

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Northeast Missouri Rural Telephone Company)	
and Modern Telecommunications Company, et al.)	
Petitioners,)	
)	
vs.)	Case No. TC-2002-57, et al.
)	
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.)	

MOTION TO COMPEL

COME NOW, Ameritech Mobile Communications, Inc., Ameritech Cellular, CMT Partners, and Verizon Wireless (collectively "Verizon Wireless") and, pursuant to 4 CSR 240-2.090(8), hereby request the Missouri Public Service Commission ("Commission") to order and compel Complainants Mid-Missouri Telephone Company, Alma Telephone Company, Northeast Missouri Rural Telephone Company, Modern Telecommunications Company, Mo-Kan Dial, Inc. and Chariton Valley Telephone Company (collectively "Complainants") to respond to certain data requests and requests for production of documents propounded upon them by Verizon Wireless. In support of this Motion to Compel, Verizon Wireless states as follows:

1. On May 2, 2002, Verizon Wireless served data requests and requests for production of documents upon each of the Complainants.

2. On or about May 10, 2002, Complainants timely served their objections to certain of the data requests and requests for productions of documents upon Verizon Wireless' counsel.

3. On May 30, 2002, pursuant to 4 CSR 240-2.090(8)(B), counsel for Complainants and counsel for Verizon Wireless participated in a telephone conference with Judge Thompson at which such time Judge Thompson entertained arguments from Verizon Wireless' counsel as to why the objections of Complainants should be overruled, and arguments from Complainants' counsel on why said objections should be sustained. The parties were unable to arrive at a mutually acceptable resolution of the discovery disputes during said telephone conversation.

4. The objections which Verizon Wireless seeks to overturn, and questions which Verizon Wireless seeks the commission to compel Complainants to respond, are attached to this Motion as Exhibit A, and by this reference made a part hereof.

5. The data requests and requests for production of documents which have been objected to by Complainants seek certain financial information of the Complainants brought into issue by Complainants through the direct testimony of Messrs. David Jones, Don Stowell and Oral Glasco.

6. At pages 17 and 18 of Mr. Jones' Direct Testimony filed on or about April 10, 2002, Mr. Jones alleges that as a result of the wireless carriers' failure to pay access rates to the Complainants for the termination of intra-MTA traffic upon the Complainants' respective networks, that the Complainants will have to shift collection of these revenues to its local customers. Verizon Wireless' Data Requests Nos. 21 through 25 each seek financial information which, because of the allegations made by Mr. Jones, Verizon Wireless is entitled to obtain

through the discovery process in order to substantiate Mr. Jones' claims concerning the impact of the Commission's failure to adopt the proposed solution upon Complainants' local customers. Mr. Jones' testimony has "opened the door" with respect to the type of information Verizon Wireless seeks (which, a review of the data requests will establish, is not onerous, burdensome or will require the expenditure of any material time for Complainants to compile), and if Mr. Jones desires to place the financial aspects of a decision by the Commission in issue (as he has done through his Direct Testimony) Verizon Wireless is certainly entitled to explore the underpinnings of those statements as well as other information which may tend to rebut Mr. Jones' statements.

7. In addition, certain of the Complainants have alleged financial distress regarding the failure of the wireless carriers to pay access (see Stowell Direct, p. 7, lines 10-11; Glasco Direct, p. 7, lines 3-5). The data requests to which Verizon Wireless seeks answers are nothing more than Verizon Wireless' attempt to explore background information concerning same.

8. These data requests do not constitute a "fishing expedition" or an abuse of the discovery process. Rather, these data requests and requests for production of documents represent clear, concise and limited attempts to gain access to information directly relevant to matters placed into issue by Complainants which Verizon Wireless would then be in a position to determine whether to present to the Commission in order to rebut the allegations made in the Direct Testimony of the Complainants. However, without access to the information, Verizon Wireless is in no position to be able to effectively explore the validity of such statements, much less formulate ways to rebut same.

WHEREFORE, Verizon Wireless respectfully requests the Commission to order and compel Complainants to answer each and every data request objected to, as set forth on Exhibit A, and produce the documents requested as set forth on Exhibit A.

