTS FOR INFORMATION TO
BRANDENBURG TELEPHONE COMPANY**

Sprint Communications Company L.P. (“Sprint”), by counsel, serves and files its First set of Request for Information to Brandenburg Telephone Company (“Brandenburg” or “Company”).

DEFINITIONS

1. "And" and "Or" shall mean "and/or."
2. “Affiliate” shall have the meaning as defined in 47 U.S.C. § 153(1).
3. “Company” shall mean Brandenburg Telephone Company.
4. “Communication" or "communications" shall mean all meetings, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, mailgrams, and all oral and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more persons.
5. The term or terms “you,” or “your” shall refer to the Company, its predecessor(s), if any, as well as its divisions, parent and subsidiary entities, all related companies for which the incumbent local exchange Carrier has partial or full ownership or control, all other companies sharing management with the Company, and the officers, directors,

employees, agents, representatives, and other personnel thereof, any entity through which the Company provides telecommunications service, and all Affiliates.

6. "CMRS" and "Commercial Mobile Radio Service" shall have the meaning defined and used by the Federal Communications Commission. *See* 47 C.F.R. §§ 20.3, 20.9(a)(4), (7), (11).
7. "Competitive Provider" means any non-incumbent local exchange provider of voice-telephone or voice-telephony substitute services to consumers, including but not limited to: a cable company, a Voice over Internet Protocol (VoIP) provider, a competitive local provider, a voice telephony provider, a CMRS provider, a video or IPTV provider, an internet service provider, a broadband service provider, or any other alternative provider of voice services.
8. "Concerning" and "concern" shall mean memorializing, mentioning, to be connected with, comprising, consisting, indicating, describing, referring, relating to, evidencing, showing, discussing, or involving in any way whatsoever the subject matter of the Request for Information.
9. "Describe" when used with respect to an occurrence, event, activity, or any transaction, means to provide a complete and detailed list of its nature, its time and place and to identify the persons present and involved. The term "describe" when used with respect to a document, means to provide a complete and detailed description of its nature and content. The term "describe," when used with respect to a communication other than a document, means to provide a complete and detailed description of its nature and content.
10. The term or terms "document", "documentation", "data", "material" and "information" shall include, but are not limited to, the following—regardless of format (*e.g.*, electronic,

paper copy or other form of audio, electronic or visual recording items: correspondence, memoranda, financial data, reports, investigations, studies, plans, communications, notes, notebooks, marginalia, telephone logs, recordings, opinions, decisions, photographs, drawings, sketches, graphic renderings, bulletins, pamphlets, circulars, articles, press releases, video tapes, data compilations, drafts, brochures, and other documents or tangible things of whatever description that may constitute or contain information within the scope of the Request for Information, which are in the possession, custody and control of the Company - including without limitation, any officers, directors, employees, agents, attorneys or other representatives or Company's Affiliates.

11. "Identify" or "state the identity of" means:

- (a) In the case of a person, to state the name; last known residence; employer or business affiliation; and occupation and business position held.
- (b) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.
- (c) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location of each copy and the identity of the present custodian; and the identity of the person(s) who can identify it.
- (d) In the case of a fact, an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or

belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained; and the documents or other writings which memorialize the instance.

12. "Oral communication" shall mean any verbal conversation or other statement from one person to another, including but not limited to, any interview, conference, meeting or telephone conversation.
13. "Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.
14. "Refer," "referring to," "relate," and "relating to" shall mean having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request.
15. "State commission" shall have the meaning as defined in 47 U.S.C. § 153(41).
16. "Telecommunications Carrier" shall have the meaning defined pursuant to 47 USC § 153(44).
17. "Telecommunications Traffic" shall have the meaning defined pursuant to 47 CFR § 51.701(b) and subject to 47 USC § 251(b)(5).
18. Words of gender shall be construed as including all genders, without limitation.
19. Words in the singular shall be construed to mean the plural or vice versa as appropriate.

INSTRUCTIONS

1. These Request for Information are continuing in nature, requiring you to change, supplement, and correct all responses to conform to available information, including such information as first becomes available to you after the responses hereto are filed and

made, should additional information become known or should information supplied in the responses prove to be incorrect or incomplete.

