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PROFESSIONAL SERVICE CORPORATION  
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October 11, 2006

**RECEIVED**

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

OCT 11 2006

PUBLIC SERVICE  
COMMISSION

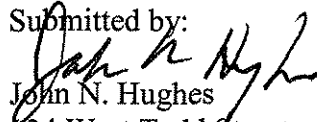
Re: Sprint Spectrum L.P. and SprintCom, Inc, d/b/a Sprint PSC: Case Nos. 2006-00215, 2006-00217, 2006-00218, 2006-00220, 2006-00252; 2006-00255; 2006-00288; 2006-00292; 2006-00294; 2006-00296; 2006-00298; 2006-00300

Dear Beth:

Please file the attached supplemental responses to the RLEC's initial discovery request Interrogatory 4 and Request for Production of Documents 1 on behalf of Sprint Spectrum L.P. and SprintCom, Inc., d/b/a Sprint PCS for filing in each of the referenced cases. An additional five copies are also being filed.

If you have any questions about this filing, please contact me.

Submitted by:

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

William R. Atkinson  
Sprint Nextel  
233 Peachtree St., N.E., Suite 2200  
Atlanta, GA 30309  
Counsel for: Sprint Spectrum L.P., on behalf of  
itself and Sprintcom, Inc. d/b/a Sprint PCS



Petition of North Central Telephone Cooperative Corporation, For Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with American Cellular Corporation f/k/a ACC Kentucky License LLC, Pursuant To the Communications Act of 1934, As Amended by the Telecommunications Act of 1996

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Case No. 2006-00252

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

Sprint Spectrum L.P., on behalf of itself and SprintCom, Inc., d/b/a Sprint PCS ("Sprint PCS"); hereby files this Supplemental Response to the "Interrogatories and Requests for Production of Documents to CMRS Carriers" served on Sprint PCS by Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard") which were adopted and served on Sprint PCS by Duo County Telephone Cooperative Corporation, Inc. ("Duo County"), Logan Telephone Cooperative, Inc. ("Logan"), West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky"), and North Central Telephone Cooperative Corporation ("North Central") by letter dated August 23, 2006. Sprint PCS renews and incorporates herein by reference all objections asserted in its initial Response filed on or about September 7, 2006. Without waiving any of those objections, Sprint PCS supplements its earlier responses as follows:

## **INTERROGATORIES**

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").

**SUPPLEMENTAL ANSWER:** Direct Testimony and Rebuttal Testimony of witness Randy G. Farrar has been pre-filed 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.

**SUPPLEMENTAL ANSWER:** See pre-filed Testimony and Rebuttal Testimony of witness Randy G. Farrar.

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.

**SUPPLEMENTAL ANSWER:** The documents Mr. Farrar intends to use, reference, or rely upon during his testimony are identified in his pre-filed Direct Testimony and Rebuttal Testimony.

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.

**SUPPLEMENTAL ANSWER:** Mr. Farrar has filed testimony as an expert.

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.

**SUPPLEMENTAL ANSWER:** Sprint PCS objects to this interrogatory on the basis that it is overbroad. Mr. Farrar has cited specific facts and opinions related to this proceeding in his pre-filed Direct Testimony and Rebuttal Testimony.

### **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.

**SUPPLEMENTAL ANSWER:** Sprint PCS objects to this request as overbroad and unduly burdensome and to the extent it seeks documents subject to the attorney-client privilege. Subject to those objections and without waiving them, Sprint PCS responds as follows: Witness Farrar references "A Survey of Unbundled Network Element Prices in the United States (Updated March 2006)," Billy Jack Gregg, Public Service Commission of West Virginia in his Direct Testimony. He references "AUS Telephone Plant Index," January 1, 2006 in his Rebuttal Testimony. Both documents are provided with this Supplemental Response.

