

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW

EUGENE E. ANDERECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

CRAIG S. JOHNSON

RODRIC A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

COREY K. HERRON

700 EAST CAPITOL AVENUE

COL. DARWIN MARMADUKE HOUSE

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

LANETTE R. GOOCH

SHAWN BATTAGLER

ROB TROWBRIDGE

JOSEPH M. PAGE

LISA C. CHASE

DEIDRE D. JEWEL

JUDITH E. KOEHLER

ANDREW J. SPORLEDER

OF COUNSEL

MARVIN J. SHARP

PATRICK A. BAUMHOER

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

June 24, 2002

Secretary of PSC
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: Consolidated Case No. TC-2002-57

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of Petitioners' Motion to Compel.

Thank you for seeing this filed.

Sincerely,


Lisa Cole Chase

LCC:tr

Enc.

cc: MITG Managers
PSC General Counsel
Office of Public Counsel
Paul S. DeFord
Leo J. Bub
Lisa Creighton Hendricks
Monica Barone

Larry W. Dority
Richard S. Brownlee, III
James F. Mauze/Thomas E. Pulliam
W.R. England, III/Brian T. McCarty
Joseph D. Murphy
Mark P. Johnson

Trenton Office
9th And Washington
Trenton, Missouri 64683
660-359-2244
Fax 660-359-2116

Springfield Office
1111 S. Glenstone
P.O. Box 4929
Springfield, Missouri 65808
417-864-6401
Fax 417-864-4967

Princeton Office
207 North Washington
Princeton, Missouri 64673
660-748-2244
Fax 660-748-4405

Smithville Office
119 E. Main Street
P.O. Box. 654
Smithville, Missouri 64089
816-532-3895
Fax 816-532-3899

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

| | | |
|---|---|----------------------|
| Northeast Missouri Rural Telephone Company |) | |
| And Modern Telecommunications Company, |) | |
| |) | |
| Petitioners, |) | |
| |) | |
| vs. |) | Case No. TC-2002-57 |
| |) | Case No. TC-2002-113 |
| Southwestern Bell Telephone Company, |) | Case No. TC-2002-114 |
| Southwestern Bell Wireless (Cingular), |) | Case No. TC-2002-167 |
| Voice Stream Wireless (Western Wireless) |) | Case No. TC-2002-181 |
| Aerial Communications, Inc., CMT Partners, |) | Case No. TC-2002-182 |
| (Verizon Wireless), Sprint Spectrum, LP, |) | Consolidated |
| United States Cellular Corp., and Ameritech |) | |
| Mobile Communications, Inc., et al. |) | |
| |) | |
| Respondents. |) | |

PETITIONER'S MOTION TO COMPEL

COMES NOW Petitioners, Mid-Missouri Telephone Company, Alma Telephone Company, Northeast Missouri Rural Telephone Company, Modern Telecommunications Company, MoKan Dial, Inc., and Chariton Valley Telephone Company, ("MITG Companies") and pursuant to 4 CSR 240-2.090(8), hereby request the Missouri Public Service Commission ("Commission") to order and compel Ameritech Wireless Communications, Inc., Ameritech Cellular, CMT Partners, and Verizon Wireless (collectively "Respondents") to respond to certain data requests and requests for admission served on them by the MITG Companies. In support of this Motion to Compel, the MITG Companies state as follows:

1. On November 26, 2001, the MITG Companies served data requests and requests for admission upon Respondents.

2. On December 6, 2001, Respondents timely served their objections to certain of the data requests and requests for admission upon the MITG Companies.

3. Counsel for the MITG Companies and Respondent conferred and resolved some of the objections.

4. On May 30, 2002, pursuant to 4 CSR 240-2.090(8), counsel for the MITG Companies and counsel for Respondents participated in a telephone conference with Judge Thompson on outstanding objections not resolved between the parties.

