

Charles W. McKee Legal Department Senior Attorney Sprint PCS^{*}
4900 Main, 12th Floor
Kansas City, MO 64t12
Voice 816 559 2521
Fax 816 559 2591
cmckee01@sprintspectrum.com

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

Service 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

FILED
AUG 0 9 1990

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

	one Committee
In the Matter of Alma Telephone)	Case No. TT-99-428
Company's Filing to Revise its Access)	Tariff No. 9900658
Serivce Tariff, P.S.C. Mo. No. 2	
)	
In the Matter of MoKan Dial, Inc.'s	Case No. TT-99-429
Filing to Revise its Access	Tariff No. 9900656
Service Tariff, P.S.C. Mo. No. 2	
)	
In the Matter of Mid-Missouri Telephone)	Case No. TT-00-430
Filing to Revise its Access)	Tariff No. 9900712
Service Tariff, P.S.C. Mo. No. 2	
)	
In the Matter of Choctaw Telephone)	Case No. TT-99-431
Filing to Revise its Access	Tariff No. 9900667
Service Tariff, P.S.C. Mo. No. 2	
)	
In the Matter of Chariton Valley Telephone)	Case No. TT-99-432
Filing to Revise its Access)	Tariff No. 9900657
Service Tariff, P.S.C. Mo. No. 2	
)	
In the Matter of Peace Valley Telephone)	Case No. TT-99-433
Filing to Revise its Access	Tariff No. 9900655
Service Tariff, P.S.C. Mo. No. 2	

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

4900 Main, 11th Floor

Kansas City, Missouri 64112

(816) 559-2521 Telephone

(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.

Penny Baker MO PSC Staff Attorney P.O. Box 360 Jefferson City, MO 65102

Leo Bub-Counsel Southwestern Bell Telephone Co. One Bell Center, Room 3518 St. Louis, MO 63101

W.R. England, III 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102

Paul DeFord Lathrop, Koontz & Norquist 2345 Grand Blvd. Kansas City, MO 64108 Michael F. Dandino Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Craig S. Johnson Hawthorn Bldg. – 3rd Floor 305 East McCarty Street Jefferson City, MO 65102

Jeanne A. Fischer Southwestern Bell Wireless, Inc. 13075 Manchester, 100N St. Louis, MO 63131

David Evans GTE 601 Monroe Street, Suite 304 Jefferson City, MO 65101