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August 8, 2008

AUG 08 2008

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Hon. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

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

Dear Ms. Stumbo:

Enclosed for filing in the above-referenced case, please find one original and eleven (11) copies of Brandenburg Telephone Company's Data Requests to Sprint Communications Company, L.P. Please file-stamp one copy, and return it to our courier.

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

Sincerely,

DINSMORE & SHOHL LLP

Holly C. Wallace

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Enclosures
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AUG 08 2008

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

COMPLAINT OF SPRINT COMMUNICATIONS)	
COMPANY LP AGAINST BRANDENBURG)	CASE NO.
TELEPHONE COMPANY AND REQUEST FOR)	2008-00135
EXPEDITED RELIEF)	

**BRANDENBURG TELEPHONE COMPANY'S DATA REQUESTS
TO SPRINT COMMUNICATIONS COMPANY, L.P.**

Brandenburg Telephone Company ("Brandenburg Telephone"), by counsel, and pursuant to the August 1, 2008 Order entered by the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in this matter, hereby propounds the following data requests upon Sprint Communications Company, L.P.¹ These data requests shall be answered in accordance with the Commission's August 1, 2008 Order.

DATA REQUEST NO. 1:

Please identify all of the NPAs in Kentucky, Indiana and any other state associated with switch "540" identified in the "Brandenburg Traffic Study" conducted by Sprint and provided to Brandenburg Telephone on August 1, 2008.

RESPONSE:

DATA REQUEST NO. 2:

Please identify with specificity the CLLI or other switch designator, "Orig switch number" (as used in the Brandenburg Traffic Study) and physical address of any and all Sprint switches in

¹ In its Complaint, Sprint alleges that it terminates long-distance commercial mobile radio service ("CMRS") traffic on behalf of Sprint Spectrum Limited Partnership and SprintCom (collectively, "Sprint PCS"), and Nextel West Corp and NPCR, Inc. (collectively, "Nextel"). Accordingly, the term "Sprint" shall hereinafter refer to Sprint Communications Company, L.P., Sprint PCS and Nextel, collectively.

Kentucky, Tennessee, Ohio and Indiana that may serve as the initial entrance point into the Sprint network for calls originated in Kentucky and for calls originated in another state. Please identify the other state(s) in your answer.

RESPONSE:

DATA REQUEST NO. 3:

Please explain in detail how Sprint jurisdictionalizes calls to the switches identified in response to Data Request No. 2 when the switches serve as the initial entrance point into the Sprint network.

RESPONSE:

DATA REQUEST NO. 4:

Please explain how Sprint determines which switch routes CMRS traffic that is originated and terminated within an MTA along a state border.

RESPONSE:

DATA REQUEST NO. 5:

Please explain the circumstances under which a landline call originated in Kentucky and terminated to a Brandenburg Telephone number in Kentucky would be jurisdictionalized by Sprint as interstate.

RESPONSE:

DATA REQUEST NO. 6:

Please identify with specificity the CLLI or other switch designator, “Orig switch number” (as used in the Brandenburg Traffic Study) and physical address of any and all Sprint wireless switches in Kentucky, Tennessee, Ohio and Indiana.

RESPONSE:

DATA REQUEST NO. 7:

Please identify with specificity the site name and physical address of all Sprint cellular telephone sites in Kentucky, Tennessee, Ohio and Indiana.

RESPONSE:

DATA REQUEST NO. 8:

Please explain in detail the methodology Sprint utilized to assign the state LATA indicator in the call detail records generated by Sprint and reported to Brandenburg Telephone in the Brandenburg Traffic Study.

RESPONSE:

DATA REQUEST NO. 9:

Please explain in detail how Sprint prepared the Brandenburg Traffic Study. Your answer should include the source of the call detail records used as the basis of the Traffic Study, identify all of the types of traffic included in the Traffic Study and identify all of the types of traffic excluded from the Traffic Study.

RESPONSE:

DATA REQUEST NO. 10:

Please explain how Sprint populated the “originating information digits” in the Brandenburg Traffic Study.