5. For purposes of this motion the Commission should only consider data requests #23 and #24 of Petitioners Northeast, Modern, Chariton Valley and Mid-Missouri, #27 and #28 for Petitioners Alma and MoKan, and requests for admission #1, #2, #4, and #5 of all Petitioners. Said Data Requests are stated as follows:

DR #23: For interMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

DR #27: For interMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

DR #28: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

Requests for Admission #1:

Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

Request for Admission #2:

Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

Request for Admission #3:

Please admit that you have delivered to SWBT traffic originated by carriers other than your company.

(The Respondents have admitted. Request for Admission #3 is here only to place requests #4 and #5 into context.)

Request for Admission #4:

Please admit that, with respect to the traffic identified in Request for Admission #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

Request for Admission #5:

Please admit that, with respect to the traffic identified in Request for Admission # 3 , your company has paid to SWBT its charges for carrying such traffic.

6. Petitioners attach copies of Respondent's objections to these data requests and requests for admission which are attached to this Motion as Exhibit A, and are incorporated herein by reference.

7. The MITG Companies have sought information pertaining to whether Respondent bills the responsible IXC, for either inter- or intra-MTA traffic that is terminated by them for calls originated by a landline carrier.

The data requests #23 and #24 of Petitioners Northeast, Modern, Chariton Valley and Mid-Missouri, #27 and #28 for Petitioners Alma and MoKan, and requests for admission #1 and #2 for all Petitioners, concern whether Respondent is receiving access rate compensation for traffic terminated on their network by an IXC. These requests are relevant because they would determine whether the Respondents are billing access rates on similar traffic for which they seek to deny the MITG Companies. When Southwestern Bell Telephone Company delivers traffic to the MITG networks, it does so in its IXC capacity. The wireless carriers, including the Respondents, have taken the position that the MITG Companies cannot charge access rates for termination of Respondents wireless traffic.

8. The requests for admission #4 and #5 ask Respondents to admit they have received compensation for transporting the traffic of those other carriers, and that Respondents pay SWBT compensation for the charges SWBT incurs in taking and handling such traffic.

Based on prior proceedings and testimony related to this issue, SWBT and Respondents have taken the position that the MITG may only bill the originating carrier for traffic terminated on their networks. Admissions to Request for Admissions #4 and #5 would be an admission that SWBT and Respondents, who are paid as transport carriers, do not follow the

“bill-the-originating-carrier” business relationship, but in fact reflects a “bill-the-transporting-carrier” relationship, which is exactly the business relationship the MITG Petitioners believe is most appropriate – the MITG billing the transport carrier that transits calls to their networks, i.e. SWBT.

9. For the foregoing reasons, the data requests and requests for admission which the MITG Companies seek to compel are relevant, material and reasonably calculated to lead to the discovery of information that will be determinative in the present cases.

WHEREFORE, Petitioners, the MITG Companies, respectfully requests that the Commission order and compel Respondent to answer data requests #23 and #24 of Petitioners Northeast, Modern, Chariton Valley and Mid-Missouri, #27 and #28 for Petitioners Alma and MoKan, and requests for admission #1, #2, #4, and #5 of all Petitioners, as contained in Exhibit A.

Respectfully Submitted,

**ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.**

By 

Craig S. Johnson MO Bar No. 28179
Lisa Cole Chase MO Bar No. 51502
The Col. Darwin Marmaduke House
700 East Capitol
P.O. Box 1438
Jefferson City, MO 65102
Telephone: (573) 634-3422
Facsimile: (573) 634-7822
Email: Cjohnson@AEMPB.com
Email: lisachase@AEMPB.com

ATTORNEYS FOR PETITIONERS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 24th day of June, 2002, to all attorneys of record in this proceeding.



Lisa Cole Chase Mo Bar No. 51502

EXHIBIT A

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Northeast Missouri Rural Telephone Company)
and Modern Telecommunications Company,)
 Petitioners,)
)

vs.)

Case No. TC-2002-57

Southwestern Bell Telephone Company,)
Southwestern Bell Wireless (Cingular),)
Voicestream Wireless (Western Wireless))
Aerial Communications, Inc., CMT Partners)
(Verizon Wireless), Sprint Spectrum LP,)
United States Cellular, Ameritech Mobile)
Communications, Inc.)