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

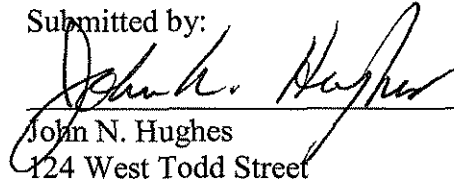
opinions and all documents that the expert reviewed, whether or not the documents were relied upon in forming his/her opinions.

**SUPPLEMENTAL ANSWER:** Sprint PCS objects to this request on the basis that it is overbroad and seeks information that may be subject to the attorney-client privilege. Subject to that objection and without waiving it, Mr. Farrar identifies documents upon which he relies in his Direct Testimony and Rebuttal Testimony.

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

**SUPPLEMENTAL ANSWER:** See Supplemental Answers to Interrogatory 4 and Request 5.

Submitted by:



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

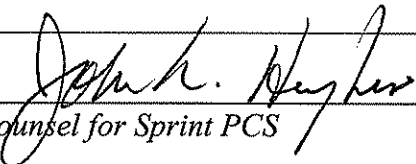
William R. Atkinson  
Sprint Nextel  
233 Peachtree St., N.E.  
Suite 2200  
Atlanta, GA 30309

Counsel for: Sprint Spectrum L.P., on behalf  
of itself and Sprintcom, Inc. d/b/a Sprint  
PCS

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the parties listed below by electronic mail, or by depositing same in the United States mail, First Class and postage prepaid, the 11th day of October, 2006.

William G. Francis Francis, Kendrick and Francis 504 First Commonwealth Bank Building 311 North Arnold Avenue Prestonsburg, KY 41653-0268	James Dean Liebman Liebman & Liebman 403 West Main Street P. O. Box 478 Frankfort, KY 40602-0478
NTCH-West, Inc. Suite E 1970 North Highland Avenue Jackson, TN 38305	Thomas Sams NTCH, Inc. 1600 Ute Avenue, Suite 10 Grand Junction, Colorado 81501
John E. Selent Holly C. Wallace Edward T. Depp Linda Bandy Dinsmore & Shohl, LLP 1400 PNC Plaza 500 West Jefferson Street Louisville, KY 40202 <b>Counsel for West Kentucky, Ballard Rural, South Central, Duo County, Brandenburg Telephone, Foothills Rural, Gearheart Communications, Logan Telephone, Mountain Rural, North Central, Peoples Rural, Thacker- Grigsby</b>  tip.depp@dinslaw.com SELENT@DINSLAW.com HWALLACE@DINSLAW.com	Bhugin M. Modi Vice President ComScape Communications, Inc. 1926 10 <sup>th</sup> Avenue, North Suite 305 West Palm Beach, FL 33461

  
\_\_\_\_\_  
Counsel for Sprint PCS



*AUS Telephone Plant Index*

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1/1/2006





# *AUS Telephone Plant Index*

*Cost Trend Tables from 1946 to January 1, 2006*

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in any form whatsoever. For information  
contact:*

*AUS Consultants  
275 Grandview Ave., Suite 100  
Camp Hill, PA 17011  
717.763.9890*



