

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF COMPLAINT)
OF SPRINT COMMUNICATIONS)
COMPANY L.P. AGAINST)
BRANDENBURG TELEPHONE) Case No. 2008-135
COMPANY FOR THE UNLAWFUL)
IMPOSITION OF ACCESS CHARGES)

PREFILED DIRECT TESTIMONY OF ALLISON T. WILLOUGHBY
ON BEHALF OF
BRANDENBURG TELEPHONE COMPANY

July 21, 2009

John E. Selent
Edward T. Depp
Holly C. Wallace
DINSMORE & SHOHL LLP
1400 PNC Plaza
500 West Jefferson St.
Louisville, Kentucky 40202
Tel: (502) 540-2300
Fax: (502) 585-2207

Counsel to Brandenburg Telephone Company

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COMMISSION**

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ON BEHALF OF
BRANDENBURG TELEPHONE COMPANY

1 Q. WHAT IS YOUR NAME?

2 A. My name is Allison T. Willoughby.

3 Q. WHO IS YOUR EMPLOYER?

4 A. My employer is Brandenburg Telephone Company ("Brandenburg Telephone").

5 Q. WHAT IS YOUR POSITION AT BRANDENBURG TELEPHONE?

6 A. I am the Assistant General Manager of Brandenburg Telephone.

7 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PRIOR
8 PROFESSIONAL EXPERIENCE.

9 A. I am a graduate of the University of Kentucky where I received my B.S. in accounting. I am
10 a licensed certified public accountant in the Commonwealth of Kentucky. For the last twenty-two
11 years, I have held various positions with Brandenburg Telephone.

12 Q. WHAT ARE YOUR CURRENT DUTIES AND RESPONSIBILITIES AT
13 BRANDENBURG TELEPHONE?

14 A. As the Assistant General Manager of Brandenburg Telephone, I supervise Brandenburg
15 Telephone's Accounting Department, Regulatory Department, Central Office organization, and other

REDACTED

1 departments. I am responsible for overseeing the technical, financial, and managerial condition of
2 the company. Ultimately, I'm the one that ensures Brandenburg Telephone is able to continue
3 providing the highest quality telecommunications services to its customers, and I answer directly to
4 the Board of Directors.

5 As part of my supervisory role, I am familiar with the full scope of Brandenburg Telephone's
6 operations. For example, through my oversight of the Regulatory Department I have a working
7 knowledge of Brandenburg Telephone's interstate and intrastate tariffs, including how they are
8 applied and how they may be affected by major legal developments. Similarly, through my
9 oversight of the Accounting Department I am familiar with payments made to and received from
10 carriers for various services received and rendered, such as carrier traffic services.

11 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?**

12 A: I am here to request that the Commission take the following actions. First, Brandenburg
13 Telephone requests that the Commission deny Sprint's claim of unlawful imposition of access
14 charges and dismiss Sprint's Complaint in its entirety. Second, Brandenburg Telephone requests that
15 the Commission order Sprint to pay the full outstanding balance of \$ [REDACTED] owed for access
16 traffic. Third, Brandenburg Telephone requests that the Commission permit it to terminate service to
17 Sprint in the event of continued nonpayment.

18 **Q: PLEASE PROVIDE THE COMMISSION WITH SOME BACKGROUND**
19 **REGARDING THIS DISPUTE.**

20 A: Since February 2008, Sprint has refused to pay Brandenburg Telephone for any access
21 services in an attempt to force Brandenburg Telephone to defer to its flawed traffic estimates. When
22 Brandenburg Telephone refused to kowtow to Sprint's demands, Sprint filed its Complaint and
23 falsely claimed that Brandenburg Telephone overcharged for access services. Sprint's withheld

REDACTED

1 payments for undisputed now amount to \$ [REDACTED], and it has no good reason for its refusal to
2 pay.

3 From a technical standpoint, this dispute concerns the manner in which Brandenburg
4 Telephone categorizes -- or "jurisdictionalizes" -- access traffic as either interstate (billed to Sprint at
5 a lower rate pursuant to interstate access tariffs) or intrastate (billed to Sprint at a higher rate
6 pursuant to intrastate access tariffs). For years, Brandenburg Telephone has jurisdictionalized access
7 traffic by comparing the originating and terminating Calling Party Number ("CPN"). CPN has long
8 been recognized as an acceptable proxy for caller location, which is the basis for
9 jurisdictionalization, and Sprint accepted Brandenburg Telephone's use of CPN for years without
10 complaining.

11 In early 2008, after years of silence, Sprint unilaterally decided it would impose a different
12 approach. Sprint first claimed, without any basis, that reliance on CPN inflated the percentage of
13 intrastate access traffic. Then, based on a so-called traffic "study" that fails reliably to distinguish
14 between interstate and intrastate traffic, Sprint demanded that Brandenburg Telephone ignore actual
15 call detail and instead defer to a demonstrably false methodology that works only to Sprint's benefit.
16 When Brandenburg Telephone refused, Sprint attempted to extort an agreement. It stopped all
17 payments to Brandenburg Telephone for all access services, and said it would continue withholding
18 payments until it recovered its alleged overpayments or until Brandenburg Telephone gave in and
19 accepted Sprint's flawed traffic estimates. To this day, Sprint receives access services from
20 Brandenburg Telephone, but it has not made a single payment since February of 2008.

21 Sprint claims the traffic it delivers to Brandenburg Telephone via its access trunks to
22 Brandenburg Telephone includes landline usage, plus wireless traffic delivered by Sprint on behalf
23 of CMRS carriers. Sprint has not disputed how we jurisdictionalize the landline traffic. This dispute

1 is undergirded by an issue that affects providers across the country: the location of mobile callers
2 often cannot be accurately determined. This makes it hard to jurisdictionalize mobile traffic. As I
3 understand it, the FCC is aware of this issue and has opened a docket to find a comprehensive
4 solution (FCC Docket No. 01-92). Until the FCC solves this issue, however, providers are left with
5 a system that is necessarily imperfect. We have to jurisdictionalize as best we can, and Brandenburg
6 Telephone has opted to continue using the most historically sound and objective proxy for caller
7 location.

8 Brandenburg Telephone asks only to be paid for services it has provided and for the
9 Commission to recognize that its jurisdictionalization method is appropriate.

10 **Q: WHAT IS THE METHOD BY WHICH BRANDENBURG TELEPHONE**
11 **DISTINGUISHES BETWEEN INTERSTATE AND INTRASTATE ACCESS TRAFFIC?**

12 A: Brandenburg Telephone is required to jurisdictionalize access traffic whenever it has enough
13 call detail. It does so the same way it has for years: by comparing the originating and terminating
14 CPN. Pursuant to this method, a call is "interstate" when the originating CPN and terminating CPN
15 are assigned to different states. For example, a call from New York's 212 area code to a 502 phone
16 number in Louisville, Kentucky would be rated as "interstate." Conversely, this method would rate
17 calls between numbers assigned to the same state as "intrastate." For example, a call from the 859
18 area code in Covington, Kentucky to the 270 area code in Brandenburg, Kentucky would be rated as
19 intrastate.

20 Brandenburg Telephone is aware of, and uses, customer-provided Percentage of Interstate
21 Use ("PIU") where appropriate. In this case, however, Sprint has never given Brandenburg
22 Telephone a valid PIU. Its traffic estimates apparently assign the interstate jurisdiction to any
23 wireless traffic that is not intraLATA, and therefore cannot reliably distinguish between interstate

1 and intrastate traffic (a necessary characteristic of a PIU). Nevertheless, Brandenburg Telephone has
2 deferred to Sprint's traffic estimates where Brandenburg Telephone is unable to determine
3 jurisdiction from its own records.

