

**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 OBJECTIONS AND RESPONSES TO RLECS’ SECOND 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”) submits its Objections and Responses to the Second Data Requests issued by the RLECs<sup>1</sup> (“RLECs”) on August 5, 2011, in the above-styled case.

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

**REQUEST NO. 1: At page 6, lines 20-21, Mr. Appleby testifies that “the carriers assessing the inflated access rates are also participants in the toll market...” Please identify all the carriers to whom Mr. Appleby was referring.**

RESPONSE: As explained in testimony starting at page 4, line 21, through page 6, line 5, the toll market is no longer comprised of just interexchange carriers. Cable telephony, wireless, ILECs and traditional CLECs all offer non-local calling to retail customers. All of these carriers also offer intrastate switched access except wireless carriers. If a carrier’s intrastate switched access rates exceed its interstate rate, its intrastate rates are inflated. Sprint Nextel does not

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<sup>1</sup>Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone Company, Duo County Telephone Cooperative Corporation, Inc., Foothills Rural Telephone Cooperative, Inc., Gearhart Communications Co., Inc., Highland Telephone Cooperative, Inc., Logan Telephone Cooperative, Inc., Mountain Rural Telephone Cooperative, Inc., North Central Telephone Cooperative Corporation, Peoples Rural Telephone Cooperative, Inc., South Central Rural Telephone Cooperative Corporation, Inc., Thacker-Grigsby Telephone Company, Inc., and West Kentucky Rural Telephone Cooperative Corporation, Inc. (collectively the “RLECs”).

possess a list of all carriers offering non-local calling and also switched access service in Kentucky.

RESPONSIBLE WITNESS: James Appleby.

**REQUEST NO. 2: Please explain whether teledensity, as used at page 15, line 16, and other locations in Mr. Appleby's testimony accounts for the following:**

- (a) Topography;**
- (b) Vegetation/Forestation;**
- (c) Average household income; or**
- (d) Median household income.**

RESPONSE: The definition and value of a teledensity measure is provided in testimony at page 18, lines 1-6. None of the four factors listed in this question are considered in a teledensity measurement.

RESPONSIBLE WITNESS: James Appleby.

**REQUEST NO. 3: Did Mr. Appleby perform any statistical analysis to determine whether it is appropriate to compare the average teledensity of Kentucky's rural ILECs to the teledensity of the non-BOC service areas of the entire United States? If so, please provide that analysis.**

RESPONSE: No - all analysis performed was provided in the testimony and exhibits.

RESPONSIBLE WITNESS: James Appleby

**REQUEST NO. 4: Does Sprint propose to abolish carrier of last resort ("COLR") obligations for Kentucky incumbent local exchange carriers? If so, please explain how it proposes the statutory objective of universal service will be satisfied. If not, please explain how incumbent local exchange carriers will be able to meet their COLR obligations under the access reform plan proposed by Sprint.**

RESPONSE: Sprint Nextel does not propose any changes to COLR obligations. Sprint Nextel believes the incremental revenues ILECs are able to generate from the additional services they provide to their customer base, as well as increases to the currently low local service rates, will

more than offset any access revenue reductions, which will permit the ILECs to continue to serve customers in their service areas.

RESPONSIBLE WITNESS: James Appleby.

**REQUEST NO. 5: Please identify the “full suite of services” that Mr. Appleby alleges the RLECs offer. (See Test. Of J. Appleby at 23:8.)**

RESPONSE: The section of testimony beginning at page 23, line 21, lists the full suite of the services providers are offering to their customers, usually over the local network.

RESPONSIBLE WITNESS: James Appleby.

**REQUEST NO. 6: Please produce all documents that evidence, support, or relate to Sprint’s responses to these data requests.**

RESPONSE: All documents and evidence in support of testimony was provided with the testimony. Documents in response to Request No. 7 are attached (see below).

RESPONSIBLE WITNESS: James Appleby

**REQUEST NO. 7: Please provide copies of all correspondence and other filings made by Sprint at the FCC in conjunction with the pending ICC reform (WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket No. 01-92, 96-45; and GN Docket No. 09-51).**

OBJECTION AND RESPONSE: Sprint Nextel objects to this request to the extent that it calls for publicly available documents that are as accessible to the RLECs as to Sprint Nextel. Subject to and without waiving Sprint’s objection, Sprint Nextel responds as follows: In accordance with the disclosure obligations at the Federal Communications Commission (“FCC”), all correspondence and filings are available at the following website for each docket listed in this question by simply typing in the docket and filer’s name.

[http://fjallfoss.fcc.gov/ecfs/comment\\_search/input;jsessionid=TQJS6n1jcgqGvxMK5f55h5wR2qhjrssGTQgDkzTskYCLK1NR87SC!1319056511!NONE?z=ovcbo](http://fjallfoss.fcc.gov/ecfs/comment_search/input;jsessionid=TQJS6n1jcgqGvxMK5f55h5wR2qhjrssGTQgDkzTskYCLK1NR87SC!1319056511!NONE?z=ovcbo)

In addition, attached hereto are copies of Sprint Nextel's most recent filings in WC Docket No. 10-90, *In the Matter of Connect America Fund*: Comments of Sprint Nextel Corporation (filed August 24, 2011); Reply Comments of Sprint Nextel Corporation (filed May 23, 2011); and Comments of Sprint Nextel Corporation (filed April 18, 2011).

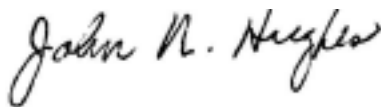
RESPONSIBLE WITNESS: James Appleby. Objection by counsel.

**REQUEST NO. 8: Please explain how Sprint's position with respect to ICC reform at the FCC affects its position in this matter.**

RESPONSE: Sprint Nextel's public policy position in this matter is consistent with its public policy position at the FCC in its ICC reform proceeding. Sprint Nextel advocates for switched access rate decreases with carriers permitted to increase their retail rates in order to recover lost revenues. Sprint Nextel also does not believe access overcharges should be shifted to universal service support mechanisms unless a financial need is demonstrated. When considering all of the services provided on the local networks today, Sprint Nextel does not believe an ILEC can demonstrate a financial need to burden other providers in the market with high access rates or universal service support payment obligations.

RESPONSIBLE WITNESS: James Appleby

Submitted this 2nd day of September, 2011.



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