## *AUS Telephone Plant Index*

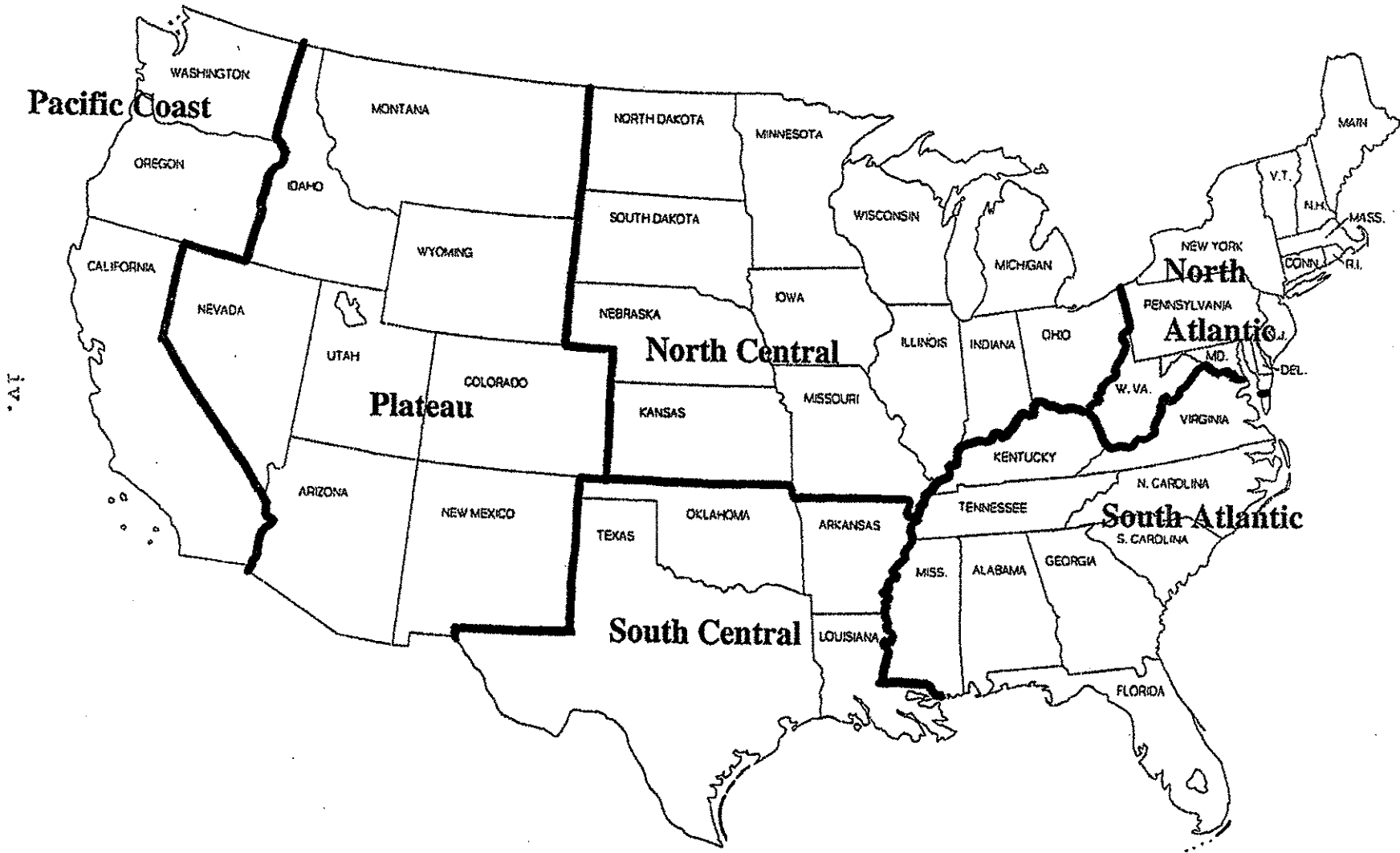
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### AUS Utility Reports

