Dinsmore & Shohl LLP



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July 13, 2009

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EOWRES DILLER NO SERVICE

VIA FEDERAL EXPRESS

Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Blvd P.O. Box 615 Frankfort, KY 40602-0615

> Re: In the Matter of Complaint of Sprint Communications Company L.P. Against Brandenburg Telephone Company for the Unlawful Imposition of Access

Charges; Case No. 2008-00135.

Dear Mr. Derouen:

I have enclosed for filing in the above-styled cases the original and eleven (11) copies of Brandenburg Telephone Company's supplemental data requests to Sprint Communications Company L.P. Please file-stamp one copy and return it in the also enclosed self-addressed stamped envelope.

Thank you, and if you have any questions, please call us.

Sincerely.

Edward T. Depp

ETD/lb

cc: John N. Hughes, Esq.
Douglas C. Nelson, Esq.
John E. Selent, Esq.
Holly C. Wallace, Esq.

1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202 502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF COMPLAINT)	
OF SPRINT COMMUNICATIONS)	
COMPANY L.P. AGAINST)	Case No. 2008-00135
BRANDENBURG TELEPHONE)	
COMPANY FOR THE UNLAWFUL)	
IMPOSITION OF ACCESS CHARGES)	

SUPPLEMENTAL DATA REQUESTS OF BRANDENBURG TELEPHONE COMPANY

Brandenburg Telephone Company ("Brandenburg Telephone"), by counsel and pursuant to the June 30, 2009 order in this matter, hereby propounds the following supplemental data requests upon Sprint Communications Company L.P. ("Sprint"). These data requests shall be answered in accordance with the Commission's June 30, 2009 order.

- 1. For each month from January 2005 through the present date, and with respect to each RLEC to which Sprint terminates roaming traffic in the state of Indiana, identify the percent interstate usage ("PIU") that Sprint believes applies to that traffic. If a specific PIU is not available, identify an average PIU for that traffic.
- 2. For each month from January 2005 through the present date, and with respect to each RLEC to which Sprint terminates roaming traffic in the state of Ohio, identify the PIU that Sprint believes applies to that traffic. If a specific PIU is not available, identify an average PIU for that traffic.

- 3. For each month from January 2005 through the present date, and with respect to each RLEC to which Sprint terminates roaming traffic in the state of Indiana, identify the terminating intrastate and interstate access rates applicable to that traffic, and further state whether such rate is applicable by tariff or other means. If any rate is not applicable by tariff, please explain the means by which such rate is imposed on Sprint.
- 4. For each month from January 2005 through the present date, and with respect to each RLEC to which Sprint terminates roaming traffic in the state of Ohio, identify the terminating intrastate and interstate access rates applicable to that traffic, and further state whether such rate is applicable by tariff or other means. If any rate is not applicable by tariff, please explain the means by which such rate is imposed on Sprint.
- 5. For each month from January 2005 through the present date, and with respect to each RLEC to which Sprint terminates roaming traffic in the Commonwealth of Kentucky, identify the percentage of Kentucky-originated roaming traffic originated by Sprint wireless customers with NPA-NXX's not associated with a physical Kentucky address. If NPA-NXX's are not available, please answer this question to the best of your ability with respect to non-Kentucky wireless customers roaming in Kentucky and please describe in detail the manner in which you have determined that the calls in question belong to non-Kentucky wireless customers roaming in Kentucky.
- 6. Please explain in detail the manner in which Sprint would jurisdictionalize the following call scenario: a Sprint wireless customer with an 812 area code and a physical address in Indiana

roams into Brandenburg, Kentucky and calls a Brandenburg Telephone wireline customer physically located in Brandenburg, Kentucky (with a telephone number associated with Brandenburg Telephone's local calling area). If there are any possible exceptions to your answer, please identify and describe them in detail.

7. Please explain in detail the manner in which Sprint would jurisdictionalize the following call scenario: a Sprint wireless customer with an 812 area code and a physical address in Indiana roams into Covington, Kentucky and calls a Brandenburg Telephone wireline customer physically located in Brandenburg, Kentucky (with a telephone number associated with Brandenburg Telephone's local calling area). If there are any possible exceptions to your answer, please identify and describe them in detail.

Respectfully submitted,

John E. Selent Edward T. Depp

Holly C. Wallace

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Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was (i) mailed by first-class United States mail, sufficient postage prepaid and (ii) e-mailed this 13th day of July, 2009, to:

John N. Hughes (jnhughes@fewpb.net) Attorney at Law 124 West Todd Street Frankfort, KY 40601

Douglas F. Brent (douglas.brent@skofirm.com) Stoll Keenon Ogden PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, KY 40202

Philip R. Schenkenberg (pschenkenberg@briggs.com) Briggs & Morgan, P.A. 200 IDS Center 80 South 8th St. Minneapolis, MN 55402

Counsel for Sprint Communication Company, L.P.

Counsel to Brandenburg Telephone Company