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**


COMES NOW CMT Partners (Verizon Wireless) ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner Modern Telecommunications Company received by Respondent on November 26, 2001:

DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.



DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauzé@email.msn.com

Attorneys for Respondent CMT Partners
(Verizon Wireless)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Northeast Missouri Rural Telephone Company)
and Modern Telecommunications Company,)
 Petitioners,)
)

vs.)

Case No. TC-2002-57

)
Southwestern Bell Telephone Company,)
Southwestern Bell Wireless (Cingular),)
Voicestream Wireless (Western Wireless))
Aerial Communications, Inc., CMT Partners)
(Verizon Wireless), Sprint Spectrum LP,)
United States Cellular, Ameritech Mobile)
Communications, Inc.)

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW CMT Partners (Verizon Wireless) ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner Northeast Missouri Rural Telephone Company received by Respondent on November 26, 2001:

DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

Objection to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauzé@email.msn.com

Attorneys for Respondent CMT Partners
(Verizon Wireless)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| Alma Telephone Company, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-113 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobile System, Sprint |) | |
| Spectrum LP, United States Cellular Corp., |) | |
| Western Wireless, Aerial Communications, Inc., |) | |
| Voice Stream, CMT Partners (d/b/a Cellular One), |) | |
| Ameritech Cellular, Illinois Cellular |) | |
| Communications, and American Portable, |) | |
| Respondents |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS
FOR ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW CMT Partners (d/b/a Cellular One) ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

✓

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #23: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #24: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information

of the Respondent, as that term is defined in the Commission's standard protective order.

DR #25: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #26: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #27: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #28: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauze@email.msn.com

Attorneys for Respondent CMT Partners
(d/b/a Cellular One)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|---|---|-------------|
| Chariton Valley Telephone Corporation, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | TC-2002-167 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobile System, Alltel Wireless, |) | |
| Voice Stream, Sprint Spectrum, L.P., Ameritech |) | |
| Mobile Communications, Inc., CMT Partners, |) | |
| United States Cellular Corp., Aerial |) | |
| Communications, Inc., Nextel of Texas, Sprint |) | |
| PCS, Cybertel Missouri, and Northern Illinois |) | |
| Cellular, |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW CMT Partners ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;



- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

- DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

- DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauzé@email.msn.com

Attorneys for Respondent CMT Partners

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| Mid-Missouri Telephone Company, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-114 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobil, LLC d/b/a Cingular, |) | |
| Sprint Spectrum, L.P., CMT Partners, and |) | |
| Ameritech Mobile |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW CMT Partners ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250

other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam
James F. Mauzé, Esq. #18684
Thomas E. Pulliam, Esq. #31036
112 South Hanley Road
St. Louis, Missouri 63105-3418
Telephone: (314) 726-2800
Facsimile: (314) 863-3821
E-Mail: jfmauze@email.msn.com

Attorneys for Respondent CMT Partners

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| MoKan Dial, Inc., |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-182 |
| |) | |
| Sprint Missouri, Inc., Southwestern Bell |) | |
| Telephone Company, Sprint PCS, |) | |
| Southwestern Bell Mobile System, Voice |) | |
| Stream Wireless, Inc., AT&T Wireless, |) | |
| United States Cellular Corp., Nextel of |) | |
| Texas, Verizon Wireless, and Ameritech |) | |
| Mobile Communications, |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS
FOR ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Verizon Wireless ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

✓ DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.



OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #6: For each interconnection agreement you have had in effect since 1996, please state:
- a. Missouri Public Service Commission docket number in which approval was obtained;
 - b. Its effective date;
 - c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
 - d. Its termination date;
 - e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #23: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

- DR #24: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information

of the Respondent, as that term is defined in the Commission's standard protective order.