155 Gaither Drive  
P. O. Box 1050  
Moorestown, NJ 08057  
(856) 234 9200

275 Grand View Ave.  
Suite 100  
Camp Hill, PA 17011  
(717) 763 9890

An AUS Consultants Company



# South Atlantic



SCHEDULE No. T-2

AUS TELEPHONE PLANT INDEX  
SOUTH ATLANTIC REGION 1973=100

L I N E  N O	PLANT IN SERVICE DESCRIPTION	F C C  A c c t.	COST INDEX NUMBERS														L I N E  N O
			1979		1980		1981		1982		1983		1984		1985		
			Jan 1	July 1	Jan 1	July 1	Jan 1	July 1	Jan 1	July 1	Jan 1	July 1	Jan 1	July 1	Jan 1	July 1	
1	Total Plant .....		130	135	140	145	145	149	150	151	155	158	155	152	154	156	1
2																	2
3																	3
4	Motor Vehicles .....	2112	149	155	162	167	178	186	195	195	201	199	203	204	206	210	4
5	Aircraft .....	2113	157	163	170	180	195	205	215	217	224	223	227	228	230	234	5
6	Special Purpose Vehicles .....	2114	187	195	206	220	231	245	254	263	266	270	271	274	274	277	6
7	Garage Work Equipment .....	2115	180	189	200	213	223	234	241	248	250	251	253	257	260	263	7
8	Other Work Equipment .....	2116	141	147	153	165	170	181	183	189	189	189	189	190	192	197	8
9																	9
10																	10
11	Buildings .....	2121	157	163	175	179	187	194	189	193	198	199	199	205	214	212	11
12	Furniture .....	2122	160	171	174	182	187	199	210	213	215	222	224	229	232	238	12
13	Office Equipment .....	2123	119	123	125	130	132	136	137	140	140	143	142	142	140	142	13
14	Office Equipment .....	2123	119	123	125	130	132	136	137	140	140	143	142	142	140	142	14
15	General Purpose Computers .....	2124	90	90	90	90	90	90	87	83	76	69	59	48	48	48	15
16																	16
17																	17
18																	18
19																	19
20	Analog Electronic Switching .....	2211	122	125	130	140	149	163	168	175	183	188	193	199	202	204	20
21	Digital Electronic Switching .....	2212	96	96	96	96	97	97	94	90	84	77	67	57	57	57	21
22																	22
23																	23
24	Electro Mechanical Switching .....	2215	151	156	167	188	199	213	219	226	232	248	268	277	282	281	24
25																	25
26	Operator Systems .....	2220	132	136	146	157	166	176	180	185	191	197	204	211	213	215	26
27																	27
28																	28
29																	29
30	Radio Systems - Analog .....	22311	103	103	100	100	101	102	90	91	94	94	79	80	80	81	30
31	Radio Systems - Digital .....	22312	0	0	0	0	0	0	0	0	115	115	115	117	119	121	31
32	Circuit Equipment - Analog .....	22321	120	122	125	130	129	128	130	132	121	154	153	152	153	152	32
33	Circuit Equipment - Digital .....	22322	123	120	114	107	100	93	93	94	95	96	89	82	80	78	33
34																	34
35																	35
36																	36
37	Public Telephone Term Eq .....	2351	122	127	132	140	145	149	157	166	189	195	200	205	209	211	37
38																	38
39																	39
40	Poles .....	2411	193	206	217	229	237	246	251	255	260	264	267	269	274	278	40
41	Aerial Cable - Metallic .....	24211	156	168	180	191	189	195	200	202	206	211	208	206	216	227	41
42	Aerial Cable - Fiber .....	24212	0	0	0	0	0	0	0	0	135	136	131	125	117	109	42
43	Underground Cable - Metallic .....	24221	153	166	179	191	186	190	193	194	197	201	195	190	202	214	43
44	Underground Cable - Fiber .....	24222	0	0	0	0	0	0	0	0	129	130	124	118	109	100	44
45	Buried Cable - Metallic .....	24231	152	166	179	191	185	188	191	192	194	197	191	185	196	210	45
46	Buried Cable - Fiber .....	24232	0	0	0	0	0	0	0	0	128	129	123	117	107	99	46
47	Submarine Cable - Metallic .....	24241	157	168	178	189	190	196	202	205	210	215	214	213	222	232	47
48	Submarine Cable - Fiber .....	24242	0	0	0	0	0	0	0	0	145	147	143	138	132	125	48
49	Intra Building Cable - Metallic .....	24261	156	168	179	191	189	195	200	202	206	211	208	206	216	227	49
50	Intra Building Cable - Fiber .....	24262	0	0	0	0	0	0	0	0	135	137	131	125	117	109	50
51	Aerial Wire .....	2431	154	168	178	188	195	203	207	210	215	221	227	234	237	242	51
52	Conduit Systems .....	2441	165	176	183	191	199	207	215	215	223	234	239	246	250	254	52
53																	53
54																	54
55																	55
56																	56





