

BRIGGS AND MORGAN

PROFESSIONAL ASSOCIATION

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pschenkenberg@briggs.com

September 7, 2006

VIA FEDERAL EXPRESS

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

RECEIVED

SEP 08 2006

PUBLIC SERVICE
COMMISSION

Re: 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

Dear Ms. O'Donnell:

Enclosed herewith please find for filing with the Commission an original and five (5) copies of the following documents in the above-referenced matter.

- Verizon Wireless' Response to Petitioners' Interrogatories and Document Requests; and
- T-Mobile's Response to Petitioner's Interrogatories and Document Requests.

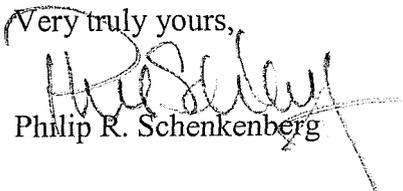
Also enclosed are the following documents with copies as indicated:

- Verizon Wireless' Petition for Confidential Treatment;
- Affidavit of Elaine Critides in Support of Petition for Confidential Treatment;
 - Confidential Exhibit 1;
 - Exhibit 1 with confidential information redacted (10 copies);
- T-Mobile's Petition for Confidential Treatment;
- Affidavit of Dan Williams in Support of Petition for Confidential Treatment.
 - Confidential Exhibit 1;
 - Exhibit 1 with confidential information redacted (10 copies).

BRIGGS AND MORGAN

Beth O'Donnell
September 7, 2006
Page 2

Please do not hesitate to contact me if you should have any questions concerning this filing.

Very truly yours,

Philip R. Schenkenberg

PRS/smo
Enclosures

cc: John Selent
James Dean Liebman (w/o confidential information)
Bhogan M. Modi (w/o confidential information)
William G. Francis (w/o confidential information)
Thomas Sams (w/o confidential information)
NTCH-West, Inc. (w/o confidential information)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 08 2006

PUBLIC SERVICE
COMMISSION

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

Petition of Duo County 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. 2006-00217

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

**VERIZON WIRELESS' RESPONSE TO PETITIONERS' INTERROGATORIES
AND DOCUMENT REQUESTS**

Come now Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated, and Kentucky RSA No. 1 Partnership ("Verizon Wireless") and responds 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:

II. RESPONSES TO INTERROGATORIES

1. Identify each person who participated in the consideration and preparation of your answers to these Discovery Requests and identify to which particular Discovery Request each person was involved in answering.

ANSWER:

Verizon Wireless objects to providing the home phone numbers of identified individuals. Subject to that objection, Verizon Wireless responds as follows:

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

Beverly Morgan
Title: Analyst-Network
Business Address: 250 E 96th St, Indianapolis, IN 46240
Business Telephone: 317/816-6321

John Grimes
Sr. Engineer-Transport (Network)
Business Address: 250 E 96th St, Indianapolis, IN 46240
Business Telephone: 317/816-6488

Stephanie Lawson-Muhammad
Manager Transport Engineering IN/KY
Business Address: 250 E 96th St, Indianapolis, IN 46240
Business Telephone: (317) 816-6430

Sharon Brown
Business Address: 250 E 96th St, Indianapolis, IN 46240
Business Telephone: (317) 816-6430

Elaine Critides
Title: Senior Attorney
Business Address: 1300 I Street NW, Suite 400, Washington, DC 20005
Business Telephone: 202/589-3756

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

Douglas F. Brent
Attorney
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street

Louisville, KY 40202
502 568 5734 (Bus.)

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:

Verizon Wireless has not at this time determined the witnesses it will call at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

3. For each person identified in response to Interrogatory No.2 above, state the facts known and substance of his/her expected testimony at the Evidentiary Hearing.