DR #25: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #26: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #27: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #28: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauzé@email.msn.com

Attorneys for Respondent Verizon Wireless

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| Mid-Missouri Telephone Company, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-114 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobil, LLC d/b/a Cingular, |) | |
| Sprint Spectrum, L.P., CMT Partners, and |) | |
| Ameritech Mobile |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Ameritech Mobile Communications, Inc. ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250

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Respectfully submitted,

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By: Thomas E. Pulliam

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Telephone: (314) 726-2800
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Attorneys for Respondent Ameritech Mobile
Communications, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
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700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|---|---|-------------|
| Chariton Valley Telephone Corporation, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | TC-2002-167 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobile System, Alltel Wireless, |) | |
| Voice Stream, Sprint Spectrum, L.P., Ameritech |) | |
| Mobile Communications, Inc., CMT Partners, |) | |
| United States Cellular Corp., Aerial |) | |
| Communications, Inc., Nextel of Texas, Sprint |) | |
| PCS, Cybertel Missouri, and Northern Illinois |) | |
| Cellular, |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Ameritech Mobile Communications, Inc. ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
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OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

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Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

Telephone: (314) 726-2800

Facsimile: (314) 863-3821

E-Mail: jfmauze@email.msn.com

Attorneys for Respondent Ameritech Mobile
Communications, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Northeast Missouri Rural Telephone Company)
and Modern Telecommunications Company,)
Petitioners,)

vs.)

Case No. TC-2002-57

Southwestern Bell Telephone Company,)
Southwestern Bell Wireless (Cingular),)
Voicestream Wireless (Western Wireless))
Aerial Communications, Inc., CMT Partners)
(Verizon Wireless), Sprint Spectrum LP,)
United States Cellular, Ameritech Mobile)
Communications, Inc.)

**OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR
ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Ameritech Mobile Communications, Inc. ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner Modern Telecommunications Company received by Respondent on November 26, 2001:

J DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

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| St. Louis, Missouri 63105-3418 | |
| Telephone: (314) 726-2800 | |
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Attorneys for Respondent Ameritech Mobile
Communications, Inc.

CERTIFICATE OF SERVICE

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P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

Northeast Missouri Rural Telephone Company)
and Modern Telecommunications Company,)
Petitioners,)

Case No. TC-2002-57

OBJECTIONS TO DATA REQUESTS AND REQUESTS FOR ADMISSIONS, AND REQUEST FOR ADDITIONAL TIME TO ANSWER

JDR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #21: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #22: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #23: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #24: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: *Thomas E. Pulliam*

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| James F. Mauzé, Esq. | #18684 |
| Thomas E. Pulliam, Esq. | #31036 |
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| Facsimile: (314) 863-3821 | |
| E-Mail: jfmauze@email.msn.com | |

Attorneys for Respondent Ameritech Mobile
Communications, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 6th day of December, 2001, to:

Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| MoKan Dial, Inc., |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-182 |
| |) | |
| Sprint Missouri, Inc., Southwestern Bell |) | |
| Telephone Company, Sprint PCS, |) | |
| Southwestern Bell Mobile System, Voice |) | |
| Stream Wireless, Inc., AT&T Wireless, |) | |
| United States Cellular Corp., Nextel of |) | |
| Texas, Verizon Wireless, and Ameritech |) | |
| Mobile Communications, |) | |
| Respondents. |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS
FOR ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Ameritech Mobile Communications, Inc. ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

✓ DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #6: For each interconnection agreement you have had in effect since 1996, please state:

- a. Missouri Public Service Commission docket number in which approval was obtained;
- b. Its effective date;
- c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
- d. Its termination date;
- e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

DR #23: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #24: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information

of the Respondent, as that term is defined in the Commission's standard protective order.