SCHEDULE No. T-2

AUS TELEPHONE PLANT INDEX  
SOUTH ATLANTIC REGION 1973=100

L I N E  N O	COST INDEX NUMBERS										L I N E  N O
	2005		2006								
	Jan 1	July 1	Jan 1								
1	207	210	223								1
2											2
3											3
4	272	261	265								4
5	408	413	417								5
6	428	445	450								6
7	393	403	408								7
8	276	278	278								8
9											9
10											10
11											11
12	361	367	373								12
13	360	366	373								13
14	158	162	161								14
15	3	3	3								15
16											16
17											17
18											18
19											19
20	190	189	187								20
21	22	22	22								21
22											22
23											23
24	403	405	412								24
25											25
26	271	272	275								26
27											27
28											28
29											29
30	95	95	94								30
31	127	127	128								31
32	145	145	146								32
33	39	39	39								33
34											34
35											35
36											36
37	191	191	188								37
38											38
39											39
40	502	511	508								40
41	383	391	434								41
42	117	119	120								42
43	338	344	397								43
44	94	96	97								44
45	322	328	385								45
46	91	92	93								46
47	387	392	426								47
48	150	152	154								48
49	383	391	433								49
50	117	120	121								50
51	428	436	454								51
52	464	469	474								52
53											53
54											54
55											55





**A SURVEY OF UNBUNDLED  
NETWORK ELEMENT PRICES  
IN THE UNITED STATES**  
(Updated March 2006)

**Billy Jack Gregg**  
Director  
Consumer Advocate Division  
Public Service Commission  
of West Virginia

**UNBUNDLED NETWORK ELEMENT RATE COMPARISON MATRIX**  
All Rates for RBOC in each State Unless Otherwise Noted

Updated March 2006

State Access Lines	Company	Density Zones	Loop Rate (per Month)	Port Rate (per Month)	Switching (per MOU)	Tandem Switching and Transport (per MOU)
Alabama  1,774,375	BS	1	\$12.58	\$1.38	\$0.0007025	\$0.00010 Tandem Switching \$0.0003224 Common Transport
		2	\$21.05			
		3	\$34.34			
		Avg	\$17.60			
Alaska  151,826  37,475	ATU	1	\$18.64	\$4.27	\$0.006595	\$0.004712 Tandem Switching \$0.000416 Termination
	ACS	1	\$19.19	\$1.38	\$0.00203	\$0.00155 Tandem Switching \$0.00023 Common Transport
Arizona  2,365,023	QW	1	\$9.05	\$1.61	\$0.0009695	\$0.000550 Tandem Switching \$0.0008236 Common Transport
		2	\$14.84			
		3	\$36.44			
		Avg	\$12.12			
Arkansas  919,866	SBC	3	\$16.00	\$2.61	\$0.001310 \$0.001690 \$0.002530	\$0.000789 Tandem Switching \$0.000157-\$0.000196 Common Transport
		2	\$18.70			
		1	\$22.02			
		Avg	\$17.21			
California  16,509,867	SBC	1	\$9.48	\$4.29	Included in port rate	\$0.000453 Tandem Switching \$0.001249 Common Transport
		2	\$12.79			
		3	\$26.43			
		Avg	\$11.73			
Colorado  2,468,886	QW	1	\$5.91	\$1.15 w/all features	\$0.00161	\$0.00069 Tandem Switching \$0.00111 Common Transport
		2	\$12.31			
		3	\$32.74			
		Avg	\$15.85			

\*Stand-alone rates. Loop and port combination rates used in UNE-P shown on Table 1A.