Respectfully Submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

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Attorneys for Movants Ameritech Mobile
Communications, Inc., Ameritech Cellular,
CMT Partners and Verizon Wireless

CERTIFICATE OF SERVICE

The undersigned certifies that on this 12th day of June, 2002, a true and correct copy of the foregoing was faxed 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

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Respondents.)

**Objections of Mid-Missouri Telephone Company to May 2, 2002
Data Requests and Requests for Production of Documents from
Ameritech Mobile Communications Inc., and CMT Partners**

In addition to the specific objections set forth below, Petitioner reminds Respondent that, under the terms of Order of the Missouri Public Service Commission, Respondent was not to deliver to SWBT wireless traffic destined for Petitioner in the absence of an approved interconnection agreement. As Respondents' actions in violating that Order, and sending such traffic while failing to pay tariffed rates in effect, are the reasons this complaint was filed, it is suggested that the number, nature, and extent of Respondents' May 2 discovery requests are unreasonably burdensome. Wherever possible, Petitioner will exercise its right to produce business records pursuant to Rule 57.01(d).

First Set of Data Requests

4. Please list Petitioner's access rates in effect for the period February 1, 1998 to date, and the dates each rate was in effect.

Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

8. What are the total minutes of use for all carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use all carriers have made of Petitioner's network is not relevant to anything at issue in this proceeding.

9. Excluding wireless carriers, please identify the total minutes of use for which Petitioner has not received compensation from carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use for which Petitioner has not received compensation for is not relevant to anything at issue in this proceeding.

10. Please identify the approximate amount (in U.S. dollars) of the uncompensated minutes of use identified in your response to Data Request # 9.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the dollar amount of usage for which Petitioner has not received compensation for from all carriers is not relevant to anything at issue in this proceeding.

33. For each of the years 1998, 1999, 2000, and 2001, what are Petitioner's total or gross revenues?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the total amount of Petitioner's annual gross revenues is not relevant to anything at issue in this proceeding.

34. Since February 1, 1998, what has been Petitioner's authorized rate of return, as approved by the Missouri Public Service Commission? If Petitioner's authorized rate of return has changed since February 1, 1998, then please state the effective date of the change, Petitioner's authorized rate of return prior to the change, and Petitioner's authorized rate of return after the change.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's authorized rate of return is not relevant to anything at issue in this proceeding.

35. Excluding attorney's fees, please identify all expenditures Petitioner has made for equipment, personnel, telecommunications facilities, and any other items, and all expenses incurred by Petitioner, as a direct or indirect result of wireless traffic being terminated on Petitioner's network.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's expenditures made as a result of wireless traffic being terminated on Petitioner's network is not relevant to anything at issue in this proceeding.

36. For each item of expense or expenditure identified in Petitioner's response to Data Request #35, identify the amount of the expense or expenditure (in U.S. Dollars) and how the item of expense or expenditure is related to wireless traffic being terminated on Petitioner's network.

Objection: See objection to # 35.

38. How much revenue from the termination of wireless traffic was estimated in the construction of Petitioner's current rate design?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the amount of revenue from the termination of wireless traffic estimated in the construction of Petitioner's current rate design is not relevant to anything at issue in this proceeding.

Document Requests

5. Petitioner's audited financial statements (including, but not limited to, balance sheets, statements of income and expenses, statements of cash flow, and notes to statements) for fiscal years 1998, 1999, 2000 and 2001, and my unaudited financial statements for the year 2002. If audited financial statements were not prepared for one or more the requested years, then please provide unaudited financial statements.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the information contained in audited or unaudited financial statements of Petitioner is not relevant to anything at issue in this proceeding.

9. Petitioner's Missouri access tariff in effect on February 1, 1998, and all amendments thereto to date.

Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

10. All documents which Petitioner intends to use at the hearing.

Objection: The information of what documents Petitioner intends to use at hearing is work product information privileged from discovery.

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**ATTORNEYS FOR MID-MISSOURI
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Respondents.)

**Objections of Chariton Valley Telephone Corporation to May 2, 2002
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In addition to the specific objections set forth below, Petitioner reminds Respondent that, under the terms of Order of the Missouri Public Service Commission, Respondent was not to deliver to SWBT wireless traffic destined for Petitioner in the absence of an approved interconnection agreement. As Respondents' actions in violating that Order, and sending such traffic while failing to pay tariffed rates in effect, are the reasons this complaint was filed, it is suggested that the number, nature, and extent of Respondents' May 2 discovery requests are unreasonably burdensome. Wherever possible, Petitioner will exercise its right to produce business records pursuant to Rule 57.01(d).