2. Each Request for Information shall be answered separately. The Response to each Request for Information provided should first restate the Request for Information. In producing documents in response to these Requests for Information, you should number each document and indicate the specific Request for Information in response to which the document is being produced. To the extent that any document falls within the scope of multiple Requests for Information, multiple productions are not contemplated; one production with reference to each of the multiple Requests for Information is sufficient.
3. In answering these Requests for Information, furnish all information that is available to you or may be reasonably ascertained by you or otherwise subject to your Company's knowledge, possession, custody or control.
4. As part of each of response to a Request for Information, identify the person or persons most knowledgeable about such response, the person or persons responsible for the preparation of such response, and the name of the witness in this proceeding who will sponsor the answer and can vouch for its accuracy.
5. If any document inquired about has been lost or destroyed, identify the document by author, date, subject matter, place, manner, reason and the circumstances of the loss or destruction, the last known location of the document, and the person who has knowledge concerning the manner in which it was lost or destroyed.
6. If you object to any part of a Request for Information, answer all parts of such requests to which you do not object, and as to each part to which the Company does object, separately set forth the specific basis for the objection.

7. If form of privilege or other protection from disclosure is claimed as a ground for withholding information within a document that is responsive to a Request for Information, set forth with respect to such document:

- (a) the date and number of pages of the document;
- (b) the identity of the author(s) and or preparer(s);
- (c) the identity of the addressee, if any;
- (d) the title;
- (e) the type of tangible thing (e.g., letter, memorandum, telegram, chart, report, recording disc);
- (f) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (g) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (h) the identity of the present custodian(s);
- (i) the nature of your claim of non-discoverability (e.g., attorney client privilege); and,
- (j) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit Sprint to make a full determination as to whether the claim is valid.

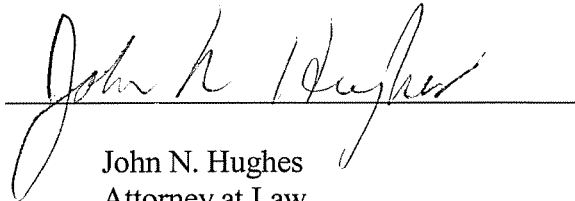
REQUESTS FOR INFORMATION

1. Describe with specificity the corporate structure of the Company including:
 - a. a listing of all affiliates and subsidiaries;
 - b. a complete list of all officers and directors.

2. Provide a copy of Brandenburg Telephone Company's Audited Financial Statements for the last three fiscal years.
3. Describe with specificity the process, including the types of technology (i.e. systems, programs, calculations), used by the Company to identify the jurisdiction of any and all switched access traffic billed to Sprint's interexchange carrier operations.
4. Provide a complete listing of any specific agreements, arrangements or understandings concerning the exchange of interexchange traffic between Brandenburg and any third party regarding the application of a Percent of Interstate Use ("PIU") factor, as such term is used in either the Duo County Telephone Cooperative Corp., Inc., PSC KY NO. 2A, for intrastate services and/or NECA Tariff No 5, including but not limited to any settlement or arrangement which resulted from the complaint proceeding of Brandenburg Telephone Company v. Global Crossing, Inc. in Case No. 2006-00341.
5. Provide a monthly historical analysis of the Company's billed Minutes of Use (MOU) and dollars for Interstate and Intrastate MOU for each of the following years: 2005, 2006 and 2007.
6. Provide a monthly historical analysis of the Company's Minutes of Use (MOU) for which the process described in response to Sprint's Request for Information 3 above is unable to identify the jurisdiction of the MOU for each of the following years: 2005, 2006 and 2007.

- a. For the MOU identified in this response describe with specificity the process followed by the Company to identify the jurisdiction of the MOU for billing.
7. Provide copies of all documents upon which the Company relies to support any response to any Request for Information.
8. Within the response to each Request for Information, identify each person who assisted in the preparation of that Request for Information response, or who provided information for the purpose of preparing such response.

This 8th day of August, 2008.

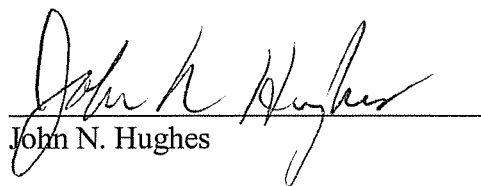


John N. Hughes
Attorney at Law
124 West Todd Street
Frankfort, Kentucky 40601
(502) 227-7270 (o)
(502) 875-7059 (fax)

Attorney for Sprint

CERTIFICATE OF SERVICE

I certify that the First Request for Information of Sprint Communications Company L.P. has been served by email and first class mail on John Selent and Edward Depp, Dinsmore & Shohl, 1400 PNC Plaza, 400 West Jefferson ST., Louisville, KY 40202, this the 8th day of August, 2008.



John N. Hughes