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February 18, 2004

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PHIL HAUCK (1924-1991)

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

Re:

Case No. TC-2002-57

FILED

FEB 1 8 2004

SELVISED LINE

Mal

Dear Secretary:

Enclosed please find an original and eight (8) copies of Chariton Valley Telephone Corporation and Northeast Missouri Rural Telephone Company's Objection To SprintPCS's Data Request 1.

Thank you for seeing that this is filed properly.

Sincerely,

Bryan D. Lade

Enc.

Cc:

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# BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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Northeast Missouri Rural Telephone Company And Modern Telecommunications Company,	FEB 1 8 2004	
Petitioners,	) Service Commission	
v.	Case No. TC-2002-57, et al consolidated.	
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 Corp., and Ameritech	)	
Mobile Communications, Inc.,	)	
	)	
Respondents.	)	

## Chariton Valley Telephone Corporation and Northeast Missouri Rural Telephone Company's Objection To SprintPCS's Data Request 1

1. Please provide all billing records, individual call detail records, documentation, evaluation data, and any other analysis information used in formulating and developing the analysis labeled Schedule 4 to Mr. William Biere's Direct Testimony/Schedule 3 to Mr. Gary Godfrey's Testimony.

#### Objection:

Insofar as this data request asks for the raw switch data for the period utilized for these schedules, production by duplication of this data either in electronic format or printed copy would be unduly burdensome and unnecessarily hazardous to prudent operations. As described in the testimony and schedules, the sorts run against raw switch data for specific wireless carrier traffic resulted in the traffic described in the study. If Sprint PCS desires to view the raw switch

data, Chariton Valley and Northeast will produce such data at their premises where the integrity of the switch data and operations can be controlled and safeguarded.

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

By

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### ATTORNEYS FOR PETITIONERS

#### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 18th day of February, 2004, to all parties of record in this proceeding.

Attorney for Petinoners