First Set of Data Requests

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Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

8. What are the total minutes of use for all carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use all carriers have made of Petitioner's network is not relevant to anything at issue in this proceeding.

9. Excluding wireless carriers, please identify the total minutes of use for which Petitioner has not received compensation from carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use for which Petitioner has not received compensation for is not relevant to anything at issue in this proceeding.

10. Please identify the approximate amount (in U.S. dollars) of the uncompensated minutes of use identified in your response to Data Request #9.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the dollar amount of usage for which Petitioner has not received compensation for from all carriers is not relevant to anything at issue in this proceeding.

21. For each of the years 1998, 1999, 2000, and 2001, what are Petitioner's total or gross revenues?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the total amount of Petitioner's annual gross revenues is not relevant to anything at issue in this proceeding.

22. Since February 1, 1998, what has been Petitioner's authorized rate of return, as approved by the Missouri Public Service Commission? If Petitioner's authorized rate of return has changed since February 1, 1998, then please state the effective date of the change, Petitioner's authorized rate of return prior to the change, and Petitioner's authorized rate of return after the change.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's authorized rate of return is not relevant to anything at issue in this proceeding.

23. Excluding attorneys fees, please identify all expenditures Petitioner has made for equipment, personnel, telecommunications facilities, and any other items, and all expenses incurred by Petitioner, as a direct or indirect result of wireless traffic being terminated on Petitioner's network.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's expenditures made as a result of wireless traffic being terminated on Petitioner's network is not relevant to anything at issue in this proceeding.

24. For each item of expense or expenditure identified in Petitioner's response to Data Request #23, identify the amount of the expense or expenditure (in U.S. Dollars) and how the item of expense or expenditure is related to wireless traffic being terminated on Petitioner's network.

Objection: See objection to # 23.

25. How much revenue from the termination of wireless traffic was estimated in the construction of Petitioner's current rate design?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the amount of revenue from the termination of wireless traffic estimated in the construction of Petitioner's current rate design is not relevant to anything at issue in this proceeding.

Document Requests

5. Petitioner's audited financial statements (including, but not limited to, balance sheets, statements of income and expenses, statements of cash flow, and notes to statements) for fiscal years 1998, 1999, 2000 and 2001, and any unaudited financial statements for the year 2002. If audited financial statements were not prepared for one or more of the requested years, then please provide unaudited financial statements.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the information contained in audited or unaudited financial statements of Petitioner is not relevant to anything at issue in this proceeding.

9. Petitioner's Missouri access tariff in effect on February 1, 1998, and all amendments thereto to date.

Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

10. All documents which Petitioner intends to use at the hearing.

Objection: The information of what documents Petitioner intends to use at hearing is work product information privileged from discovery.

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Objections of MoKan Dial Inc. to May 2, 2002
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In addition to the specific objections set forth below, Petitioner reminds Respondent that, under the terms of Order of the Missouri Public Service Commission, Respondent was not to deliver to SWBT wireless traffic destined for Petitioner in the absence of an approved interconnection agreement. As Respondents' actions in violating that Order, and sending such traffic while failing to pay tariffed rates in effect, are the reasons this complaint was filed, it is suggested that the number, nature, and extent of Respondents' May 2 discovery requests are unreasonably burdensome. Wherever possible, Petitioner will exercise its right to produce business records pursuant to Rule 57.01(d).

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Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

8. What are the total minutes of use for all carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use all carriers have made of Petitioner's network is not relevant to anything at issue in this proceeding.

9. Excluding wireless carriers, please identify the total minutes of use for which Petitioner has not received compensation from carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use for which Petitioner has not received compensation for is not relevant to anything at issue in this proceeding.

10. Please identify the approximate amount (in U.S. dollars) of the uncompensated minutes of use identified in your response to Data Request #9.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the dollar amount of used for which Petitioner has not received compensation for from all carriers is not relevant to anything at issue in this proceeding.

19. For each of the years 1998, 1999, 2000, and 2001, what are Petitioner's total or gross revenues?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the total amount of Petitioner's annual gross revenues is not relevant to anything at issue in this proceeding.

