

**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’S OBJECTIONS AND RESPONSES TO WINDSTREAM’S DATA REQUESTS**

Sprint Communications Company L.P., Sprint Spectrum L.P. d/b/a Sprint PCS, Nextel West Corp., and NPCR, Inc., d/b/a Nextel Partners (collectively, “Sprint Nextel”) hereby submits its Objections and Responses to the first set of data requests issued by Windstream Kentucky East, LLC, and Windstream Kentucky West, LLC (“Windstream”) on May 2, 2011, in the above-styled case.

**SPRINT NEXTEL’S OBJECTIONS AND RESPONSES TO DATA REQUESTS**

**General Objection**

Sprint Nextel objects to each and every data request to the extent it is based on the incorrect assumption that “access minutes of use” for which Sprint Nextel disputed the invoice and did not pay were correctly categorized as access minutes of use. Sprint Nextel asserts that none of these minutes are “access minutes of use” as the requests imply, and indeed, the basis for its non-payment of the LEC access invoices in question is the fact that access charges do not apply to these minutes because it is not access traffic.

RESPONSIBLE WITNESS: Objection by counsel.

**1. For the year 2010, please provide, by local exchange carrier (“LEC”) in Kentucky, the originating access minutes of use (“MOUs”) for which you compensated each LEC or, in a case where you did not remit the compensation, for which you were billed by each LEC.**

OBJECTION AND RESPONSE: Sprint Nextel objects to this request to the extent that it is unduly burdensome. Sprint Nextel’s systems produce one expense amount for the outstanding dispute without the responding minutes. A response at the requested level of detail would require a burdensome, time-consuming special study to determine the split of each of the outstanding disputes as requested. Subject to and without waiving its objection, Sprint Nextel responds as follows: see attached confidential spreadsheet, which is being submitted to the Commission under seal pursuant to Sprint Nextel’s concurrently filed Petition for Confidentiality, and which is also being submitted to Windstream pursuant to the Sprint-Windstream “Information Exchange and Non-Disclosure Agreement”..

RESPONSIBLE WITNESS: James Appleby. Objection by counsel.

**2. With respect to the originating access minutes of use (“MOUs”) that you provided in response to Data Request No. 1, please provide the corresponding amounts that you paid each carrier that you identified in your response for the year 2010. In the case in which you did not remit the compensation to the carrier, please provide the amounts that you were billed, invoiced, or otherwise charged by the carrier.**

OBJECTION AND RESPONSE: Sprint Nextel objects to this request to the extent that it is unduly burdensome. Sprint Nextel’s systems that contain the information relating to its disputes with Kentucky ILECs do not track the disputes between interstate and intrastate, or originating or terminating amounts. The systems produce one number for the outstanding dispute. A response at the requested level of detail would require a burdensome, time-consuming special study to determine the split of each of the

outstanding disputes as requested. Subject to and without waiving its objection, Sprint Nextel responds as follows: see attached confidential spreadsheet and attached confidential list of active disputes with Kentucky ILECs, which are being submitted to the Commission under seal pursuant to Sprint Nextel's concurrently filed Petition for Confidentiality, and which are also being submitted to Windstream pursuant to the Sprint-Windstream "Information Exchange and Non-Disclosure Agreement"..

RESPONSIBLE WITNESS: James Appleby. Objection by counsel.

**3. For the year 2010, please provide, by local exchange carrier ("LEC") in Kentucky, the terminating access minutes of use ("MOUs") for which you compensated each LEC, or, in a case where you did not remit the compensation, for which you were billed by each LEC.**

OBJECTION AND RESPONSE: Sprint Nextel objects to this request to the extent that it is unduly burdensome. Sprint Nextel's systems produce one expense amount for the outstanding dispute without the responding minutes. A response at the requested level of detail would require a burdensome, time-consuming special study to determine the split of each of the outstanding disputes as requested. Subject to and without waiving its objection, Sprint Nextel responds as follows: see attached confidential spreadsheet, which is being submitted to the Commission under seal pursuant to Sprint Nextel's concurrently filed Petition for Confidentiality, and which is also being submitted to Windstream pursuant to the Sprint-Windstream "Information Exchange and Non-Disclosure Agreement"..

RESPONSIBLE WITNESS: James Appleby. Objection by counsel.

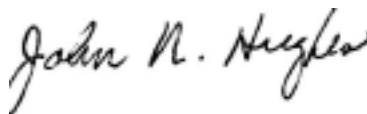
**4. With respect to the terminating access minutes of use ("MOUs") that you provided in response to Data Request No.3, please provide the corresponding amounts that you paid each carrier that you identified in your response for the year 2010. In the**

**case in which you did not remit the compensation to the carrier, please provide the amounts that you were billed, invoiced, or otherwise charged by the carrier.**

OBJECTION AND RESPONSE: Sprint Nextel objects to this request to the extent that it is unduly burdensome. Sprint Nextel's systems that contain the information relating to its disputes with Kentucky ILECs do not track the disputes between interstate and intrastate, or originating or terminating amounts. The systems produce one number for the outstanding dispute. A response at the requested level of detail would require a burdensome, time-consuming special study to determine the split of each of the outstanding disputes as requested. Subject to and without waiving its objection, Sprint Nextel responds as follows: see attached confidential spreadsheet and attached confidential list of active disputes with Kentucky ILECs, which are being submitted to the Commission under seal pursuant to Sprint Nextel's concurrently filed Petition for Confidentiality, and which are also being submitted to Windstream pursuant to the Sprint-Windstream "Information Exchange and Non-Disclosure Agreement"..

RESPONSIBLE WITNESS: James Appleby. Objection by counsel.

Submitted this 10th day of June, 2011.

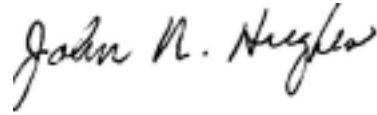


---

John N. Hughes  
124 W. Todd Street  
Frankfort, Kentucky 40601  
(502) 227-7270

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served on the parties on the Commission's official Service List by depositing same in the United States mail, First Class and postage prepaid, on the 10<sup>th</sup> day of June, 2011.



\_\_\_\_\_  
John N. Hughes