DR #25: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #26: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #27: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #28: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

REQUESTS FOR ADMISSIONS

Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #5: Please admit that, with respect to the traffic identified in Request for Admissions #3, your company has paid to SWBT its charges for carrying such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

In addition, Respondent seeks additional time to file answers to the Data Requests and Requests for Admissions not objected to herein to and including December 31, 2001 because the individuals responsible for doing the work associated with preparing responses for these Data Requests and Requests for Admissions are also responsible for the responses to close to 250 other data requests and 50 other requests for admissions propounded by other ILECs in pending complaint cases.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

James F. Mauzé, Esq. #18684

Thomas E. Pulliam, Esq. #31036

112 South Hanley Road

St. Louis, Missouri 63105-3418

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Attorneys for Respondent Ameritech Mobile
Communications, Inc.

CERTIFICATE OF SERVICE

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Craig S. Johnson, Esq.
Andereck, Evans, Milne,
Peace & Johnson, LLC
700 East Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Thomas E. Pulliam

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

| | | |
|--|---|----------------------|
| Alma Telephone Company, |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. TC-2002-113 |
| |) | |
| Southwestern Bell Telephone Company, |) | |
| Southwestern Bell Mobile System, Sprint |) | |
| Spectrum LP, United States Cellular Corp., |) | |
| Western Wireless, Aerial Communications, Inc., |) | |
| Voice Stream, CMT Partners (d/b/a Cellular One), |) | |
| Ameritech Cellular, Illinois Cellular |) | |
| Communications, and American Portable, |) | |
| Respondents |) | |

**OBJECTIONS TO DATA REQUESTS AND REQUESTS
FOR ADMISSIONS, AND REQUEST
FOR ADDITIONAL TIME TO ANSWER**

COMES NOW Ameritech Cellular ("Respondent") and, pursuant to 4 CSR 240-2.090, hereby files the following objections to the Data Requests and Requests for Admissions of Petitioner received by Respondent on November 26, 2001:

DR #1: Please state whether prior to February 5, 1998 you delivered wireless traffic to SWBT pursuant to SWBT's tariff.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #3: Please state whether, prior to February 5, 1998, you delivered wireless traffic to SWBT pursuant to an interconnection agreement.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #5: Please state the number of interconnection agreements you have had approved in Missouri.

✓

OBJECTION: The information sought in this data request is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #6: For each interconnection agreement you have had in effect since 1996, please state:
- a. Missouri Public Service Commission docket number in which approval was obtained;
 - b. Its effective date;
 - c. The date you first began sending wireless traffic pursuant to that interconnection agreement;
 - d. Its termination date;
 - e. The last date you sent wireless traffic pursuant to that interconnection agreement.

OBJECTION to a: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to b: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

OBJECTION to d: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #7: Please produce a copy of each interconnection agreement identified in your answers to DR #6.

OBJECTION: The information sought by Petitioner is a matter of public record and is as equally available to Petitioner as it is to Respondent.

- DR #23: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

- DR #24: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement between February 5, 1998 and February 17, 2001.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information

of the Respondent, as that term is defined in the Commission's standard protective order.

DR #25: Please state the minutes of use for intraMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #26: Please state the minutes of use for interMTA traffic your company has delivered to SWBT pursuant to interconnection agreement after February 5, 1998 to the last billing period available prior to your response to this DR.

OBJECTION: This data request is oppressive, overly broad and burdensome. Further, the information sought by Petitioner is "highly confidential" information of the Respondent, as that term is defined in the Commission's standard protective order.

DR #27: For interMTA calls originated by a landline carrier, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

DR #28: For intraMTA calls originated by a landline caller, terminating to one of your CMRS customers, and which call is delivered to you by an interexchange carrier, do you bill that IXC terminating access compensation?

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

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Requests for Admissions #1: Please admit that, for interMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #2: Please admit that, for intraMTA traffic delivered to you for termination to your subscribers by an interexchange carrier (IXC) such as AT&T, you charge the IXC delivering such traffic your company's terminating access rate.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Admissions #4: Please admit that, with respect to the traffic identified in Request for Admissions #3, you have received compensation for your charges for carrying such traffic from the carriers originating such traffic.

OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

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OBJECTION: Respondent objects to this data request on the grounds that it is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

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Respectfully submitted,

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Attorneys for Respondent Ameritech Cellular

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