20. Since February 1, 1998, what has been Petitioner's authorized rate of return, as approved by the Missouri Public Service Commission? If Petitioner's authorized rate of return has changed since February 1, 1998, please state the effective date of the change, Petitioner's authorized rate of return prior to the change, and Petitioner's authorized rate of return after the change.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's authorized rate of return is not relevant to anything at issue in this proceeding.

21. Excluding attorney's fees, please identify all expenditures Petitioner has made for equipment, personnel, telecommunications facilities, and any other items, and all expenses incurred by Petitioner, as a direct or indirect result of wireless traffic being terminated on Petitioner's network.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's expenditures made as a result of wireless traffic being terminated on Petitioner's network is not relevant to anything at issue in this proceeding.

22. For each item of expense or expenditure identified in Petitioner's response to Data Request #21, identify the amount of the expense or expenditure (in U.S. Dollars) and how the item of expense or expenditure is related to wireless traffic being terminated on Petitioner's network.

Objection: See objection to # 23.

23. How much revenue from the termination of wireless traffic was estimated in the construction of Petitioner's current rate design?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the amount of revenue from the termination of wireless traffic estimated in the construction of Petitioner's current rate design is not relevant to anything at issue in this proceeding.

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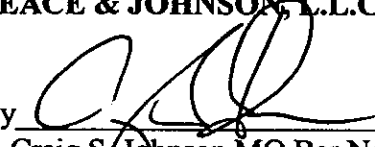
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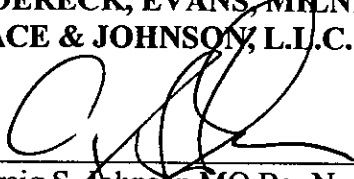
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22. Since February 1, 1998, what has been Petitioner's authorized rate of return, as approved by the Missouri Public Service Commission? If Petitioner's authorized rate of return has changed since February 1, 1998, then please state the effective date of the change, Petitioner's authorized rate of return prior to the change, and Petitioner's authorized rate of return after the change.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's authorized rate of return is not relevant to anything at issue in this proceeding.

23. Excluding attorneys fees, please identify all expenditures Petitioner has made for equipment, personnel, telecommunications facilities, and any other items, and all expenses incurred by Petitioner, as a direct or indirect result of wireless traffic being terminated on Petitioner's network.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's expenditures made as a result of wireless traffic being terminated on Petitioner's network is not relevant to anything at issue in this proceeding.

24. For each item of expense or expenditure identified in Petitioner's response to Data Request #23, identify the amount of the expense or expenditure (in U.S. Dollars) and how the item of expense or expenditure is related to wireless traffic being terminated on Petitioner's network.

Objection: See objection to # 23.

25. How much revenue from the termination of wireless traffic was estimated in the construction of Petitioner's current rate design?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the amount of revenue from the termination of wireless traffic estimated in the construction of Petitioner's current rate design is not relevant to anything at issue in this proceeding.

Document Requests

5. Petitioner's audited financial statements (including, but not limited to, balance sheets, statements of income and expenses, statements of cash flow, and notes to statements) for fiscal years 1998, 1999, 2000 and 2001, and any unaudited financial statements for the year 2002. If audited financial statements were not prepared for one or more of the requested years, then please provide unaudited financial statements.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the information contained in audited or unaudited financial statements of Petitioner is not relevant to anything at issue in this proceeding.

9. Petitioner's Missouri access tariff in effect on February 1, 1998, and all amendments thereto to date.

Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

10. All documents which Petitioner intends to use at the hearing.

Objection: The information of what documents Petitioner intends to use at hearing is work product information privileged from discovery.

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

By 

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**ATTORNEYS FOR MODERN
TELECOMMUNICATIONS COMPANY**

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

Northeast Missouri Rural Telephone Company,)
and Modern Telecommunications Company,)
et al.)

Petitioners,)

vs.)

Case No. TC-2002-57, et al.

Southwestern Bell Telephone Company,)
Southwestern Bell Wireless (Cingular),)
Voice Stream Wireless (Western Wireless))
Aerial Communications, Inc., CMT Partners,)
(Verizon Wireless), Sprint Spectrum, LP,)
United States Cellular Corp., and Ameritech)
Mobile Communications, Inc., et al.)

