



S T O L L · K E E N O N · O G D E N
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July 21, 2009

HAND DELIVERY

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

RECEIVED

JUL 22 2009

PUBLIC SERVICE
COMMISSION

Re: **Complaint of Sprint Communications Company LP Against Brandenburg Telephone Company and Request for Expedited Relief**
Case No. 2008-00135

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Sprint Communications Company, L.P.'s Direct Testimony of Julie A. Walker, including attachments. Attachments 4 and 7 are Confidential, as are portions of the testimony. Accordingly, only one copy of any confidential material is included. A Petition for Confidential Treatment is included.

We are also filing an Amended Complaint in this matter. An original and ten copies are included.

Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me via the enclosed self addressed, postage prepaid envelope.

Should you have any questions please contact me at your convenience.

Sincerely yours,

Douglas F. Brent

DFB:jms
Enclosures

Jeff DeRouen
March 25, 2009
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cc: Parties of Record
John N. Hughes
Philip R. Schenkenberg

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

IN THE MATTER OF COMPLAINT OF SPRINT COMMUNICATIONS COMPANY L.P. AGAINST BRANDENBURG TELEPHONE COMPANY AND REQUEST FOR EXPEDITED RELIEF	Case No. 2008-00135
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SPRINT'S AMENDMENT TO COMPLAINT

Sprint Communications Company L. P. ("Sprint") filed its original complaint on April 10, 2008. Paragraph 22 of that complaint stated the period covered by the complaint began on March 1, 2006. Since April 2008 Sprint has continued to investigate issues surrounding its dispute with the Defendant, Brandenburg Telephone Company ("Brandenburg"). In addition, the Commission has conducted an informal conference and the parties have engaged in discovery. Sprint has determined that Brandenburg's overbilling was occurring for bills issued beginning in January 2002.¹ If the Commission grants all relief to which Sprint is entitled, the refund period will be from January 2002 to the present. . Accordingly, Sprint hereby amends Paragraph 22 of its Complaint against Brandenburg, as follows:

22. For the period beginning January 1, 2002 through January 2009, , Brandenburg's unlawful charges amounted to approximately \$1,934,234. As of June 2009 that amount had increased to \$2,069,576.56. This amount is based upon Sprint's PIU factor which appropriately accounts for the jurisdiction of wireless calls carried over Sprint's long distance network and delivered to Brandenburg for termination. Brandenburg has refused to apply Sprint's PIU factor because of its reliance upon the CPN/called number method for determining jurisdiction. Sprint

¹ See KPSC Case No. 2008-00135, Sprint's Response to Emergency Motion to Compel Payment of Access Charges (filed February 12, 2009), at 4.

respectfully requests that Commission find that Brandenburg is required to accept Sprint's PIU factor and adjust its access charges to Sprint accordingly for every billing period going back to January 2002.

SPRINT COMMUNICATIONS COMPANY L. P.



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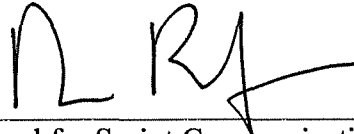
Attorneys for Sprint

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Petition was served upon the following persons by first class United States mail, postage prepaid, on the 21st day of July, 2009:

John E. Selent
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202
Counsel for Brandenburg Telephone Co.

J. D. Tobin, Jr.
President / Manager
Brandenburg Telephone Company, Inc.
200 Telco Road
P. O. Box 599
Brandenburg, KY 40108

A handwritten signature in black ink, appearing to read "N. Ry" with a long horizontal stroke extending to the right.

Counsel for Sprint Communications Co. L.P.