ANSWER:

Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

Verizon Wireless has not at this time determined the documents that will be sponsored by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

Verizon Wireless has not at this time determined the expert testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

ANSWER:

Verizon Wireless objects to this request as vague with regard to the term "contemplated exchanging traffic." Verizon Wireless further objects to the extent this request seeks information regarding traffic that would not be delivered under the terms of the arbitrated agreement, i.e., traffic delivered by Verizon Wireless to a wholesale interexchange carrier to be delivered to Petitioner pursuant to applicable access tariffs. Verizon Wireless interprets this request as seeking information regarding Verizon Wireless's use of Intermediary Carriers to deliver traffic to Petitioner.

Subject to the above, Verizon Wireless expects to exchange traffic indirectly through BellSouth tandems with all Petitioners, and may exchange traffic with certain Petitioners through Windstream Kentucky East.

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:

Verizon Wireless's interconnection agreements with BellSouth and Windstream Kentucky East can be obtained through the Commission's web site:

http://162.114.3.165/PSCICA/1997/1997-146/00486-AM_021403.pdf (BellSouth)

http://162.114.3.165/PSCICA/0000/00758/00758-AI_062205.pdf (Windstream Kentucky East)

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:

Verizon Wireless believes that one-way direct connections can be established at either party's option, but that two-way direct trunks should be established on the mutual agreement of the parties' technical staff, based on sound engineering and economic analysis. Because there is a natural economic threshold that determines whether dedicated transport is desirable, there is no need for a strict threshold. When based on mutual agreement, direct connections are established when that becomes more efficient than indirect connections.

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 the 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:

As set forth in the Consolidated Response to Arbitration Petitions, Verizon Wireless recommends that if Petitioner fails to meet its burden of demonstrating forward-looking cost-based rates for terminating traffic, that the Commission should use the FCC's proxy rates for transport and termination as set forth in 47 C.F.R. § 51.513. It would be reasonable for the Commission to use these benchmarks instead of bill-and-keep in light of RLECs' failure to meet their burden of proof. Additional rationale will be filed as called for under the procedural schedule.

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:

Verizon Wireless has not yet determined the intraMTA and interMTA traffic factors it will propose be included in the interconnection agreement. After examining its own information and information received in discovery, it will identify proposed factors in testimony that will be filed as called for under the procedural schedule.

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:

Verizon Wireless has not been provided with a reason why such forecasts are necessary for the Petitioners to engineer their networks. Verizon Wireless is willing to consider additional information provided by Petitioners in this regard.

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:

Verizon Wireless objects to this request as overbroad and as seeking information that is not relevant. Current and projected traffic levels are relevant to the issues in this docket, but information on past traffic exchanged between the parties is not. Verizon Wireless further objects to the extent this request seeks information regarding traffic that would not be delivered under the terms of the arbitrated agreement, i.e., traffic delivered by Verizon Wireless to a wholesale interexchange carrier to be delivered to Petitioner pursuant to applicable access tariffs. Verizon Wireless further objects to the extent this seeks information that it does not maintain, or that would be burdensome to collect from other sources. Verizon Wireless does not have systems that would allow it to measure and bill traffic for intercarrier compensation purposes.

Subject to those objections and without waiver thereof, Verizon Wireless has been able to identify some MOU information for a recent time period, and that MOU information is identified and described on Confidential Exhibit 1 hereto. Exhibit 1 contains information on i) the time period during which traffic was measured, ii) minutes of use measured and ii) the source of the measurement.

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:

Verizon Wireless does not have such forecasts, but anticipates that MOU will increase gradually over time, with the ratio between land-to-mobile and mobile-to-land traffic trending towards being more in balance.

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:

Both BellSouth and Windstream Kentucky East assess a per-minute transit rate. In addition, Verizon Wireless pays for facilities to reach the applicable tandem switch. Copies of these interconnection agreements can be found on the Commission's web site as set forth in the Response to Interrogatory 8.