Respondents.)

**Objections of Alma Telephone Company to May 2, 2002
Data Requests and Requests for Production of Documents from
Ameritech Mobile Communications Inc., and CMT Partners**

In addition to the specific objections set forth below, Petitioner reminds Respondent that, under the terms of Order of the Missouri Public Service Commission, Respondent was not to deliver to SWBT wireless traffic destined for Petitioner in the absence of an approved interconnection agreement. As Respondents' actions in violating that Order, and sending such traffic while failing to pay tariffed rates in effect, are the reasons this complaint was filed, it is suggested that the number, nature, and extent of Respondents' May 2 discovery requests are unreasonably burdensome. Wherever possible, Petitioner will exercise its right to produce business records pursuant to Rule 57.01(d).

First Set of Data Requests

4. Please list Petitioner's access rates in effect for the period February 1, 1998, to date, and the dates each rate was in effect.

Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

8. What are the total minutes of use for all carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use all carriers have made of Petitioner's network is not relevant to anything at issue in this proceeding.

9. Excluding wireless carriers, please identify the total minutes of use for which Petitioner has not received compensation from carriers using or otherwise utilizing Petitioner's network for the period February 1, 1998 through December 31, 2001.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the total minutes of use for which Petitioner has not received compensation for is not relevant to anything at issue in this proceeding.

10. Please identify the approximate amount (in U.S. dollars) of the uncompensated minutes of use identified in your response to Data Request #9.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence as the dollar amount of usaged for which Petitioner has not received compensation for from all carriers is not relevant to anything at issue in this proceeding.

19. For each of the years 1998, 1999, 2000, and 2001, what are Petitioner's total or gross revenues?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the total amount of Petitioner's annual gross revenues is not relevant to anything at issue in this proceeding.

20. Since February 1, 1998, what has been Petitioner's authorized rate of return, as approved by the Missouri Public Service Commission? If Petitioner's authorized rate of return has changed since February 1, 1998, then please state the effective date of the change, Petitioner's authorized rate of return prior to the change, and Petitioner's authorized rate of return after the change.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as Petitioner's authorized rate of reutrn is not relevant to anything at issue in this proceeding.

21. Excluding attorneys fees, please identify all expenditures Petitioner has made for equipment, personnel, telecommunications facilities, and any other items, and all expenses incurred by Petitioner, as a direct or indirect result of wireless traffic being terminated on Petitioner's network.

Objection: This request is not reasonably calculated to lead ot the discovery of admissible evidence, as Petitioner's expenditures made as a result of wireless traffic beting terminated on Petitioner's network is not relevant to anything at issue in this proceeding.

22. For each item of expense or expenditure identified in Petitioner's response to Data Request #21, identify the amount of the expense or expenditure (in U.S. Dollars) and how the item of expense or expenditure is related to wireless traffic being terminated on Petitioner's network.

Objection: See objection to # 23.

23. How much revenue from the termination of wireless traffic was estimated in the construction of Petitioner's current rate design?

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the amount of revenue from the termination of wireless traffic estimated in the construction of Petitioner's current rate design is not relevant to anything at issue in this proceeding.

Document Requests

5. Petitioner's audited financial statements (including, but not limited to, balance sheets, statements of income and expenses, statements of cash flow, and notes to statements) for fiscal years 1998, 1999, 2000, and 2001, and any unaudited financial statements for the year 2002. If audited financial statements were not prepared for one or more of the requested years, then please provide unaudited financial statements.

Objection: This request is not reasonably calculated to lead to the discovery of admissible evidence, as the information contained in audited or unaudited financial statements of Petitioner is not relevant to anything at issue in this proceeding.

9. Petitioner's Missouri access tariff in effect on February 1, 1998, and all amendments thereto to date.

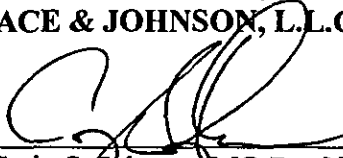
Objection: Petitioner's access rates are tariffed. The tariffs reflecting rates and dates are a matter of public record available to Respondent.

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Objection: The information of what documents Petitioner intends to use at hearing is work product information privileged from discovery.

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