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August 6, 1999

# Via Federal Express

Mr. Cecil Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street
5th Floor, Room 530
Jefferson City, MO 65101

FILED

AUG 0 9 1999

Salvice Commission

Re:

Sprint Spectrum L.P.'s Objections to Mid-Missouri Group's

Data Requests

Enclosed please find an original and fifteen (15) copies of Sprint Spectrum L.P.'s Objections to Mid-Missouri Group's Data Requests in the following cases: Case No. TT-99-431, Case No. TT-99-432, Case No. TT-99-433, Case No. TT-99-430, Case No. TT-99-428.

Also enclosed please find a self-addressed stamped envelope. Please return a file-stamped copy of each of application at your earliest convenience.

Thank you for your assistance.

Sincerely,

Charles W. McKee

CWM/mrs Enclosures

cc: All Parties to the Service List

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# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

) Case No. TT-99-428	Commission
) Tariff No. 9900658	
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) Case No. TT-99-429	)
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	Case No. TT-99-429 Tariff No. 9900656  Case No. TT-00-430 Tariff No. 9900712  Case No. TT-99-431 Tariff No. 9900667  Case No. TT-99-432 Tariff No. 9900657  Case No. TT-99-433

# SPRINT SPECTRUM L.P.'S OBJECTIONS TO MID-MISSOURI GROUP'S DATA REQUESTS

COMES NOW Sprint Spectrum L.P., pursuant to 4 CSR 240-2.090, and submits the following objections and responses to the Data Requests of the Mid-Missouri Group received on July 30, 1999.

#### **OBJECTIONS**

# **DATA REQUEST NO.1**

Sprint Spectrum L.P. objects to Data Request No. 1 as overly broad and burdensome and further objects that the data request does not seek information which is calculated to lead to the discovery of admissible evidence. Case Nos. TT-99-428, TT-99-429, TT-99-430, TT-99-431,

TT-99-432, and TT-99-433 concern tariff filings made by Alma Telephone Co., MoKan Dial, Inc., Mid-Missouri Telephone Co., Choctaw Telephone Co., Chariton Valley Telephone Co., and Peace Valley Co. Whether and to what extent Sprint Spectrum L.P. exchanges traffic with the thirty-two (32) other companies identified in Data Request No. 1 is irrelevant to the issue in this case.

Sprint Spectrum L.P. is currently reviewing its records to determine whether it has originated, transported, handed off or delivered telecommunications traffic destined to the five telecommunication companies subject to this proceeding. Because these records are not maintained as a part of Sprint Spectrum L.P.'s ordinary course of business, Sprint Spectrum L.P. will file a response by August 19, 1999. Sprint Spectrum expects to be able to provide a response by August 24, 1999.

#### DATA REQUEST NO. 2

Sprint Spectrum L.P. incorporates by reference its objections and response to Data Request No. 1. To the extent such information is available for those companies which are the subject of this litigation, Sprint Spectrum L.P. will provide a response by August 24, 1999.

# DATA REQUEST NO. 3

Sprint Spectrum L.P. incorporates by reference its objections and response to Data Request No. 1. To the extent such information is available for those companies which are the subject of this litigation, Sprint Spectrum L.P. will provide a response by August 24, 1999.

### **DATA REQUEST NO. 4**

Sprint Spectrum L.P. incorporates by reference its objections and response to Data Request No. 1. To the extent such information is available for those companies which are the subject of this litigation, Sprint Spectrum L.P. will provide a response by August 24, 1999.

# DATA REQUEST NO. 5

Sprint Spectrum L.P. incorporates by reference its objections and response to Data Request No. 1. To the extent such information is available for those companies which are the subject of this litigation, Sprint Spectrum L.P. will provide a response by August 24, 1999.

Respectfully Submitted,

Charles W. McKee #39710

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Kansas City, Missouri 64112

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(816) 559-2591 Facsimile

ATTORNEY FOR SPRINT SPECTRUM L.P.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Objections of Sprint Spectrum L.P. were served upon the following persons by depositing a true copy thereof in the United States mail, postage prepaid, on August 6, 1999.

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