

BEFORE THE PUBLIC SERVICE COMMISSION SEP 15 1999

## STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of Alma Telephone )  
Company's Filing to Revise it's Access ) Case No. TT-99-428, et al  
Service Tariff, PSC Mo. No. 2 )

**MID-MISSOURI GROUP MOTION TO COMPEL ANSWERS TO  
DATA REQUESTS FROM AT&T WIRELESS**


COMES NOW the Mid-Missouri Group and hereby moves to Compel Answers to data requests submitted by the Mid-Missouri Group to AT&T Wireless, and in support hereof states the following:

1. On July 28, 1999, the Mid-Missouri Group served data request on AT&T Wireless, a copy of which are attached hereto and incorporated by reference as Appendix 1.
2. Over twenty (20) days have elapsed from the date of service of the data requests, and to date the Mid-Missouri Group has received no Answers, Objections, or any Responses whatsoever to the data requests submitted.
3. AT&T Wireless applied and was allowed to intervene as a party in this preceding, and as such has an obligation to produce the data requested.
4. All of the data requested is relevant, pertinent, and material to the issues in this docket.

WHEREFORE, the basis of the foregoing, the Mid-Missouri Group respectfully requests that the Commission issue an order directing AT&T Wireless to provide Answers to these data requests to the Mid-Missouri Group counsel no later than September 30, 1999, which will be a minimum time to allow incorporation of the Responses into surrebuttal testimony due from the Mid-Missouri Group on October 4<sup>th</sup>.

ANDERECK, EVANS, MILNE  
PEACE & BAUMHOER


By

  
Craig S. Johnson  
MO Bar # 28179  
Hawthorn Bldg. - 3rd Floor  
305 East McCarty Street  
P.O. Box 1438  
Jefferson City, MO 65102  
Telephone: 573/634-3422  
Facsimile: 573/634-7822

ATTORNEYS FOR MID-MISSOURI GROUP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 15<sup>th</sup> day of September, 1999, to all attorneys of record.

  
Craig S. Johnson

ANDERECK, EVANS, MILNE, PEACE & BAUMHOER

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OF COUNSEL

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

July 28, 1999

Mr. Paul DeFord  
Attorney at Law  
2345 Grand Blvd.  
Kansas City, MO 64108

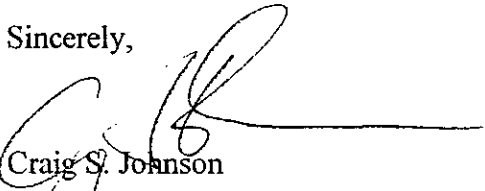
RE: Consolidated Case Nos. TT-99-428, TT-99-429, TT-99-430, TT-99-431,  
TT-99-432, and TT\_99-433

Dear Mr. DeFord:

Please find enclosed 5 data requests on behalf of the Mid-Missouri Group.

Thank you.

Sincerely,

  
Craig S. Johnson

**CSJ/krm/Enc.**

TRENTON OFFICE  
9th AND WASHINGTON  
P.O. BOX 547  
TRENTON, MISSOURI 64683-0547  
660-359-2244  
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119 E. MAIN STREET  
P.O. BOX 654  
SMITHVILLE, MISSOURI 64089  
816-532-3895  
FAX 816-532-3899

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP  
DATA REQUEST NO. 1

Requested from: AT&T Wireless Services, Inc.

Date Requested: July 28, 1999

Has your company ever originated, transported, handed off, or delivered telecommunications traffic destined to be terminated in any of the Missouri exchanges of any of the following companies?

Alltel Communications Inc  
Alma Telephone Co.  
BPS Telephone Co.  
Cass County Telephone Co.  
Chariton Valley Telephone Corp.  
Choctaw Telephone Co.  
Citizens Telephone Co.  
Craw-Kan Telephone Coop  
Ellington Telephone Co.  
Farber Telephone Co.  
Goodman Telephone Co.  
Granby Telephone Co.  
Grand River Mutual Telephone Corp.  
Green Hill Telephone Corp.  
Holway Telephone Co.  
Iamo Telephone Co.  
Kingdom Telephone Co.  
KLM Telephone Co.  
Lathrop Telephone Co.

Le-Ru Telephone Co.  
Mark Twain Telephone Co.  
McDonald County Telephone Co.  
Mid-Missouri Telephone Co.  
Miller Telephone Co.  
Modern Telecommunications Co.  
MoKan Dial, Inc.  
New Florence Telephone Co.  
New London Telephone Co.  
Northeast Missouri Rural Telephone Co.  
Orchard Farms Telephone Co.  
Oregon Farmers Mutual Telephone Co.  
Ozark Telephone Co.  
Peace Valley Telephone Co.  
Rock Port Telephone Co.  
Seneca Telephone Co.  
Steelville Telephone Exchange, Inc.  
Stoutland Telephone Co.

Requested by: Craig S. Johnson

Information Provided:

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Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP  
DATA REQUEST NO. 2

Requested from: AT&T Wireless Services, Inc.

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the amount of such traffic by year for the years 1990 – 1997 destined for each of the companies listed in DR 1.

Requested by: Craig S. Johnson

Information Provided:

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Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP  
DATA REQUEST NO. 3

Requested from: AT&T Wireless Services, Inc.

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the amount of such traffic by month between January of 1998 and July of 1999 destined for each of the companies listed in DR 1.

Requested by: Craig S. Johnson

Information Provided:

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Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

MID-MISSOURI GROUP  
DATA REQUEST NO. 4

Requested from: AT&T Wireless Services, Inc.

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the following information for all such traffic since 1990:

- a. whether the traffic originated on a commercial mobile radio or wireless phone
- b. whether both the origination and termination point were within the same MTA
- c. whether the traffic was terminated to the companies listed in DR 1 by you over a direct physical interconnection with that company
- d. the identity of the company or companies that you handed off or delivered the traffic to for transport, transiting, switching, and/or termination
- e. whether the traffic was handed off or delivered to the company or companies identified in subpart d above pursuant to a tariff or pursuant to an interconnection agreement
- f. whether you have paid intercompany compensation for the termination of such traffic terminated on the facilities of the companies listed in DR 1
- g. to whom you made the payment or payments indicated in your answer to subpart f above

Requested by: Craig S. Johnson

Information Provided:

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Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.



Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP  
DATA REQUEST NO. 5

Requested from: AT&T Wireless Services, Inc.

Date Requested: July 28, 1999

Have you destroyed or not retained any records or data from which the information requested in preceding data requests 1 through 4 could have been obtained? If so, please state the dates such records or data were destroyed or not retained and the inclusive dates such destroyed or non-retained data would have included.

Requested by: Craig S. Johnson

Information Provided:

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Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_