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:

Verizon Wireless is not aware of the terms of any arrangements between the Petitioner and BellSouth or Windstream Kentucky East. In accordance with applicable law, Petitioner is responsible for taking action to establish such rates and terms through negotiation or other action.

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:

Copies of the applicable interconnection agreements can be found on the Commission's web site as set forth in the Response to Interrogatory 8, and do not contain any such volume discounts.

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:

Verizon Wireless has no direct or indirect ownership interest in either BellSouth or Windstream Kentucky East.

19. Identify and explain in detail all financial, technical, operational, and other factors the 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:

As a CMRS provider Verizon Wireless has the right to choose to connect indirectly with Petitioner. Verizon Wireless generally chooses indirect interconnection where it more efficient than establishing dedicated facilities. With indirect interconnection, a party must deliver traffic to an intermediary carrier, and pay the intermediary carrier a transit fee to deliver a call to the terminating carrier. With direct connection, a party avoids the transit charge, but must establish and manage new network facilities and pay a per-month facilities charge. In most cases, traffic levels between Verizon Wireless and rural telephone companies like the Petitioner, as well as geographic distances between Verizon Wireless's switch(es) and the Petitioner's switch(es), are such that it is more efficient to maintain indirect interconnection. Verizon Wireless proposes that each party be allowed to choose direct connection based on the financial and technical facts

specific to its situation. Additional information and rationale may be provided in Verizon Wireless's testimony, which will be filed in accordance with the procedural schedule.

20. For each respective CMRS Carrier, identify all States or Commonwealths in which the such 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:

With regard to subpart (i) Verizon Wireless objects to this request to the extent it seeks production of rates Verizon Wireless has voluntarily agreed to in other jurisdictions. Voluntary agreements as to reciprocal compensation rates do not need to be based on TELRIC in order to be approved by a state commission. As a result, rates that Verizon Wireless has agreed to elsewhere are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Verizon Wireless further objects to this request as burdensome in light of the number of jurisdictions in which Verizon Wireless operates and the difficulty of determining how negotiated rates were derived.

With regard to subpart (ii) Verizon Wireless has not been ordered 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 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:

With regard to subpart (i) Verizon Wireless objects to this request to the extent it seeks production of rates Verizon Wireless has voluntarily agreed to in other jurisdictions. Voluntary agreements as to reciprocal compensation rates do not need to be based on TELRIC in order to be approved by a state commission. As a result, rates that Verizon Wireless has agreed to elsewhere are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Verizon Wireless further objects to this request as burdensome in light of the number of jurisdictions in which Verizon Wireless operates and the difficulty of determining how negotiated rates were derived.

Subject to that objection Verizon Wireless states that with regard to subpart (ii), Verizon Wireless exchanges traffic in Illinois at rates determined by the Illinois Commerce Commission to be TELRIC-based. *Petition of Hamilton County Telephone Co-op et al. for Arbitration Under*

the Telecommunications Act to Establish Terms and Conditions for Reciprocal Compensation with Verizon Wireless and Its Constituent Companies, ICC Docket Nos. 05-0644 – 05-0649; 05-067 Consolidated. Jason Hendricks provided testimony on behalf of Illinois ILECs, and Don Wood provided testimony on behalf of Verizon Wireless. The rates as approved are as follows:

ILEC	Rate per MOU
Grafton Tel. Co.	\$0.00964
LaHarpe Tel. Co.	\$0.01169
Hamilton County Tel. Co-op	\$0.01652
Marseilles Tel. Co.	\$0.00342
McDonough Tel. Co-op, Inc.	\$0.01645
Metamora Tel. Co.	\$0.00673
Mid-Century Tel. Coop, Inc.	\$0.01738

Verizon Wireless is also participating in ongoing proceedings in Michigan and Tennessee in which rural ILECs are being required to demonstrate TELRIC rates, but no rates have been set at this time.

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

ANSWER:

BellSouth and Windstream Kentucky East.

