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August 29, 2008

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AUG 29 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 L.P.
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 Response to Sprint's First Request for Information in the above-referenced case. 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

HCW/rk
Enclosures

cc: All Parties of Record
John E. Selent, Esq.
Edward T. Depp, Esq.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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AUG 29 2008

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 RESPONSE TO SPRINT'S FIRST REQUEST FOR INFORMATION

Brandenburg Telephone Company ("Brandenburg Telephone"), by counsel, hereby responds to Sprint Communications Company L.P.'s ("Sprint's") First Request for Information.

REQUEST NO. 1:

Describe with specificity the corporate structure of the Company including:

- a. a listing of all affiliates and subsidiaries;
- b. a complete list of all officers and directors.

RESPONSE: (a) Brandenburg Telephone objects on the grounds that the information sought is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

(b) Brandenburg Telephone objects on the grounds that the information sought is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 2:

Provide a copy of Brandenburg Telephone Company's Audited Financial Statements for the last three fiscal years.

RESPONSE: Brandenburg Telephone objects on the grounds that this request seeks confidential, proprietary information that is irrelevant and not reasonably calculated to lead to the

discovery of admissible evidence. Subject to the objection, and without waiving same, Brandenburg Telephone refers Sprint to Brandenburg Telephone's annual reports for the last three years on file with the Kentucky Public Service Commission.

REQUEST NO. 3:

Describe with specificity the process, including the types of technology (i.e. systems, programs, calculations), used by the Company to identify the jurisdiction of any and all switched access traffic billed to Sprint's interexchange carrier operations.

RESPONSE: Brandenburg Telephone employs the same process to jurisdictionalize access traffic billed to Sprint as it uses to jurisdictionalize access traffic billed to other interexchange carriers. Brandenburg Telephone uses a DMS 100/200 Nortel switch in its network. Approximately every two hours, the Super Node Data Manager hardware that comprises part of the 100/200 DMS switch produces a standard LSSGR AMA (LATA Switching System Generic Requirements Automatic Message Accounting) record that is transmitted via a dedicated Ethernet line from the switch to Brandenburg Telephone's Carrier Access Billing System ("CABS"), an AS400-based application written in RPG. The CABS system utilizes jurisdiction indicators in the LSSGR AMA records and checks them against the Terminating Point Master database ("TPM") to jurisdictionalize and rate the traffic. The TPM is updated quarterly by Telcordia. Traffic that cannot be jurisdictionalized against the TPM, including special dialing services (i.e., 800, 900 numbers) and call records without Calling Party Numbers ("CPNs"), are jurisdictionalized based on Percent of Interstate Usage ("PIU") factors pursuant to Brandenburg Telephone's intrastate and interstate access tariffs.

REQUEST NO. 4:

Provide a complete listing of any specific agreements, arrangements or understandings concerning the exchange of interexchange traffic between Brandenburg and any third party regarding the application of a Percent of Interstate Use ("PIU") factor, as such terms is used in either the Duo County Telephone Cooperative Corp., Inc., PSC KY NO. 2A, for intrastate services and/or NECA Tariff No. 5, including but not limited to any settlement or arrangement which resulted from the complaint proceeding of Brandenburg Telephone Company v. Global Crossing, Inc. in Case No. 2006-00341.

RESPONSE: The exchange of interexchange traffic between Brandenburg Telephone and third parties is governed by Brandenburg Telephone's access tariffs, specifically, Duo County Telephone Cooperative Corp., Inc., PSC KY NO. 2A for intrastate access traffic and NECA Tariff FCC No. 5 for interstate access traffic. Brandenburg Telephone does not have any specific agreements, arrangements or understandings with interexchange carriers concerning the application of a PIU factor outside of the tariff provisions.

REQUEST NO. 5:

Provide a monthly historical analysis of the Company's billed Minutes of Use (MOU) and dollars for Interstate and Intrastate MOU for each of the following years: 2005, 2006 and 2007.

RESPONSE: Brandenburg Telephone objects on the grounds that this request seeks confidential, proprietary information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the objection, and without waiving same, Brandenburg Telephone refers Sprint to Brandenburg Telephone's annual reports for the last three years on file with the Kentucky Public Service Commission.

REQUEST NO. 6:

Provide a monthly historical analysis of the Company's Minutes of Use (MOU) for which the process described in response to Sprint's Request for Information 3 above is unable to identify the jurisdiction of the MOU for each of the following years: 2005, 2006 and 2007.

- a. For the MOU identified in this response describe with specificity the process followed by the Company to identify the jurisdiction of the MOU for billing.

RESPONSE: Brandenburg Telephone is able to jurisdictionalize the Company's MOUs through the process outlined in response to Request No. 3.

REQUEST NO. 7:

Provide copies of all documents upon which the Company relies to support any response to any Request for Information.

RESPONSE: Brandenburg Telephone objects to this request to the extent it seeks the production of confidential and proprietary information. Subject to this objection, and without waiving same, Brandenburg Telephone states there are no such documents other than the documents specifically identified herein.

REQUEST NO. 8:

With the response to each Request for Information, identify each person who assisted in the preparation of that Request for Information response, or who provided information for the purpose of preparing such response.

RESPONSE: In addition to the undersigned counsel, Allison T. Willoughby, Assistant General Manager of Brandenburg Telephone, Randall Bradley, Controller of Brandenburg

Telephone, and Eileen Bodamer, of Bodamer Consulting, LLC, assisted in the preparation of the responses to Sprint's First Request for Information.

Respectfully submitted,

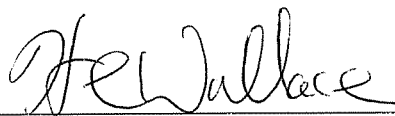


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Counsel to Brandenburg Telephone Company

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was mailed this ^{29th}~~29~~ 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