4 **Q: HOW DOES SPRINT PROPOSE BRANDENBURG TELEPHONE RESPOND TO**
5 **THE ISSUE OF JURISDICTIONALIZING WIRELESS ACCESS TRAFFIC?**

6 A: Sprint does not dispute the jurisdiction of landline traffic. Sprint disputes only the wireless
7 portion of traffic delivered. Sprint claims, however, that because Brandenburg Telephone cannot
8 determine the geographic location of wireless calls delivered by Sprint, Brandenburg Telephone
9 should simply abandon the use of CPN and defer to Sprint-reported factors for billing all terminating
10 access. Sprint makes the now disproven claim that its traffic factors accurately estimate interstate
11 usage and it has made it clear that it will only pay according to those estimates whether Brandenburg
12 Telephone adopts them or not. The ultimatum was that Brandenburg Telephone would either defer
13 to Sprint's estimates or Sprint would withhold payments.

14 Effectively, Sprint is demanding the use of a different proxy, even though Brandenburg
15 Telephone's use of CPN to jurisdictionalize was apparently acceptable for years. Although Sprint
16 claims its proxy is more accurate, it is not. To be effective, a proxy has to distinguish between
17 interstate and intrastate traffic. Sprint's proxy does not do that. Sprint claims that its proxy ignores
18 CPN and bases its jurisdictionalization of calls on the physical location of the originating user. So,
19 for example, while CPN might incorrectly suggest a call is interstate, Sprint claims it would
20 recognize that call as intrastate and that its factor would more accurately capture and reflect the
21 originating caller's location. To the contrary, Sprint jurisdictionalizes calls from Covington,
22 Kentucky to Brandenburg, Kentucky as "interstate." The bottom line is that Sprint's traffic estimates
23 are verifiably incorrect, apparently because Sprint's estimates measure interLATA use instead of

1 interstate use. When Brandenburg Telephone refused to bill its access traffic based on Sprint's
2 estimates, Sprint stopped paying for any access services.

3 Brandenburg Telephone refused Sprint's demands for a number of reasons. First,
4 Brandenburg Telephone is required to jurisdictionalize by call detail when it can. It cannot just defer
5 to Sprint's traffic estimates. Second, Sprint is wrong to imply that its estimates are so accurate that
6 Brandenburg Telephone is obligated to ignore its own jurisdictionalization any time the parties
7 disagree. Customer-provided numbers are just estimates, and Brandenburg Telephone already
8 jurisdictionalizes its traffic by a more accurate method. The tariffs are clear that customer estimates
9 are a last resort. Third, Sprint's traffic estimates are misleading and inaccurate. They do not even
10 meet the tariffs' most basic definition of a PIU because the methodology confuses states and LATAs
11 and therefore cannot distinguish properly between interstate and intrastate traffic.

12 **Q: WHAT IS YOUR BASIS FOR THIS CLAIM?**

13 A: Two things. First, Sprint admitted it. Second, we double-checked it.

14 In its initial response to Brandenburg Telephone's Data Request No. 3, Sprint admitted it
15 jurisdictionalizes access traffic as "intrastate" only if the call originates and terminates in the same
16 state *and* LATA. In Sprint's own words, it:

17 "compares the MPS fields [originating] LATA and State to the
18 [terminating] LATA and State fields. If those two are equal, the call
19 is marked as intrastate. Otherwise the call is classified as interstate."

20 (emphasis added). This method would cause Sprint to wrongly jurisdictionalize any call that
21 originates in any of Kentucky's seven LATAs and terminates in a different Kentucky LATA as
22 "interstate."

23 As everyone knows, a "state" and a "LATA" are not the same thing. There are seven LATAs
24 in the state of Kentucky, as demonstrated by the LATA map provided on the Commission website

1 (attached as Exhibit F). This map makes it clear that a call from, for example, Covington to
2 Louisville would be an intrastate interLATA call. Yet by Sprint's methodology, this intrastate call,
3 because it is not an intraLATA call, is jurisdictionalized as "interstate" because it originates and
4 terminates in different LATAs.

5 This result is obviously incorrect. Most likely, Sprint's overestimation of the amount of
6 interstate traffic is designed to avoid application of Brandenburg Telephone's tariffed and approved
7 intrastate access rates. (To be fair, Sprint's scheme is probably not directed solely at Brandenburg
8 Telephone, but more likely at rural LECs across the country in an effort to avoid traditionally higher
9 intrastate access rates). Sprint pays less for interstate traffic than it pays for intrastate traffic, and I
10 think they're playing games to get the lower interstate rate at the expense of Brandenburg Telephone.

11 As the dispute stretched on, I became increasingly concerned by Sprint's methodology. It
12 made no sense, and so I had a traffic study done to figure out what Sprint was doing. I was skeptical
13 of Sprint's claims that its traffic estimates were as accurate as they claimed, especially when they
14 told us that 100% of in-bound wireless traffic was interstate. That makes no sense, and could only
15 be true if every relevant wireless customer left the state every single day, making all their Kentucky
16 calls interstate. It would also require us to believe that not one single interstate wireless customer
17 ever roamed into Kentucky and made a single in-state call. The study confirmed what Sprint
18 admitted in its initial response to Data Request No. 3: Sprint systematically jurisdictionalized
19 intrastate interLATA calls as "interstate." In addition, although the study shows several calls in
20 which intrastate traffic was reclassified by Sprint as interstate traffic, it did not find a single instance
21 in which Sprint reclassified interstate traffic to the higher intrastate rate.

22 **Q: PLEASE DESCRIBE HOW THIS STUDY WAS PERFORMED.**

1 A: Two cell phones were used in the study: one with a Kentucky area code (502), and the other
2 with an Indiana area code (812). Calls were then made from various places to verifiable phone
3 numbers located in Brandenburg's operating territory, including Brandenburg Telephone
4 headquarters and Brandenburg Telephone's Radcliff office. Because we were not sure what we
5 would find, the details of these calls, including the caller's physical location, were carefully logged
6 (the logs are attached as Exhibits A and B). Brandenburg Telephone, with its consultants, later
7 compared these logged calls to the phones' bills (attached as Exhibit C) and to records of terminating
8 access traffic for the relevant time period that were provided by Sprint in response to Brandenburg
9 Telephone's data requests (attached as Exhibit D).

10 What we found was despite Sprint's claims to the contrary, every wireless test call we made
11 that was delivered to Brandenburg Telephone by Sprint over its interexchange access trunk from a
12 location within the state that should have been jurisdictionalized as "intrastate" was instead
13 categorized "interstate."

14 Brandenburg Telephone's study was still ongoing when it received Sprint's initial response to
15 Data Request No. 3, in which Sprint admitted that it compared the originating and terminating
16 LATA and State and marked a call as intrastate only "[i]f those two are equal." While I can only
17 surmise that this error in methodology may be one source of the gross errors in Sprint's
18 determination of call jurisdiction, the result is unchanged: the factor demanded by Sprint is wrong.