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:

With indirect interconnection, Verizon Wireless proposes that each party be responsible to pay for facilities to its chosen Intermediary Carrier, and to pay the Intermediary Carrier any applicable transit charges to deliver the call to the terminating party. The terminating party would then charge the originating party a per MOU reciprocal compensation rate.

With direct interconnection, Verizon Wireless proposes that each party be responsible to pay the cost of facilities to deliver its own traffic to the terminating carrier's network. The terminating party would then charge the originating party a per MOU reciprocal compensation rate.

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:

Verizon Wireless believes this is an issue to be resolved between Petitioner and the Intermediary Carrier. See also response to Interrogatory 23.

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:

Verizon Wireless objects to this request as vague and duplicative. See response to Interrogatory 11.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in, referenced, referred to, reviewed, consulted, or relied upon in any way in responding to any of the Interrogatories or Requests for Admission propounded herein.

RESPONSE:

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

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

RESPONSE:

Verizon Wireless has not at this time determined the documents that will be sponsored by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

RESPONSE:

Verizon Wireless has not at this time determined the witnesses that will testify at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

RESPONSE:

Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

6. Produce all documents that refer to, relate to, or evidence any evaluation, analyses, studies, or reports made by, tests performed by, or conclusions reached by any expert witness you expect to testify on your behalf at the Evidentiary Hearing.

RESPONSE:

Verizon Wireless objects to this request as overbroad and burdensome. Subject to that objection, Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

Verizon Wireless objects to this request as overbroad, burdensome, and vague. Verizon Wireless further objects to this request to the extent it seeks information that is subject to the

attorney-client or work product privilege. Subject to that objection, Verizon Wireless is not at this time aware of any documents that are responsive to this request.

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.

RESPONSE:

Verizon Wireless has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

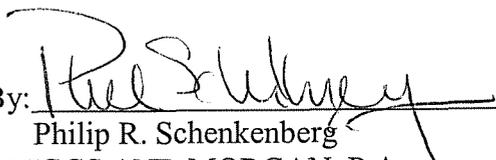
Verizon Wireless objects to this request to the as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Voluntary agreements as to reciprocal compensation rates do not need to be based on TELRIC in order to be approved by a state commission. Verizon Wireless further objects to this request as burdensome in light of the number of jurisdictions in which Verizon Wireless operates and the difficulty of determining how negotiated rates were derived.

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.

RESPONSE:

Verizon Wireless objects to this request as overbroad and burdensome to the extent it seeks all documents that "refer to, relate to, or otherwise reference" the applicable interconnection agreements. Subject to that objection Verizon Wireless's interconnection agreements with BellSouth and Windstream Kentucky East can be found on the Commission's web site. See Response to Interrogatory 8.

Dated: September 6, 2006

By: 
Philip R. Schenkenberg
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and

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Douglas F. Brent
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kendrick.riggs@skofirm.com

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of **T-MOBILE'S RESPONSE TO PETITIONERS' INTERROGATORIES AND DOCUMENT REQUESTS** was on this 1 th day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

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

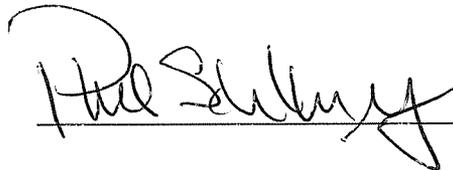
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NTCH-WEST, INC.
1970 N. Highland Avenue
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Jackson, Tennessee 38305



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

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

II. RESPONSES TO INTERROGATORIES

1. Identify each person who participated in the consideration and preparation of your answers to these Discovery Requests and identify to which particular Discovery Request each person was involved in answering.

ANSWER:

T-Mobile objects to providing the home phone numbers of identified individuals.

Subject to that objection, T-Mobile responds as follows:

Greg Tedesco
T-Mobile USA, Inc.
Director, Intercarrier Relations
1855 Gateway Blvd.