Table 1

State Access Lines	Company	Density Zones	Loop Rate (per Month)	Port Rate (per Month)	Switching (per MOU)	Tandem Switching and Transport (per MOU)
Illinois  6,183,446	SBC	A	\$5.17	\$3.18	Included in port rate	\$0.000215 Tandem Switching \$0.000304 Common Transport
		B	\$12.40			
		C	\$14.91			
		Avg	\$13.42			
Indiana  2,143,137	SBC	3	\$12.00	\$4.08	Included in port rate	\$0.000295 Tandem Switching \$0.000513 Common Transport
		2	\$12.50			
		1	\$11.50			
		Avg	\$11.96			
Iowa  985,834	QW	1	\$12.69	\$1.15	\$0.001558	\$0.00069 Tandem Switching \$0.00111 Common Transport
		2	\$15.14			
		3	\$26.39			
		Avg	\$15.94			
Kansas  1,133,026	SBC	3	\$11.86	\$2.61	\$0.00131 \$0.00169 \$0.00253	\$0.000789 Tandem Switching \$0.000157-\$0.000196 Common Transport
		2	\$13.64			
		1	\$23.34			
		Avg	\$13.53			
Kentucky  1,091,285	BS	1	\$10.56	\$1.49	\$0.001197	\$0.0001940 Tandem Switching \$0.0007466 Common Transport
		2	\$15.34			
		3	\$31.11			
		Avg	\$18.04 *			
Louisiana  2,080,847	BS	1	\$12.90	\$1.52	\$0.001868	\$0.0001067 Tandem Switching \$0.0003748 Common Transport
		2	\$23.33			
		3	\$48.43			
		Avg	\$17.30 *			
Maine  662,838	VZ	1	\$11.44	\$0.94	\$0.00168	\$0.001221 Tandem Switching \$0.001940 Day \$0.000322 Eve \$0.00000 Night & Weekend Common Transport
		2	\$13.47			
		3	\$18.75			
		Avg	\$16.18			

\*Stand-alone rates. Loop and port combination rates used in UNE-P shown on Table 1A.

**UNE COMBINATION RATES**  
 Rates Effective When Used As Part of Loop/Port Combination or UNE-P  
 Updated March 2006

State Access Lines	Company	Density Zones	Loop Rate (per Month)	Port Rate (per Month)	Switching (per MOU)	Tandem Switching and Transport (per MOU)	
Alabama  1,774,375	BS	1	\$11.55	\$1.15	\$0.0007025	\$0.00010 Tandem Switching \$0.00032 Common Transport	
		2	\$20.04				
		3	\$33.65				
		Avg	\$16.66				\$3.13 w/ all features
Florida  6,063,101	BS	1	\$9.77	\$1.17	\$0.000766	\$0.0001319 Tandem Switching \$0.0004372 Termination	
		2	\$13.88				
		3	\$24.63				
		Avg	\$13.95				\$3.43 w/ all features
Georgia  3,727,530	BS	1	\$9.56	\$0.9019	\$0.000615	\$0.0000972 Tandem Switching \$0.0001914 Common Transport	
		2	\$14.86				
		3	\$31.66				
		Avg	\$12.82				\$1.68 w/ all features
Kentucky  1,091,285	BS	1	\$9.64	\$1.15	\$0.001197	\$0.000194 Tandem Switching \$0.0007466 Common Transport	
		2	\$14.37				
		3	\$30.59				
		Avg	\$17.26				
Louisiana  2,080,847	BS	1	\$11.77	\$1.36	\$0.001868	\$0.0001067 Tandem Switching \$0.0003748 Common Transport	
		2	\$22.39				
		3	\$48.26				
		Avg	\$16.24				
Mississippi  1,232,062	BS	1	\$10.99	\$1.23	\$0.0010269	\$0.0001723 Tandem Switching \$0.0004541 Common Transport	
		2	\$15.90				
		3	\$25.03				
		4	\$43.68				
		Avg	\$22.37				\$3.79 w/ all features
New York  10,176,986	VZ	1	\$7.70	\$2.57	\$0.001147 Originating \$0.001111 Terminating	\$0.000481 Tandem Switching \$0.000203 Common Transport	
		2	\$11.31				
		3	\$15.51				
		Avg	\$11.49				