

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

AN INVESTIGATION INTO THE INTRASTATE	)	ADMINISTRATIVE
SWITCHED ACCESS RATES OF ALL	)	CASE NO.
KENTUCKY INCUMBENT AND COMPETITIVE	)	2010-00398
LOCAL EXCHANGE CARRIERS	)	

**SPRINT NEXTEL’S DATA REQUESTS TO TDS COMPANIES**

Pursuant to the Kentucky Public Service Commission’s (“Commission” or “KPSC”) Order issued on March 10, 2011, Sprint Communications Company L.P., Sprint Spectrum, L.P. and SprintCom, Inc. d/b/a Sprint PCS, Nextel West Corp., Inc., and NPCR, Inc., d/b/a Nextel Partners (collectively, “Sprint Nextel”) issues the following Data Requests to Leslie County Telephone Company, Lewisport Telephone Company, and Salem Telephone Company, subsidiaries of TDS Telecommunications Corp. (“TDS Companies”)

**DEFINITIONS**

"You," "your," or “TDS Companies” refers to the TDS Companies, their officers, employees, and authorized agents.

"Document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, e-mail, facsimile ("fax"), cable, report, recording, contract, agreement,

study, handwritten note, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape, disk, file stored on computer, or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

"Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name, residential and business address, and business relationship to the TDS Companies or Sprint; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the nature of the document in sufficient detail for identification in a request for production, its title, its date, the name or names of its authors and recipients, its present location or custodian, and if the information or document identified is recorded in electrical, optical or electromagnetic form, a description of the computer hardware and software required to reduce it to humanly readable form; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

"Act" refers to the Communications Act of 1934, as amended (including, without limitation, as amended by the Telecommunications Act of 1996).

"KPSC" refers to the Kentucky Public Service Commission.

"ILEC" means an incumbent local exchange carrier as defined in 47 U.S.C. Section 251(h).

"Referring" or "relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

"Sprint Nextel" refers to Sprint Communications Company L.P., Sprint Spectrum, L.P. and SprintCom, Inc. d/b/a Sprint PCS, Nextel West Corp., Inc., and NPCR, Inc., d/b/a Nextel Partners.

"Telecommunications Service," "basic local exchange" and "local exchange services" are used herein to have the same definitions contained in federal and state rules and regulations.

"Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

"And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories anything that would not otherwise be brought within their scope.

"FCC" refers to the Federal Communications Commission.

The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

## **INSTRUCTIONS**

These Data Requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. When the information requested by a Data Request varies over time, state the response for each period of time as to which the response differs, and identify the time periods. If you cannot answer a Request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of a Request, you should so state in your response, describing in full your efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If you object to any part of a Request, answer all parts of the Request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

These Data Requests are continuing in nature. In the event that you obtain additional information with respect to any Request after it has been answered, you are required to supplement your response promptly following receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement your responses, please so state.

If any response required by way of answer to these Data Requests is considered to contain confidential or protected information, please furnish this information subject to the Confidentiality Agreement executed by the parties in this proceeding.

In the event you assert that any information requested herein is privileged, you should identify any such information and any supporting documents in your written response, by date, and provide a general description of its content. You also should identify all persons who participated in the preparation of the document and all persons, inside or outside of

the TDS Companies, who received a copy, read or examined any such document. In addition, you should describe, with particularity, the grounds upon which privilege is claimed.

In the event that you assert that any requested information is not available in the form requested, in your written response thereto, you should disclose the following:

- a. The form in which the requested information currently exists (identifying documents by title or description); and
- b. The earliest dates, time period, and location that representatives of Sprint Nextel may inspect your files, records or documents in which the information currently exists.

For each Request answered, provide the name of the person or persons answering, the title of such person(s), and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response. If you do not intend to call or present a witness who is prepared to testify concerning the matters contained in any response, please so state.

Unless otherwise indicated, the information sought in these Data Requests relate to the TDS Companies' operations in Kentucky.

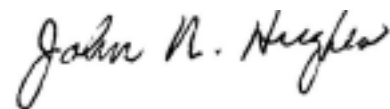
**DATA REQUESTS**

1. Referring to Mr. Mottern's discussion of affordable local service rates at pages 9-10 his Direct Testimony, please provide any and all studies developed by or on behalf of the TDS Companies that:
  - a. Demonstrates what constitutes affordable local service.
  - b. Demonstrates that line losses will increase with local rate increases.
2. Referring to page 10, lines 14-19 of Mr. Mottern's Direct Testimony:

- a. Can customers in the TDS Companies' service areas purchase cable telephony service?
  - b. Can customers in the TDS Companies' service areas purchase wireless service?
  - c. Can customers in the TDS Companies' service areas purchase voice service from other service providers?
  - d. What portion of the population in the TDS Companies' service areas are currently served by each of these technology alternatives?
  - e. What percentage of the access lines in the TDS Companies' service areas are currently served by each of these technology alternatives?
3. Referring to page 11 of Mr. Mottern's Direct Testimony:
- a. Are the TDS Companies' broadband services provided on the local loop?
  - b. Do the TDS Companies collect any local loop cost in the prices of their retail broadband service?
  - c. Do the TDS Companies collect any local loop cost in the prices of their wholesale broadband service?
  - d. If an ILEC provisions video services over the local loop using such technology as IPTV, should those services recover some portion of the cost of the local loop?
4. Referring to Mr. Mottern's Direct Testimony at page 11, line 8-10, please explain how other carriers being forced to support ILEC services costs

through state universal service funding would be “competitively neutral” in comparison to the ILECs receiving the funds.

- a. Are the ILECs going to offset some of the operating costs of the cable telephony providers trying to compete with the ILECs?
  - b. Are the ILECs going to offset some the operating costs of the wireless service providers trying to compete with the ILECs?
5. Please refer to the following statement by Mr. Mottern in his Direct Testimony at page 11, line 16 to page 12, line 2: “All of these carriers utilize the PSTN and the network provided by the TDS Companies...”
- a. Do the TDS Companies “utilize” the networks of the cable telephony providers to complete their customers’ calls to cable telephony customers?
  - b. Do the TDS Companies “utilize” the networks of the wireless service providers to complete their customers’ calls to wireless customers?
  - c. Do the TDS Companies continue to define the PSTN as the ILECs’ networks only?
  - d. Haven’t the various competitive carriers also built networks that now allow customers to communicate nearly anywhere they are located, not just in their homes?



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