Room 937
Concord, CA 94520
925-521-5583 (Bus phone)

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Dan Williams
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Corporate Counsel
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Philip R. Schenkenberg
Briggs and Morgan, P.A.
Attorney
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Douglas F. Brent
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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:

T-Mobile has not at this time determined the witnesses it will call at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

3. For each person identified in response to Interrogatory No.2 above, state the facts known and substance of his/her expected testimony at the Evidentiary Hearing.

ANSWER:

T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

T-Mobile has not at this time determined the documents that will be sponsored by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

T-Mobile has not at this time determined the expert testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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:

T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

ANSWER:

T-Mobile objects to this request as vague with regard to the term "contemplated exchanging traffic." T-Mobile further objects to the extent this request seeks information regarding traffic that would not be delivered under the terms of the arbitrated agreement, i.e., traffic delivered by T-Mobile to a wholesale interexchange carrier to be delivered to Petitioner pursuant to applicable access tariffs. T-Mobile interprets this request as seeking information regarding T-Mobile's use of Intermediary Carriers to deliver traffic to Petitioner.

Subject to the above, T-Mobile expects to exchange traffic indirectly through BellSouth tandems with all Petitioners except North Central Telephone Cooperative, Inc. T-Mobile expects to exchange traffic with North Central Telephone Cooperative, Inc. through Windstream Kentucky East.

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:

T-Mobile's interconnection agreements with BellSouth and Windstream Kentucky East can be obtained through the Commission's web site:

<http://162.114.3.165/PSCICA/1997/1997-233/> (BellSouth)

<http://162.114.3.165/PSCICA/0000/00409/> and

<http://162.114.3.165/PSCICA/1997/1997-183/> (Windstream Kentucky East f/k/a Alltel f/k/a Verizon)

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:

T-Mobile believes that one-way direct connections can be established at either party's option, but that two-way direct trunks should be established on the mutual agreement of the parties' technical staff, based on sound engineering and economic analysis. Because there is a natural economic threshold that determines whether dedicated transport is desirable, there is no need for a strict threshold. When based on mutual agreement, direct connections are established when that becomes more efficient to both parties than indirect connections.

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 the 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:

As set forth in the Consolidated Response to Arbitration Petitions, T-Mobile recommends that if Petitioner fails to meet its burden of demonstrating forward-looking cost-based rates for terminating traffic, that the Commission should use the FCC's proxy rates for transport and termination as set forth in 47 C.F.R. § 51.513, if not bill and keep.

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:

T-Mobile has not yet determined the intraMTA and interMTA traffic factors it will propose be included in the interconnection agreement. After examining its own information and information received in discovery, it will identify proposed factors in testimony that will be filed as called for under the procedural schedule.

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:

T-Mobile has not been provided with a reason why such forecasts are necessary for the Petitioners to engineer their networks. T-Mobile is willing to consider additional information provided by Petitioners in this regard.

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:

T-Mobile objects to this request as overbroad and as seeking information that is not relevant. Current and projected traffic levels are relevant to the issues in this docket, but information on past traffic exchanged between the parties is not. T-Mobile further objects to the extent this request seeks information regarding traffic that would not be delivered under the terms of the arbitrated agreement, i.e., traffic delivered by T-Mobile to a wholesale interexchange carrier to be delivered to Petitioner pursuant to applicable access tariffs. T-Mobile further objects to the extent this seeks information that it does not maintain, or that would be burdensome to collect from other sources. T-Mobile does not have systems that would allow it to measure and bill traffic for intercarrier compensation purposes.

Subject to those objections and without waiver thereof, Confidential Exhibit 1 contains mobile-to-land MOU information for a current time period that T-Mobile has calculated based on BellSouth transit reports. Confidential Exhibit 1 is being produced to in accordance with the Parties' Protective Agreement.

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:

T-Mobile does not have such forecasts, but anticipates that MOU will increase gradually over time, with the ratio between land-to-mobile and mobile-to-land traffic trending towards being more in balance.