19 As I have testified, Brandenburg Telephone's traffic study confirmed that Sprint
20 jurisdictionalized calls as interstate where they were made entirely within Kentucky but between
21 different LATAs (see the full analysis, attached as Exhibit E). This traffic can only properly be
22 categorized as intrastate interLATA traffic, yet Sprint categorizes it as interstate and demands to pay
23 the lower interstate rate for it. The following specific calls reinforced this finding:

1

CALLING NO.	DATE OF CALL	TIME OF CALL	NUMBER CALLED	LOCATION OF ORIGINATION	LOCATION OF TERMINATION	ACTUAL JURISDICTION.	SPRINT'S JURISDICTION.
502 802 xxxx	8/20/2008	10:49 a.m.	270 422 xxxx	Covington, KY	Brandenburg, KY	INTRAsate	INTERstate
502 802 xxxx	8/20/2008	10:50 a.m.	270 668 xxxx	Covington, KY	Irvington, KY	INTRAsate	INTERstate
502 802 xxxx	8/20/2008	11:12 a.m.	270 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate
502 802 xxxx	8/20/2008	11:14 a.m.	270 422 xxxx	Covington, KY	Brandenburg, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:37 a.m.	207 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:40 a.m.	207 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:45 a.m.	207 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:45 a.m.	207 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:51 a.m.	270 422 xxxx	Covington, KY	Brandenburg, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	10:54 a.m.	270 668 xxxx	Covington, KY	Irvington, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	11:12 a.m.	270 422 xxxx	Covington, KY	Brandenburg, KY	INTRAsate	INTERstate
812 989 xxxx	8/20/2008	11:27 a.m.	270 351 xxxx	Covington, KY	Radcliff, KY	INTRAsate	INTERstate

2

3 As Sprint admitted in its initial response to Data Request No. 3, and as Brandenburg
4 Telephone confirmed with its traffic study, Sprint's methodology does not properly identify interstate
5 usage. What Sprint mischaracterizes as an estimated Percent of Interstate Use appears to be nothing
6 more than an estimated Percent of InterLATA Use. Sprint's entire Complaint, then, is founded on
7 the argument that Brandenburg Telephone should defer to a purported interstate usage estimate that
8 does not even recognize state lines and always errs in favor of interstate rates.

9 The FCC, Brandenburg Telephone, Sprint, and everyone else know that proxies for wireless
10 caller location are not perfectly accurate. However, when Brandenburg Telephone's proxy is
11 imprecise, it is no more likely to err in favor of one rate or another. Any imprecision is just the
12 natural result of how hard it is to pinpoint wireless callers, and misjurisdictionalized interstate calls
13 are likely to be more or less cancelled out by misjurisdictionalized intrastate calls. In other words,
14 it's a wash, or close to it. In contrast, when Sprint's proxy is imprecise it is the result of intentional
15 gaming and errs in Sprint's favor (and to Brandenburg Telephone's detriment) 100% of the time.
16 This is not just imprecise, this is wrong and dishonest.

1 In fact, Sprint itself seems to have realized its methodology does not give it a legitimate basis
2 for dispute. After the flaws in its methodology were brought to its attention, Sprint filed a
3 "clarification" to its response to Data Request No. 3 that completely contradicts its initial response
4 and attempts to recharacterize its interLATA traffic estimates as interstate traffic estimates.
5 However, by the time this "amended" response was filed Brandenburg Telephone's traffic study had
6 already indicated that Sprint's initial response to Data Request No. 3 was accurate and confirmed that
7 its jurisdictionalization is wrong, regardless of whether Sprint thinks it misspoke as far as the source
8 of the error. As I explained above, every interLATA intrastate call that we placed as part of our
9 study was incorrectly jurisdictionalized by Sprint as "interstate." Put simply, Sprint's initial response
10 to Data Request No. 3 is true and has been double-checked, and its amended response is false.
11 Sprint's answer appears to have changed only after it realized it had admitted that its purported PIU
12 measured interLATA use instead of interstate use. While this "amended" response was a transparent
13 attempt by Sprint to hide the obvious flaws in its reporting methods, it cannot hide the actual results.

14 **Q: SETTING ASIDE FOR THE MOMENT WHETHER SPRINT HAS A LEGITIMATE**
15 **BASIS FOR ITS DISPUTE, HOW DID SPRINT HANDLE THE DISAGREEMENT OVER**
16 **CALL JURISDICTION?**

17 A: At the very beginning of this dispute, Sprint gave Brandenburg Telephone an ultimatum:
18 either defer to Sprint's traffic estimates, which Brandenburg Telephone believed to be flawed, or
19 Sprint would withhold all payments until it recouped all amounts it claimed it was owed. As I
20 testified above, Brandenburg Telephone is obligated to jurisdictionalize by call detail whenever
21 possible. Even setting that aside, Brandenburg Telephone would not defer to a traffic estimate that
22 had the impact of shifting significant amounts of revenue from the state to the interstate jurisdiction
23 solely on the basis of an unsubstantiated and suspect claim. Because of Brandenburg Telephone's

1 refusal to adopt the estimates, Sprint followed through on its threat. It stopped making all payments
2 for all access services, even though it did not claim to dispute the jurisdictionalization of all access
3 traffic.

4 Sprint has not made a single payment for access services since February of 2008. Currently,
5 Sprint owes \$ [REDACTED] for access charges. (Supporting documentation is attached as Exhibit G.)
6 \$ [REDACTED] of this amount is for undisputed and unpaid access charges. The remaining
7 \$ [REDACTED] is for access charges that Sprint disputes the jurisdictionalization of but has improperly
8 left unpaid since the dispute started.

9 **Q: WHAT IS SPRINT'S BASIS FOR WITHHOLDING ALL PAYMENT FOR ACCESS**
10 **TRAFFIC?**

11 A: Sprint states in its pleadings that it will withhold all payments until it recovers every dollar it
12 believes it overpaid. However, these "overpayments" are based on nothing other than Sprint's
13 flawed interLATA traffic estimates. Rather than wait for the Commission to resolve the Complaint
14 which Sprint itself filed, Sprint is engaging in unauthorized self-help by refusing to pay \$ [REDACTED]
15 to Brandenburg Telephone.

16 This is not the only example of Sprint's misconduct during the course of this dispute. Months
17 after the start of these proceedings, when Brandenburg Telephone again refused to adopt Sprint's
18 traffic estimates, Sprint retaliated by threatening to recalculate bills from years ago to inflate the
19 amount it will withhold. The longer this dispute goes on, apparently, the further back Sprint will
20 reach to find alleged overpayments in order to avoid making any payment to Brandenburg
21 Telephone. These additional alleged overpayments are again based on the same flawed interLATA
22 traffic estimates, but they suggest a more problematic trend: the more Sprint withholds as self-help,
23 the more it claims it is owed. In the meantime, Brandenburg Telephone is forced to provide valuable

1 access services to Sprint without any remuneration whatsoever, even for charges Sprint does not
2 dispute owing. This is particularly troubling given the recent press reports of Sprint's precarious
3 financial condition. The tariff does not authorize this sort of self-help. It is nothing short of
4 financial blackmail.

5 **Q: HAS BRANDENBURG TELEPHONE CONTINUED PROVIDING ACCESS**
6 **SERVICES TO SPRINT?**

7 A: By order of the Commission, yes. Brandenburg Telephone is currently providing access
8 services to Sprint and anticipates providing such services to Sprint once this matter is concluded
9 (provided Sprint pays its bills).

10 **Q: WHAT ROLE DO YOU SEE THE COMMISSION HAVING IN THIS ONGOING**
11 **PROVISION OF SERVICES?**

12 A: This dispute requires attention to two distinct questions in order to prevent confusion.
13 First, there is the "looking back" portion of the dispute. Sprint has refused to pay its bills for
14 approximately a year-and-a-half and should be ordered to pay. Second, there is the "looking
15 forward" portion of the dispute. In light of the general issues with jurisdictionalizing wireless traffic,
16 Brandenburg Telephone's historically-approved method of comparing CPN should be accepted in
17 order to avoid any future confusion or unilateral refusals to pay.

18 I believe the "looking back" portion of the dispute is simple. Brandenburg Telephone's
19 pleadings and my testimony above make it clear that Sprint's Complaint has no basis in fact. It is
20 withholding \$ [REDACTED] in retaliation for Brandenburg's refusal to defer to improper traffic
21 estimates, and it should not be allowed to do so. Sprint's entire Complaint is premised on traffic
22 estimates that jurisdictionalize intrastate interLATA calls as "interstate." These same estimates, by
23 no coincidence, err in Sprint's favor 100% of the time. In contrast, Brandenburg Telephone's

1 jurisdictionalization method relies on a well-established proxy that it has used for many years for
2 many providers that favors neither inter- nor intrastate rates.