RESPONSE:

DATA REQUEST NO. 11:

Please identify the CLLI or other switch designator and “Orig switch number” (as used in the Brandenburg Traffic Study) of the Sprint switch used to terminate traffic to Brandenburg Telephone pursuant to the CMRS Interconnection Agreement between Sprint Spectrum and Brandenburg Telephone approved by the Commission with an effective date of September 29, 2005.

RESPONSE:

DATA REQUEST NO. 12:

Please identify by county how many Sprint:

- (a) landline long-distance customers had an address of record in Kentucky as of July 1, 2006.
- (b) wireless customers had an address of record in Kentucky as of July 1, 2006.

RESPONSE:

DATA REQUEST NO. 13:

Please identify by county how many Sprint:

- (a) landline long-distance customers had an address of record in Kentucky as of July 1, 2008.

(b) wireless customers had an address of record in Kentucky as of July 1, 2008.

RESPONSE:

DATA REQUEST NO. 14:

Please identify with specificity the location of Sprint's switch "540" identified in the Brandenburg Traffic Study.

RESPONSE:

DATA REQUEST NO. 15:

Provide all terminating call detail records generated by Sprint's switches for traffic terminated by Sprint to Brandenburg Telephone for the week of August 17, 2008 through August 23, 2008.

RESPONSE:

DATA REQUEST NO. 16:

Provide terminating call detail records for May 11, 2008 through May 18, 2008 for CMRS traffic terminated by Sprint to Brandenburg Telephone over the interconnection facilities established pursuant to the CMRS Interconnection Agreement between Brandenburg Telephone and Sprint Spectrum and approved by the Commission with an effective date of September 29, 2005.

RESPONSE:

DATA REQUEST NO. 17:

Specify when Sprint first identified the alleged inaccuracy of the jurisdictionalization of terminating access calls in Brandenburg Telephone's CABs bills to Sprint.

RESPONSE:

DATA REQUEST NO. 18:

Specify when Sprint first notified Brandenburg Telephone of the alleged inaccuracy of the jurisdictionalization of terminating access calls in Brandenburg Telephone's CABs bills to Sprint.

RESPONSE:

DATA REQUEST NO. 19:

Identify any and all companies with which Sprint has resolved a dispute regarding the jurisdictionalization of terminating access calls, and specify the percentage of interstate usage ("PIU") established as part of each resolution.

RESPONSE:

DATA REQUEST NO. 20:

Identify the PIU factor Sprint and AT&T of Kentucky have agreed to use with regard to CABs bills for terminating access.

RESPONSE:

DATA REQUEST NO. 21:

Identify the PIU factor Sprint and Windstream Kentucky East have agreed to use with regard to CABs bills for terminating access.

RESPONSE:

DATA REQUEST NO. 22:

Is Sprint's network configured in a manner that would permit it to route a wireline or wireless call originating in Kentucky and terminating to an end-user physically located in Kentucky through a switch located outside of Kentucky so that the call would appear to be interstate in nature? Please explain.

RESPONSE:

DATA REQUEST NO. 23:

Please identify any assumptions or allocation factors that were utilized or applied in the Brandenburg Traffic Study, and please explain in detail how those assumptions or factors were derived or calculated.

RESPONSE:

DATA REQUEST NO. 24:

Please produce copies of all documents of any nature whatsoever (paper, electronic, etc.) upon which Sprint relied, or to which Sprint referred, in answering any and all of Brandenburg Telephone's data requests to Sprint.

RESPONSE:

DATA REQUEST NO. 25:

For each data request above, please identify each and every person who provided information to respond to the data request, or who participated in the preparation of the response to the data request.

RESPONSE:

Respectfully submitted,



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Edward T. Depp
Holly C. Wallace
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Louisville, Kentucky 40202
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(502) 585-2207 (fax)
Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was mailed this 8th day of August, 2008, to:

John N. Hughes
Attorney at Law
124 West Todd Street
Frankfort, KY 40601
Counsel for Sprint Communication Company, L.P.



Counsel to Brandenburg Telephone Company