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:

Both BellSouth and Windstream Kentucky East assess a per-minute transit rate. In addition, T-Mobile pays for facilities to reach the applicable tandem switch. Copies of these interconnection agreements can be found on the Commission's web site as set forth in the Response to Interrogatory 8.

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:

T-Mobile is not aware of the terms of any arrangements between the Petitioner and BellSouth or Windstream Kentucky East. In accordance with applicable law, Petitioner is responsible for taking action to establish such rates and terms through negotiation or other action.

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:

Copies of the applicable interconnection agreements can be found on the Commission's web site as set forth in the Response to Interrogatory 8, and do not contain any such volume discounts.

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:

T-Mobile has no direct or indirect ownership interest in either BellSouth or Windstream Kentucky East.

19. Identify and explain in detail all financial, technical, operational, and other factors the 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:

Section 47 U.S.C. § 251(a) allows for indirect interconnection, and as a CMRS provider T-Mobile has the right to choose to connect indirectly with Petitioner. T-Mobile generally chooses indirect interconnection where it more efficient than establishing dedicated facilities. With indirect interconnection, a party must deliver traffic to an intermediary carrier, and pay the intermediary carrier a transit fee to deliver a call to the terminating carrier. With direct connection, a party avoids the transit charge, but must establish and manage new network facilities and pay a per-month facilities charge. In most cases, traffic levels between T-Mobile and rural telephone companies like the Petitioner are such that it is more efficient to maintain indirect interconnection. T-Mobile proposes that each party be allowed to choose direct connection based on the financial and technical facts specific to its situation. Additional information and rationale may be provided in T-Mobile's testimony, which will be filed in accordance with the procedural schedule.

20. For each respective CMRS Carrier, identify all States or Commonwealths in which the such 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:

With regard to subpart (i) T-Mobile objects to this request to the extent it seeks production of rates T-Mobile has voluntarily agreed to in other jurisdictions. When state commissions review and approve voluntary agreements, they do not, and need not, determine whether negotiated rates meet TELRIC standards. As a result, voluntary agreements that T-Mobile has agreed to elsewhere are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-Mobile further objects to this request as burdensome in light of the number of jurisdictions in which T-Mobile operates and the difficulty of determining how negotiated rates were derived.

With regard to subpart (ii) T-Mobile has not been ordered 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 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:

With regard to subpart (i) T-Mobile objects to this request to the extent it seeks production of rates T-Mobile has voluntarily agreed to in other jurisdictions. With regard to subpart (i) T-Mobile objects to this request to the extent it seeks production of rates T-Mobile has voluntarily agreed to in other jurisdictions. As a result, voluntary agreements that T-Mobile has agreed to elsewhere are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. T-Mobile further objects to this request as burdensome in light of the number of jurisdictions in which T-Mobile operates and the difficulty of determining how negotiated rates were derived.

Subject to that objection T-Mobile states that with regard to subpart (ii), T-Mobile exchanges traffic in Missouri at rates determined by the Missouri Commission to be TELRIC-based. Those rates were approved in an order dated March 23, 2006. Robert Schoonmaker provided testimony on behalf of Missouri telephone companies, and Craig Conwell provided testimony on behalf of T-Mobile. The rates as approved are as follows:

<u>ILEC</u>	<u>RATE PER MOU</u>
BPS	\$0.0094
Cass County	\$0.0088
Citizens Higginsville	\$0.0074
Craw-Kan	\$0.0257
Ellington	\$0.0277
Farber	\$0.0180
Granby	\$0.0054
Grand River Mutual	\$0.0209

Green Hills	\$0.0269
Holway	\$0.0383
Iamo	\$0.0411
Kingdom	\$0.0230
KLM	\$0.0211
Lathrop	\$0.0069
Le-Ru	\$0.0167
Mark Twain Rural	\$0.0289
McDonald County	\$0.0083
Miller	\$0.0083
New Florence	\$0.0078
Oregon Farmers	\$0.0108
Peace Valley	\$0.0166
Rock Port	\$0.0273
Steelville	\$0.0095

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

ANSWER:

Bellsouth and Windstream Kentucky East.