3 Without question, to the extent Sprint is withholding payment on traffic it does not dispute
4 the jurisdictionalization of, it should be ordered to pay immediately. In addition, I believe
5 Brandenburg Telephone's pleadings and my testimony make it clear that Sprint's claimed issues with
6 Brandenburg Telephone's methods of jurisdictionalization are illegitimate, and should not shield
7 Sprint from payment. I think this Commission should dismiss Sprint's Complaint and order it to pay
8 all outstanding amounts.

9 With respect to the "going forward" portion of the dispute, I understand that the
10 jurisdictionalization of wireless traffic raises substantial questions of law and policy. Providers
11 across the country struggle with the same issues the parties in this case are struggling with. The
12 widespread nature of this issue is precisely why the FCC has opened a docket to find a
13 comprehensive solution (FCC Docket No. 01-92).

14 In light of the fact that there are ongoing FCC proceedings addressing this exact issue, it does
15 not seem sensible for the Commission to approve Sprint's unilateral attempt to impose its flawed
16 traffic estimates on Brandenburg Telephone, especially when it will create significant complications
17 with the non-traffic sensitive revenue component of Brandenburg Telephone's intrastate access
18 charges. As discussed in Brandenburg Telephone's pleadings, Sprint's claims could result in a
19 prospective and retrospective increase in the intrastate charges for every interexchange carrier
20 terminating calls to Brandenburg Telephone's network. It is difficult to overstate the confusion this
21 would cause or the costs it would entail. In addition, the widespread nature of this
22 jurisdictionalization issue makes it ill-suited to be resolved on an *ad hoc* basis.

1 This Commission should therefore not introduce new methods or standards for determining
2 call jurisdiction based on this two-party dispute. The more prudent course of action would be to
3 order Brandenburg Telephone to continue jurisdictionalizing calls the same way it has done for years
4 and to order Sprint to pay for access traffic based on Brandenburg Telephone's determination of call
5 jurisdiction. The Commission must decide between two methods: one that results in verifiably
6 incorrect traffic estimates and always favors lower interstate rates, or one that is mutually verifiable
7 and not subject to manipulation in favor of interstate rates.

8 **Q: WOULD YOU PLEASE SUMMARIZE THE ACTIONS YOU REQUEST THE**
9 **COMMISSION TAKE?**

10 A: Certainly.

11 First, Brandenburg Telephone requests that the Commission deny Sprint's claim of unlawful
12 imposition of access charges and dismiss its Complaint in its entirety.

13 Second, Brandenburg Telephone requests that the Commission order Sprint to pay the full
14 outstanding balance owed for all access traffic.

15 Third, Brandenburg Telephone requests that the Commission permit it to terminate service to
16 Sprint in the event of continued nonpayment.

17 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 A. Yes.

CERTIFICATE OF SERVICE

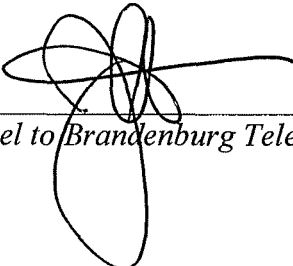
I hereby certify a true and accurate copy of the foregoing was served on the following, via first-class U.S. Mail, on this 21st day of July, 2009.

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 Communications Company L.P.



Counsel to Brandenburg Telephone Company

1669395v5

REDACTED

Calls made from Sprint Cell Phone No. 502-802- [REDACTED]

Date of Call	Time of call	Number called	Location of call	Duration of call
August 17, 2008	1:16 p.m.	270-668-[REDACTED]	New Salisbury, IN	1 minute
August 17, 2008	1:23 p.m.	270-422-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	1:29 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	1:35 p.m.	270-422-[REDACTED]	Corydon, IN	2 minutes
August 17, 2008	2:02 p.m.	270-668-[REDACTED]	Brandenburg, KY	1 minute
August 17, 2008	2:03 p.m.	270-668-[REDACTED]	Brandenburg, KY	1 minute
August 17, 2008	2:04 p.m.	270-547-[REDACTED]	Brandenburg, KY	1 minute
August 17, 2008	2:09 p.m.	270-422-[REDACTED]	Bridge from Brandenburg, KY into Mauckport, IN	1 minute
August 17, 2008	2:12 p.m.	270-668-[REDACTED]	Bridge from Mauckport, IN into Brandenburg, KY	1 minute
August 17, 2008	2:16 p.m.	270-422-[REDACTED]	Brandenburg, KY	2 minutes
August 17, 2008	2:49 p.m.	270-547-[REDACTED]	Bridge from Brandenburg, KY into Mauckport, IN	1 minute
August 17, 2008	3:06 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	4:54 p.m.	270-668-[REDACTED]	Louisville, KY	2 minutes
August 18, 2008	3:57 p.m.	270-668-[REDACTED]	Louisville, KY	1 minute
August 18, 2008	4:01 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 18, 2008	4:02 p.m.	270-351-[REDACTED]	Louisville, KY	2 minutes
August 18, 2008	4:07 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 18, 2008	4:09 p.m.	270-547-[REDACTED]	Louisville, KY	1 minute
August 18, 2008	4:13 p.m.	270-668-[REDACTED]	Louisville, KY	1 minute
August 18, 2008	4:18 p.m.	270-668-[REDACTED]	New Albany, IN	1 minute
August 18, 2008	4:32 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 18, 2008	5:24 p.m.	270-422-[REDACTED]	Corydon, IN	2 minutes
August 18, 2008	5:26 p.m.	270-422-[REDACTED]	Corydon, IN	1 minute
August 18, 2008	5:27 p.m.	270-547-[REDACTED]	Corydon, IN	1 minute
August 18, 2008	5:28 p.m.	270-422-[REDACTED]	Corydon, IN	1 minute
August 19, 2008	2:31 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	2:33 p.m.	270-351-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	2:37 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	8:02 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:03 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:05 p.m.	270-668-[REDACTED]	Palmyra, IN	1 minute

REDACTED

August 19, 2008	8:06 p.m.	270-668-	Palmyra, IN	1 minute
August 19, 2008	8:09 p.m.	270-351-	Palmyra, IN	1 minute
August 19, 2008	8:11 p.m.	270-547-	Palmyra, IN	1 minute
August 20, 2008	10:49 a.m.	270-422-	Covington, KY	1 minute
August 20, 2008	10:50 a.m.	270-668-	Covington, KY	1 minute
August 20, 2008	11:12 a.m.	270-351-	Covington, KY	2 minutes
August 20, 2008	11:14 a.m.	270-422-	Covington, KY	1 minute
August 20, 2008	3:16 p.m.	270-668-	Louisville, KY	1 minute
August 20, 2008	3:18 p.m.	270-351-	Louisville, KY	1 minute
August 20, 2008	3:19 p.m.	270-422-	Louisville, KY	1 minute
August 20, 2008	3:20 p.m.	270-547-	Louisville, KY	1 minute
August 20, 2008	3:22 p.m.	270-668-	Louisville, KY	1 minute
August 20, 2008	3:23 p.m.	270-422-	Louisville, KY	1 minute
August 20, 2008	8:31 p.m.	270-547-	Palmyra, IN	1 minute
August 20, 2008	8:32 p.m.	270-422-	Palmyra, IN	2 minutes
August 20, 2008	8:33 p.m.	270-422-	Palmyra, IN	1 minute
August 20, 2008	8:34 pm.	270-668-	Palmyra, IN	1 minute
August 20, 2008	8:35 p.m.	270-351-	Palmyra, IN	1 minute
August 20, 2008	8:36 p.m.	270-668-	Palmyra, IN	1 minute
August 21, 2008	12:45 p.m.	270-422-	Louisville, KY	1 minute
August 21, 2008	12:46 p.m.	270-422-	Louisville, KY	1 minute
August 21, 2008	12:47 p.m.	270-547-	Louisville, KY	1 minute
August 21, 2008	12:49 p.m.	270-351-	Louisville, KY	2 minutes
August 21, 2008	12:50 p.m.	270-668-	Louisville, KY	1 minute
August 21, 2008	12:51 p.m.	270-668-	Louisville, KY	1 minute
August 21, 2008	8:58 p.m.	270-547-	Palmyra, IN	1 minute
August 21, 2008	8:59 p.m.	270-668-	Palmyra, IN	1 minute
August 21, 2008	9:00 p.m.	270-668-	Palmyra, IN	1 minute
August 21, 2008	9:02 p.m.	270-422-	Palmyra, IN	1 minute
August 21, 2008	9:03 p.m.	270-422-	Palmyra, IN	1 minute
August 22, 2008	1:01 p.m.	270-422-	Louisville, KY	1 minute
August 22, 2008	1:02 p.m.	270-351-	Louisville, KY	1 minute
August 22, 2008	1:03 p.m.	270-668-	Louisville, KY	1 minute
August 22, 2008	1:04 p.m.	270-422-	Louisville, KY	1 minute
August 22, 2008	1:06 p.m.	270-547-	Louisville, KY	1 minute
August 22, 2008	1:07 p.m.	270-668-	Louisville, KY	1 minute
August 22, 2008	8:44 p.m.	270-547-	Palmyra, IN	1 minute
August 22, 2008	8:45 p.m.	270-668-	Palmyra, IN	1 minute
August 22, 2008	8:46 p.m.	270-422-	Palmyra, IN	1 minute
August 22, 2008	8:49 p.m.	270-668-	Palmyra, IN	1 minute
August 22, 2008	8:50 p.m.	270-422-	Palmyra, IN	1 minute
August 23, 2008	3:23 p.m.	270-668-	Corydon, IN	1 minute
August 23, 2008	3:24 p.m.	270-422-	Corydon, IN	1 minute
August 23, 2008	3:26 p.m.	270-668-	Corydon, IN	1 minute
August 23, 2008	3:28 p.m.	270-351-	Corydon, IN	1 minute

