### 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 MATTHEW M. KROHN 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

February 24, 2004

LANETTE R. GOOCH

SHAWN BATTAGLER

JOSEPH M. PAGE LISA C. CHASE

JUDITH E. KOEHLER

ANDREW J. SPORLEDER REBECCA L. SELLERS

JASON A. PAULSMEYER

BRYAN D. LADE

CONNIE J. BURROWS

OF COUNSEL

MARVIN L. SHARP

GREGORY C. STOCKARD (1904-1993)

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

FEB 2 4 2004

Misseuri Public Service Commission

Dear Secretary:

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

Thank you for seeing that this is filed properly.

Dugi Office Bryan D. Lade

Enc.

Cc:

Office of the Public Counsel

Mark Johnson Dan Menser Ron Williams Joe Murphy

Leo Bub

**PSC General Counsel** 

Lisa Creighton Hendricks

Larry Dority Paul Gardner

Bret Dublinske MITG Managers

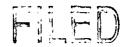
Trenton Office 9th And Washington Trenton, Missouri 64683 660-359-2244 Fax 660-359-2116

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 CTATE OF MISSOURI



Northeast Missouri Rural Telephone Company And Modern Telecommunications Company,	) FEB 2 4 2004
Petitioners,	) Missouri Public 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** 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.

Craig S. Johnson MO Bar No. 28179

Lisa Cole Chase MO Bar No. 51502

Bryan D. Lade MO Bar No. 55232

The Col. Darwin Marmaduke House

700 East Capitol

P.O. Box 1438

Jefferson City, MO 65102

Telephone: (573) 634-3422 Facsimile: (573) 634-7822

#### 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 Petitioners