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:

With indirect interconnection, T-Mobile proposes that each party be responsible to pay for facilities to its chosen Intermediary Carrier, and to pay the Intermediary Carrier any applicable transit charges to deliver the call to the terminating party. The terminating party would then charge the originating party a per MOU reciprocal compensation rate.

With direct interconnection, T-Mobile proposes that each party be responsible to pay the cost of facilities to deliver its own traffic to the terminating carrier's network. The terminating party would then charge the originating party a per MOU reciprocal compensation rate.

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:

T-Mobile believes this is an issue to be resolved between Petitioner and the Intermediary Carrier. See also response to Interrogatory 23.

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:

T-Mobile objects to this request as vague and duplicative. See response to Interrogatory 11.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in, referenced, referred to, reviewed, consulted, or relied upon in any way in responding to any of the Interrogatories or Requests for Admission propounded herein.

RESPONSE:

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

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

RESPONSE:

T-Mobile has not at this time determined the documents that will be sponsored by its witnesses at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

RESPONSE:

T-Mobile has not at this time determined the witnesses that will testify at the hearing. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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

RESPONSE:

T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

6. Produce all documents that refer to, relate to, or evidence any evaluation, analyses, studies, or reports made by, tests performed by, or conclusions reached by any expert witness you expect to testify on your behalf at the Evidentiary Hearing.

RESPONSE:

T-Mobile objects to this request as overbroad and burdensome. Subject to that objection, T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

T-Mobile objects to this request as overbroad, burdensome, and vague. T-Mobile further objects to this request to the extent it seeks information that is subject to the attorney-client or work product privilege. Subject to that objection, T-Mobile is not at this time aware of any documents that are responsive to this request.

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.

RESPONSE:

T-Mobile has not at this time determined the testimony that will be offered by its witnesses at the hearing, and cannot at this time identify documents responsive to the above request. Prefiled testimony will be served in accordance with the Commission's scheduling order.

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.

RESPONSE:

T-Mobile objects to this request to the as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. With regard to subpart (i) T-Mobile objects to this request to the extent it seeks production of rates T-Mobile has voluntarily agreed to in other jurisdictions. T-Mobile further objects to this request as burdensome in light of the number of jurisdictions in which T-Mobile operates and the difficulty of determining how negotiated rates were derived.

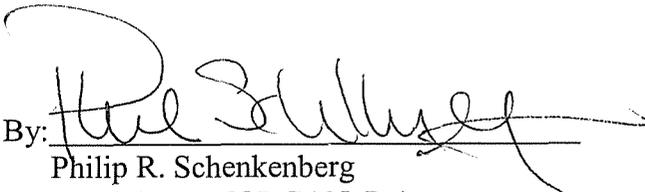
10. Produce all documents that refer to, relate to, or otherwise reference the CMRS Carriers' agreements, understandings, and/or contractual relationships with the Intermediary Carriers identified in response to Interrogatory No. 7.

RESPONSE:

T-Mobile objects to this request as overbroad and burdensome to the extent it seeks all documents that "refer to, relate to, or otherwise reference" the applicable interconnection agreements. Subject to that objection T-Mobile's interconnection agreements with BellSouth and Windstream Kentucky East can be found on the Commission's web site. See Response to Interrogatory 8.

Dated: September 6, 2006

By:


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ATTORNEYS FOR T-MOBILE USA, INC.,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of **VERIZON WIRELESS'S RESPONSE TO PETITIONERS' INTERROGATORIES AND DOCUMENT REQUESTS** was on this 7th day of September, 2006 served via electronic and United States mail, postage prepaid to the following:

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