REDACTED

Calls made from Sprint Cell Phone No. 812-989-[REDACTED]

Date of Call	Time of call	Number called	Location of call	Duration of call
August 17, 2008	1:38 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	1:40 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	1:51 p.m.	270-422-[REDACTED]	Mauckport, IN	1 minute
August 17, 2008	1:53 p.m.	270-422-[REDACTED]	Bridge from Mauckport, IN into Brandenburg, KY	1 minute
August 17, 2008	1:58 p.m.	270-547-[REDACTED]	Brandenburg, KY	1 minute
August 17, 2008	1:59 p.m.	270-351-[REDACTED]	Brandenburg, KY	1 minute
August 17, 2008	3:07 p.m.	270-422-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	3:08 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 17, 2008	7:23 p.m.	270-668-[REDACTED]	Elizabethtown, KY	1 minute
August 17, 2008	7:25 p.m.	270-668-[REDACTED]	Elizabethtown, KY	1 minute
August 17, 2008	7:26 p.m.	270-422-[REDACTED]	Elizabethtown, KY	1 minute
August 17, 2008	8:21 p.m.	270-668-[REDACTED]	Bridge from Louisville, KY into New Albany, IN	1 minute
August 18, 2008	4:57 p.m.	270-422-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	4:58 p.m.	270-351-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	4:59 p.m.	270-422-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	5:01 p.m.	270-547-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	5:03 p.m.	270-668-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	5:05 p.m.	270-668-[REDACTED]	Brandenburg, KY	1 minute
August 18, 2008	5:32 p.m.	270-668-[REDACTED]	Corydon, IN	1 minute
August 18, 2008	7:15 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 18, 2008	7:16 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 18, 2008	7:49 p.m.	270-547-[REDACTED]	Palmyra, IN	1 minute
August 18, 2008	7:50 p.m.	270-351-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	12:29 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	12:32 p.m.	270-351-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	12:34 p.m.	270-422-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	12:37 p.m.	270-668-[REDACTED]	Louisville, KY	1 minute
August 19, 2008	8:13 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:14 p.m.	270-351-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:15 p.m.	270-668-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:17 p.m.	270-422-[REDACTED]	Palmyra, IN	1 minute
August 19, 2008	8:19 p.m.	270-547-[REDACTED]	Palmyra, IN	1 minute

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August 19, 2008	8:21 p.m.	270-668-	Palmyra, IN	1 minute
August 19, 2008	8:29 p.m.	270-669-	Palmyra, IN	1 minute
August 20, 2008	10:37 a.m.	270-351-	Covington, KY	1 minute
August 20, 2008	10:40 a.m.	270-351-	Covington, KY	1 minute
August 20, 2008	10:45 a.m.	270-351-	Covington, KY	1 minute
August 20, 2008	10:45 a.m.	270-351-	Covington, KY	1 minute
August 20, 2008	10:51 a.m.	270-422-	Covington, KY	1 minute
August 20, 2008	10:54 a.m.	270-668-	Covington, KY	1 minute
August 20, 2008	11:12 a.m.	270-422-	Covington, KY	1 minute
August 20, 2008	11:27 a.m.	270-351-	Covington, KY	1 minute
August 20, 2008	3:24 p.m.	270-351-	Louisville, KY	1 minute
August 20, 2008	3:25 p.m.	270-422-	Louisville, KY	1 minute
August 20, 2008	3:26 p.m.	270-668-	Louisville, KY	1 minute
August 20, 2008	3:27 p.m.	270-547-	Louisville, KY	1 minute
August 20, 2008	3:28 p.m.	270-668-	Louisville, KY	1 minute
August 20, 2008	3:29 p.m.	270-422-	Louisville, KY	1 minute
August 20, 2008	3:30 p.m.	270-668-	Louisville, KY	1 minute
August 20, 2008	8:37 p.m.	270-422-	Palmyra, IN	1 minute
August 20, 2008	8:38 p.m.	270-422-	Palmyra, IN	1 minute
August 20, 2008	8:39 p.m.	270-668-	Palmyra, IN	1 minute
August 20, 2008	8:42 p.m.	270-547-	Palmyra, IN	1 minute
August 20, 2008	8:43 p.m.	270-351-	Palmyra, IN	1 minute
August 20, 2008	8:44 p.m.	270-668-	Palmyra, IN	1 minute
August 21, 2008	11:51 a.m.	270-351-	Louisville, KY	1 minute
August 21, 2008	11:52 a.m.	270-422-	Louisville, KY	1 minute
August 21, 2008	11:53 a.m.	270-422-	Louisville, KY	1 minute
August 21, 2008	11:54 a.m.	270-668-	Louisville, KY	1 minute
August 21, 2008	11:56 a.m.	270-547-	Louisville, KY	1 minute
August 21, 2008	11:57 a.m.	270-668-	Louisville, KY	1 minute
August 21, 2008	9:04 p.m.	270-547-	Palmyra, IN	1 minute
August 21, 2008	9:05 p.m.	270-422-	Palmyra, IN	1 minute
August 21, 2008	9:06 p.m.	270-668-	Palmyra, IN	2 minutes
August 21, 2008	9:07 p.m.	270-422-	Palmyra, IN	1 minute
August 22, 2008	12:01 p.m.	270-422-	Louisville, KY	1 minute
August 22, 2008	12:02 p.m.	270-351-	Louisville, KY	1 minute
August 22, 2008	12:03 p.m.	270-668-	Louisville, KY	1 minute
August 22, 2008	12:04 p.m.	270-422-	Louisville, KY	1 minute
August 22, 2008	12:05 p.m.	270-668-	Louisville, KY	1 minute
August 22, 2008	12:06 p.m.	270-547-	Louisville, KY	1 minute
August 22, 2008	12:07 p.m.	270-668-	Louisville, KY	1 minute
August 22, 2008	8:47 p.m.	270-668-	Palmyra, IN	1 minute
August 22, 2008	8:48 p.m.	270-547-	Palmyra, IN	1 minute
August 22, 2008	8:51 p.m.	270-668-	Palmyra, IN	1 minute
August 22, 2008	8:52 p.m.	270-422-	Palmyra, IN	1 minute
August 22, 2008	8:53 p.m.	270-351-	Palmyra, IN	1 minute



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Call details

(502) 802- (Continued)

Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
470						
471						
472						
473						
474						
475						
476						
477						
478						
479						
480						
481						
482						
483						
484						
485						
486						
487						
488						
489						
490						
491						
492						
493						
494						
495						
496						
497	08/17 01:15 PM	270-668-	IRVINGTON,KY	NW/PU	1	
498						
499						
500	08/17 01:21 PM	270-422-	BRANDENBG,KY	NW/PU	1	
501						
502						
503	08/17 01:28 PM	270-668-	IRVINGTON,KY	NW/PU	2	
504	08/17 01:30 PM	270-668-	Incoming	NW/PU	3	
505	08/17 01:34 PM	270-422-	BRANDENBG,KY	NW/PU	2	
506						
507						
508						
509						
510						
511						

MM - Sprint Mobile to Mobile PU - Plan/Promotional Usage NW - Night and Weekends CW - Call Waiting

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Customer Account Number Bill Period Bill Date
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Call details

(502) 802- (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
512							
513	08/17	04:53 PM	270-668	IRVINGTON,KY	NW/PU	2	
514							
515							
516							
517							
518							
519							
520							
521							
522							
523							
524							
525							
526							
527							
528							
529							
530							
531							
532							
533							
534	08/18	09:36 AM	270-351	RADCLIFF,KY	PU	1	
535	08/18	09:36 AM	270-351	RADCLIFF,KY	PU	2	
536	08/18	10:13 AM	270-668	IRVINGTON,KY	PU	1	
537							
538							
539	08/18	10:19 AM	270-472	BRANDENBG,KY	PU	1	
540							
541							
542							
543							
544							
545	08/18	10:38 AM	270-351	RADCLIFF,KY	PU	2	
546							
547							
548							
549	08/18	11:01 AM	270-351	RADCLIFF,KY	PU	2	
550	08/18	11:03 AM	270-351	RADCLIFF,KY	PU	1	
551							
552	08/18	03:55 PM	270-668	IRVINGTON,KY	PU	2	
553	08/18	04:00 PM	270-472	BRANDENBG,KY	PU	1	

NW - Night and Weekends PU - Plan/Promotional Usage MM - Sprint Mobile to Mobile

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Customer Account Number Bill Period Bill Date
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Call details

(Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
554	08/18	04:01 PM	270-351	RADCLIFF,KY	PU	2	
556	08/18	04:05 PM	270-422	BRANDENBG,KY	PU	1	
557	08/18	04:08 PM	270-547	IRVINGTON,KY	PU	1	
558							
559	08/18	04:12 PM	270-668	IRVINGTON,KY	PU	1	
560	08/18	04:17 PM	270-668	IRVINGTON,KY	AM/PU	1	
561							
562							
563	08/18	04:31 PM	270-668	IRVINGTON,KY	PU	2	
564							
565							
566							
567							
568							
569	08/18	05:23 PM	270-422	BRANDENBG,KY	PU	2	
570	08/18	05:25 PM	270-422	BRANDENBG,KY	PU	1	
571	08/18	05:27 PM	270-547	IRVINGTON,KY	PU	1	
572	08/18	05:28 PM	270-668	IRVINGTON,KY	PU	1	15
573							
574							
575							
576							
577							
578							
579							
580							
581							
582							
583							
584							
585							
586							
587							
588							
589							
590							
591							
592							
593							
594	08/19	02:31 PM	270-422	BRANDENBG,KY	PU	1	
595	08/19	02:32 PM	270-351	RADCLIFF,KY	PU	1	

PU - Plan/Promotional Usage MM - Sprint Mobile to Mobile AM - Off Network - Included in America Plan NW - Night and Weekends

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REDACTED



Customer Account Number Bill Period Bill Date
Jul 25-Aug 24 Aug 28, 2008

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Call details

(502) 802 (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
596	08/19	02:36 PM	270-422	BRANDENBG,KY	PU	1	
597							
598							
599							
600							
601							
602							
603							
604							
605							
606							
607							
608	08/19	08:01 PM	270-422	BRANDENBG,KY	NW/PU	1	
609	08/19	08:02 PM	270-422	BRANDENBG,KY	NW/PU	1	
610	08/19	08:04 PM	270-668	IRVINGTON,KY	NW/PU	2	
611	08/19	08:05 PM	270-668	IRVINGTON,KY	NW/PU	1	
612	08/19	08:07 PM	270-351	RADCLIFF,KY	NW/PU	1	
613	08/19	08:10 PM	270-547	IRVINGTON,KY	NW/PU	1	
614							
615							
616							
617							
618	08/20	08:26 AM	270-422	BRANDENBG,KY	PU	2	
619	08/20	08:27 AM	270-668	IRVINGTON,KY	PU	1	
620							
621	08/20	08:27 AM	270-422	BRANDENBG,KY	PU	7	
622	08/20	08:54 AM	270-422	BRANDENBG,KY	PU	3	
623							
624							
625							
626							
627							
628							
629							
630							
631							
632							
633							
634							
635							
636							
637	08/20	10:41 AM	270-351	RADCLIFF,KY	PU	2	

PU - Plan/Promotional Usage CW - Call Waiting MM - Sprint Mobile to Mobile NW - Night and Weekends

Covington calls

REDACTED



Customer Account Number Bill Period Bill Date
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Call details

(502) 802- (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
639	08/20	10:48 AM	270-422-	BRANDENBG,KY	PU	1	
640	08/20	10:49 AM	270-668-	IRVINGTON,KY	PU	1	
642	08/20	10:56 AM	270-422-	BRANDENBG,KY	PU	1	
643	08/20	11:10 AM	270-351-	RADCLIFF,KY	PU	2	
644	08/20	11:12 AM	270-422-	BRANDENBG,KY	PU	1	
645	08/20	11:13 AM	270-668-	IRVINGTON,KY	PU	1	
651	08/20	12:44 PM	270-668-	IRVINGTON,KY	PU	1	
652	08/20	03:15 PM	270-668-	IRVINGTON,KY	PU	1	
654	08/20	03:17 PM	270-351-	RADCLIFF,KY	PU	1	
655	08/20	03:18 PM	270-422-	BRANDENBG,KY	PU	1	
656	08/20	03:19 PM	270-547-	IRVINGTON,KY	PU	1	
657	08/20	03:21 PM	270-668-	IRVINGTON,KY	PU	1	
658	08/20	03:22 PM	270-422-	BRANDENBG,KY	PU	1	
669	08/20	08:30 PM	270-547-	IRVINGTON,KY	NW/PU	1	
670	08/20	08:31 PM	270-422-	BRANDENBG,KY	NW/PU	2	
671	08/20	08:32 PM	270-422-	BRANDENBG,KY	NW/PU	1	
672	08/20	08:34 PM	270-668-	IRVINGTON,KY	NW/PU	1	
673	08/20	08:35 PM	270-351-	RADCLIFF,KY	NW/PU	1	
674	08/20	08:35 PM	270-668-	IRVINGTON,KY	NW/PU	2	
679	08/21	12:44 PM	270-422-	BRANDENBG,KY	PU	1	

Irvington Calls

PU - Plan/Promotional Usage AM - Off Network - Included in America Plan MM - Sprint Mobile to Mobile NW - Night and Weekends



Customer Account Number

Bill Period Jul 25-Aug 24
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Call details

(502) 802 (Continued)

Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
722						
723						
724						
725						
726						
727						
728						
729						
730						
731						
732						
733						
734						
735						
736						
737						
738						
739						
740						
741						
742						
743						
744						
745						
746	08/22	08:42 PM	270-547-IRVINGTON,KY	NW/PU	1	
747	08/22	08:43 PM	270-668-IRVINGTON,KY	NW/PU	1	
748	08/22	08:44 PM	270-422-BRANDENBG,KY	NW/PU	1	
749	08/22	08:48 PM	270-668-IRVINGTON,KY	NW/PU	1	
750	08/22	08:49 PM	270-422-BRANDENBG,KY	NW/PU	1	
751						
752						
753						
754						
755						
756						
757						
758						
759						
760						
761						
762	08/23	03:21 PM	270-668-IRVINGTON,KY	NW/PU	1	
763	08/23	03:22 PM	270-422-BRANDENBG,KY	NW/PU	1	

PU - Plan/Promotional Usage MM - Sprint Mobile to Mobile CW - Call Waiting NW - Night and Weekends



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 Jul 25 - Aug 24 Aug 28, 2008

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Call details

(502) 802- (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
764	08/23	03:24 PM	270-668	IRVINGTON, KY	NW/PU	1	
765	08/23	03:26 PM	270-351	RADCLIFF, KY	NW/PU	1	
766	08/23	03:27 PM	270-351	RADCLIFF, KY	NW/PU	1	
768	08/23	03:35 PM	270-547	IRVINGTON, KY	NW/PU	1	
769	08/23	03:36 PM	270-668	IRVINGTON, KY	NW/PU	1	
770							
771							
772							
773							
774							
775							
776							
777							
778							
779							
780							
781							
782							
783							
784							
785							
786							
787							
788							
789							
790							

NW - Night and Weekends PU - Plan/Promotional Usage MM - Sprint Mobile to Mobile



Customer Account Number Bill Period Bill Date
Jul 25-Aug 24 Aug 28, 2008

Call details

(502) 794- (Continued)

Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
39						
40						

MM - Sprint Mobile to Mobile PU - Plan/Promotional Usage

(812) 989

Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
1	08/17 01:37 PM	270-668	IRVINGTON,KY	NW/PU	2	
2	08/17 01:39 PM	270-668	IRVINGTON,KY	NW/PU	1	
3	08/17 03:06 PM	270-422	BRANDENBG,KY	NW/PU	1	
4	08/17 03:07 PM	270-668	IRVINGTON,KY	NW/PU	1	
5	08/17 07:23 PM	270-668	IRVINGTON,KY	NW/PU	1	
6	08/17 07:24 PM	270-668	IRVINGTON,KY	NW/PU	1	
7	08/17 07:26 PM	270-422	BRANDENBG,KY	NW/PU	1	
8						
9	08/17 08:21 PM	270-668	IRVINGTON,KY	NW/PU	1	
10	08/18 09:32 AM	270-351	RADCLIFF,KY	PU	3	
11	08/18 09:35 AM	270-422	BRANDENBG,KY	PU	1	
12	08/18 10:18 AM	270-351	RADCLIFF,KY	PU	2	
13	08/18 10:39 AM	270-351	RADCLIFF,KY	PU	2	
14	08/18 11:04 AM	270-351	RADCLIFF,KY	PU	1	
15	08/18 05:32 PM	270-668	IRVINGTON,KY	PU	2	
16	08/18 07:15 PM	270-422	BRANDENBG,KY	NW/PU	1	
17	08/18 07:16 PM	270-422	BRANDENBG,KY	NW/PU	1	
18	08/18 07:48 PM	270-547	IRVINGTON,KY	NW/PU	1	
19	08/18 07:50 PM	270-351	RADCLIFF,KY	NW/PU	1	
20	08/19 12:29 PM	270-422	BRANDENBG,KY	PU	1	
21	08/19 12:32 PM	270-351	RADCLIFF,KY	PU	1	
22	08/19 12:34 PM	270-422	BRANDENBG,KY	PU	1	
23	08/19 12:38 PM	270-668	IRVINGTON,KY	PU	1	
24	08/19 08:13 PM	270-422	BRANDENBG,KY	NW/PU	1	
25	08/19 08:14 PM	270-351	RADCLIFF,KY	NW/PU	1	
26	08/19 08:15 PM	270-668	IRVINGTON,KY	NW/PU	1	
27	08/19 08:17 PM	270-422	BRANDENBG,KY	NW/PU	1	
28	08/19 08:19 PM	270-547	IRVINGTON,KY	NW/PU	1	
29	08/19 08:21 PM	270-668	IRVINGTON,KY	NW/PU	1	

NW - Night and Weekends PU - Plan/Promotional Usage MM - Sprint Mobile to Mobile

REDACTED



Customer Account Number Bill Period Bill Date
Jul 25-Aug 24 Aug 28, 2008

A3 of 4

Call details

(812) 989- (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
30	08/19	08:29 PM	270-668	IRVINGTON,KY	NW/PU	1	
31	08/20	10:36 AM	270-668	IRVINGTON,KY	PU	7	
32	08/20	10:37 AM	270-351	RADCLIFF,KY	PU	3	
33	08/20	10:39 AM	270-422	Incoming	CW/PU	1	
34	08/20	10:40 AM	270-351	RADCLIFF,KY	PU	2	
35	08/20	10:45 AM	270-351	RADCLIFF,KY	PU	1	
36	08/20	10:45 AM	270-351	RADCLIFF,KY	PU	2	
37	08/20	10:51 AM	270-422	BRANDENBG,KY	PU	1	
38	08/20	10:52 AM	270-668	IRVINGTON,KY	PU	1	
39	08/20	10:53 AM	270-668	IRVINGTON,KY	PU	1	
40	08/20	11:12 AM	270-422	BRANDENBG,KY	PU	1	
41	08/20	11:26 AM	270-668	Incoming	PU	1	
42	08/20	11:27 AM	270-351	RADCLIFF,KY	PU	2	
43	08/20	11:29 AM	270-668	IRVINGTON,KY	PU	1	
44	08/20	03:24 PM	270-351	RADCLIFF,KY	PU	1	
45	08/20	03:25 PM	270-422	BRANDENBG,KY	PU	1	
46	08/20	03:26 PM	270-668	IRVINGTON,KY	PU	1	
47	08/20	03:27 PM	270-547	IRVINGTON,KY	PU	1	
48	08/20	03:28 PM	270-668	IRVINGTON,KY	PU	1	
49	08/20	03:29 PM	270-422	BRANDENBG,KY	PU	1	
50	08/20	03:30 PM	270-668	IRVINGTON,KY	PU	1	
51	08/20	08:37 PM	270-422	BRANDENBG,KY	NW/PU	1	
52	08/20	08:38 PM	270-422	BRANDENBG,KY	NW/PU	1	
53	08/20	08:39 PM	270-668	IRVINGTON,KY	NW/PU	1	
54	08/20	08:42 PM	270-547	IRVINGTON,KY	NW/PU	1	
55	08/20	08:43 PM	270-351	RADCLIFF,KY	NW/PU	1	
56	08/20	08:44 PM	270-668	IRVINGTON,KY	NW/PU	1	
57							
58	08/21	11:51 AM	270-351	RADCLIFF,KY	PU	1	
59	08/21	11:52 AM	270-422	BRANDENBG,KY	PU	1	
60	08/21	11:53 AM	270-422	BRANDENBG,KY	PU	1	
61	08/21	11:54 AM	270-668	IRVINGTON,KY	PU	2	
62	08/21	11:56 AM	270-547	IRVINGTON,KY	PU	1	
63	08/21	11:57 AM	270-668	IRVINGTON,KY	PU	1	
64	08/21	09:04 PM	270-547	IRVINGTON,KY	NW/PU	1	
65	08/21	09:05 PM	270-422	BRANDENBG,KY	NW/PU	1	
66	08/21	09:06 PM	270-668	IRVINGTON,KY	NW/PU	2	
67	08/21	09:07 PM	270-422	BRANDENBG,KY	NW/PU	1	
68	08/22	12:00 PM	270-422	BRANDENBG,KY	PU	1	
69	08/22	12:02 PM	270-351	RADCLIFF,KY	PU	1	
70	08/22	12:03 PM	270-668	IRVINGTON,KY	PU	1	
71	08/22	12:04 PM	270-422	BRANDENBG,KY	PU	1	

calls made from Covington

NW - Night and Weekends PU - Plan/Promotional Usage CW - Call Waiting

REDACTED

REDACTED



Customer Account Number Bill Period Bill Date
Jul 25-Aug 24 Aug 28, 2008

A4 of 4

Call details

(812) 989 (Continued)

	Date	Time	Phone Number	Call Destination	Rate Type	Minutes Used	Total Charges
72	08/22	12:05 PM	270-668	IRVINGTON,KY	PU	1	
73	08/22	12:06 PM	270-547	IRVINGTON,KY	PU	1	
74	08/22	12:07 PM	270-668	IRVINGTON,KY	PU	1	
75	08/22	08:47 PM	270-668	IRVINGTON,KY	NW/PU	1	
76	08/22	08:47 PM	270-547	IRVINGTON,KY	NW/PU	1	
77	08/22	08:51 PM	270-668	IRVINGTON,KY	NW/PU	1	
78	08/22	08:52 PM	270-422	BRANDENBG,KY	NW/PU	1	
79	08/22	08:53 PM	270-351	RADCLIFF,KY	NW/PU	1	
80	08/22	08:55 PM	270-668	IRVINGTON,KY	NW/PU	1	
81	08/23	03:29 PM	270-668	IRVINGTON,KY	NW/PU	1	
82	08/23	03:30 PM	270-422	BRANDENBG,KY	NW/PU	1	
83	08/23	03:31 PM	270-668	IRVINGTON,KY	NW/PU	1	
84	08/23	03:32 PM	270-422	BRANDENBG,KY	NW/PU	1	
85	08/23	03:33 PM	270-547	IRVINGTON,KY	NW/PU	1	
86	08/23	03:34 PM	270-668	IRVINGTON,KY	NW/PU	1	
87	08/23	03:35 PM	270-351	RADCLIFF,KY	NW/PU	1	
88							

PU - Plan/Promotional Usage NW - Night and Weekends

REDACTED

REDACTED

Calling No.	Bill Item Number	Date of Call	Log Time of Call	Number called	Location of call	Actual Jurisdiction	Sprint Jurisdiction	Delivery Method	Claimed Jurisdiction	Accurate
502-802-████████	639	20-Aug-08	10:49 a.m.	270-422-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
502-802-████████	640	20-Aug-08	10:50 a.m.	270-668-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
502-802-████████	643	20-Aug-08	11:12 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
502-802-████████	644	20-Aug-08	11:14 a.m.	270-422-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	32	20-Aug-08	10:37 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	34	20-Aug-08	10:40 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	35	20-Aug-08	10:45 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	36	20-Aug-08	10:45 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	37	20-Aug-08	10:51 a.m.	270-422-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	38	20-Aug-08	10:54 a.m.	270-668-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	40	20-Aug-08	11:12 a.m.	270-422-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No
812-989-████████	42	20-Aug-08	11:27 a.m.	270-351-████████	Covington, KY	intrastate	Inter MTA	IXC	interstate	No

Kentucky LATAs & MTAs

LATAs are geographic regions that are unique to the telecommunications industry. Telephone calls between two parties in different LATAs must, by law, be 'transported' by a long-distance carrier. In general, each LATA contains a single major metropolitan area.

- Cincinnati
- Knoxville
- Louisville
- Memphis
- Nashville
- Owensboro
- Winchester

MTA 18: Cincinnati-Dayton

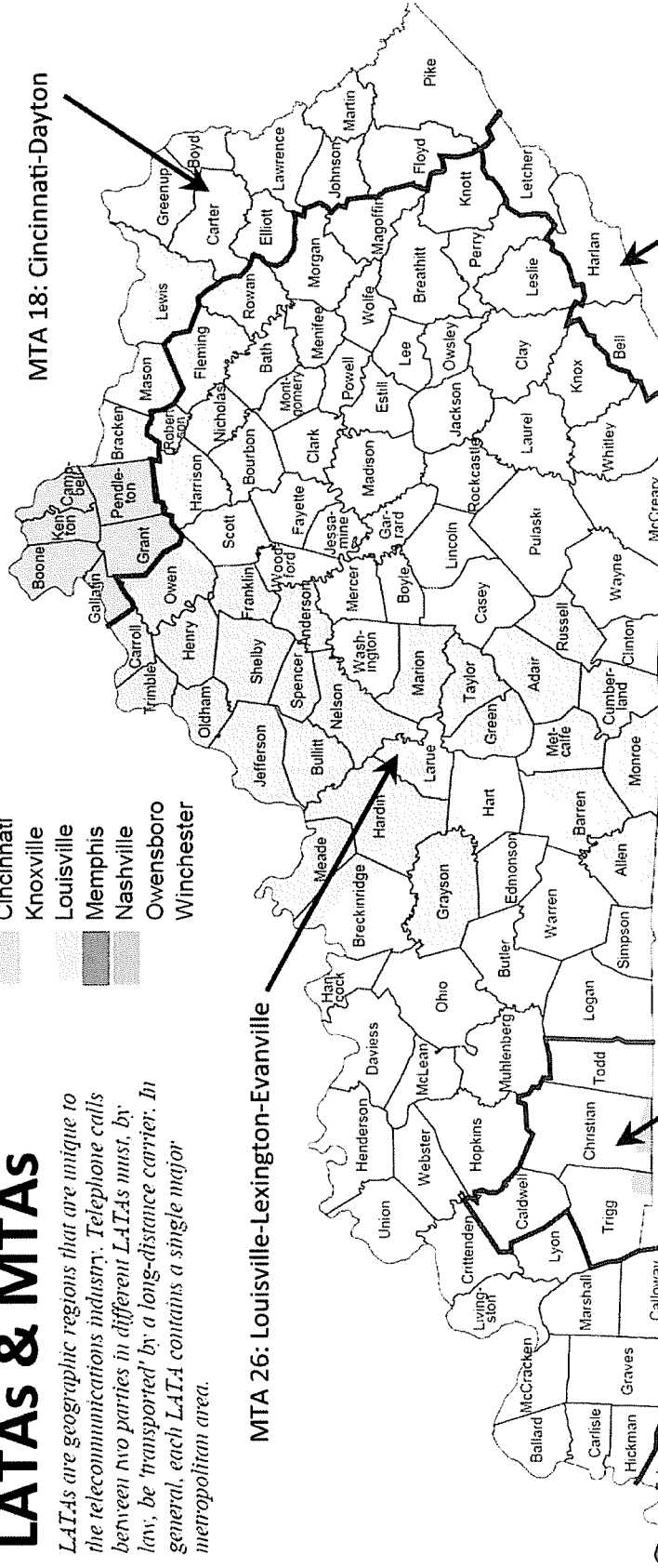
MTA 26: Louisville-Lexington-Evanville

MTA 44: Knoxville

0 10 20 30 40 50 Miles

MTA 43: Nashville

MTA 28: Memphis-Jackson



REDACTED

Brandenburg Telephone

— Analysis of Amounts Owed to Brandenburg from Sprint

Sprint's Billing since Nov. 07

	Cabs Bill	Paid Amount	Disputed Amount	Total Unpaid Amount	Unpaid NonDisputed Amount
16-Nov-07					
16-Dec-07					
16-Jan-08					
16-Feb-08					
16-Mar-08					
16-Apr-08					
16-May-08					
16-Jun-08					
16-Jul-08					
16-Aug-08					
16-Sep-08					
16-Oct-08					
16-Nov-08					
16-Dec-08					
16-Jan-09					
16-Feb-09					
16-Mar-09					
16-Apr-09					
16-May-09					
16-Jun-09					
16-Jul-09					

Totals