

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE PETITION
OF BROOKINGS MUNICIPAL
UTILITIES D/B/A SWIFTEL
COMMUNICATIONS FOR
SUSPENSION OR MODIFICATION OF
DIALING PARITY, NUMBER
PORTABILITY AND RECIPROCAL
COMPENSATION OBLIGATION**

Docket No. TC07-007

**SPRINT'S SUPPLEMENTAL RESPONSES TO
BROOKINGS MUNICIPAL UTILITIES D/B/A
SWIFTEL COMMUNICATIONS DISCOVERY REQUESTS**

Sprint Communications Company L. P. ("Sprint"), by and through its attorneys, hereby submits the following objections and responses to the Interrogatories and Production of Documents propounded by Brookings Municipal Utilities d/b/a Swiftel Communications.

General Objections

Sprint makes the following general objections. Although specifically referred to in some of Sprint's responses, these general objections apply to each of the Interrogatories and are incorporated by reference into Sprint's response.

1. Sprint objects to the Interrogatories to the extent that they seek or call for information or documents protected by the attorney-client privilege, the attorney work product doctrine or any other applicable privilege or protection from disclosure.

2. Sprint objects to these Interrogatories insofar as they are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Interrogatories. Notwithstanding the foregoing objections, and without waiver thereof, Sprint will interpret the references to "agreements" as contained in these Interrogatories and Requests for Production of Documents to apply only to Sprint's interconnection agreements entered into under 47 U.S.C. Sections 251 and 252 in the state of South Dakota. To the extent any data request is intended to apply to agreements other than interconnection agreements entered into under 47 U.S.C. Sections 251 and 252 or to matters outside of South Dakota, Sprint objects to such data request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to these Interrogatories insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

4. Sprint objects to providing information to the extent that such information is already in the public record before the Commission or elsewhere.

5. Sprint objects to these Interrogatories to the extent that responding would be unduly burdensome, expensive, oppressive, or excessively time consuming.

6. Sprint objects to these requests to the extent that they are not relevant nor likely to lead to discovery of admissible evidence. The South Dakota Public Utilities Commission has previously ruled that statutory standards for suspension that involve economic impacts address the economic impact of the existing local exchange carrier and that company's customers or consumers. See Amended Final Decision and Order in Docket TC04-047. Economic considerations of potential competitors that may enter the market do not constitute relevant material and are not likely to lead to the discovery of relevant material.

7. Sprint Communications Company L.P. is a large corporation with employees located in numerous locations. In the course of business, these companies create countless documents that are not subject to Sprint or Federal Communications Commission ("FCC") retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint will conduct a search of those files that are reasonably expected to contain the requested information. To the extent the discovery requests purport to require more, Sprint objects on the grounds that compliance would impose an undue burden and expense.

8. Any responses will be provided subject to, and without waiver of, the foregoing objections. Sprint will make full or partial responses to the extent reasonably possible consistent with these objections.

INTERROGATORIES

Interrogatory 3: Identify each Telecommunications Carrier you have exchanged Telecommunications Traffic with, either directly or indirectly, during the past 12 months in South Dakota.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 2, 3, 4 and 5.

Supplemental Response to Interrogatory 3: Without waiving said objection, it is believed that Sprint has exchanged telecommunications traffic with most if not all South Dakota based telecommunications carriers either directly or indirectly pursuant to its CLEC operations in South Dakota Qwest area or as an IXC. As the question would call for review and a search of

every communications carrier, whether based in South Dakota or not, that might be exchanging traffic within South Dakota, such a search and verification would be overly broad and unduly burdensome.

Interrogatory 4: Identify all Sprint switches, interoffice transport routes, intercompany transmission facilities, points of interconnection with other carriers, and call record data collection points in the South Dakota LATA #640 and in MTA 12. Identify capacity and in-service plant associated with each switch, transport transmission equipment, route, and/or facility.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 3, 5 and 7.

Supplemental Response to Interrogatory 4: Sprint has a point of presence in Sioux Falls. Sprint is not requesting Swiftel in this proceeding or as part of the pending arbitration with Swiftel, TC06-176, that Swiftel carry traffic beyond its point of presence in Sioux Falls. Sprint's POP in Sioux Falls is connected to the SDN switch and Qwest switch.

Interrogatory 10: Identify any switch not owned by the Company that is directly or indirectly interconnected with any of your switches. Include the owner, status (affiliate or specified third parties, including local exchange Carriers, interexchange Carriers, and CMRS carriers), model, physical location, and date of interconnection for each such switch.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 2, 3 and 5.

Supplemental Response to Interrogatory 10: Sprint has no switch in South Dakota, but has a point of presence in Sioux Falls. The POP is connected directly to SDN's switch and Qwest's switch. Sprint is directly or indirectly interconnected with every other switch on the PSTN.

Interrogatory 46: At page 14-15 of his testimony, Mr. Farrar cites a number of state commission decisions concerning the delivery of traffic. Identify any of the cited state commission decisions that were suspension petition cases pursuant to Section 251(f)(2) of the Act.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 3 and 4.

Supplemental Response to Interrogatory 46: The cases cited were for the purpose of illustrating the determination that an originating carrier is responsible for delivering its traffic outside of its service area. Of the cases cited, according to the citation, the joint petition by TDS Telecom, noted as footnote 8, contained a request for suspension.

Interrogatory 55: Provide a list of all equipment and facilities in South Dakota which are 1) owned, 2) leased or 3) controlled by Sprint, including but not limited to switching equipment (Stored Program Control Class 5 and Class 4 switches including remote switches for these switches, Next Generation / Soft Switches including all servers or ancillary gateways, IP PBXs, analog PBXs), data routers / switches, and transport equipment (ATM, SONET,

MPLS, Frame Relay, IP, and wave division multiplexing) which are available for use to provide facilities-based competitive local and long distance voice service with MCC.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 3 and 5.

Supplemental Response to Interrogatory 55: See Supplemental Response to Interrogatories 4 and 10.

Interrogatory 56: Provide a list of all equipment and facilities in South Dakota which Sprint intends to use to provide facilities-based competitive local and long distance voice service with MCC, including but not limited to switching equipment (Stored Program Control Class 5 and Class 4 switches including remote switches for these switches, Next Generation / Soft Switches including all servers or ancillary gateways, IP PBXs, analog PBXs), data routers / switches, and transport equipment (ATM, SONET, MPLS, Frame Relay, IP, and wave division multiplexing).

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 2, 3 and 5.

Supplemental Response to Interrogatory 56: See Response to Interrogatories 4 and 10.

Interrogatory 57: Provide a list of the locations by street address of all equipment and facilities identified in Discovery Requests 55 and 56. These locations shall include but not be limited to locations of buildings, huts, collocation sites, and electronic equipment cabinets both pad and pole mounted.

RESPONSE: Sprint objects to this Interrogatory for reasons more specifically set forth in General Objections 2, 3 and 5.

Supplemental Response to Interrogatory 57: See Response to Interrogatories 4 and 10.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Request for Production 8: Please provide copies of all your annual ETC certification filings for both wireline and wireless ETC made with the South Dakota Public Utilities Commission (SDPUC) since January 1, 2003 including any responses to or correspondence with SDPUC staff regarding the filings or information included in such filings.

RESPONSE: Sprint objects to this Production of Documents for reasons more specifically set forth in General Objections 2, 3, 4, 5 and 6.

Supplemental Response to Request for Production 8: The response to request for production number 8 is “none.”

Request for Production 11: Provide a copy of a trunk diagram for traffic routed between Sprint and Swiftel showing how all traffic types are routed between Sprint and Swiftel.

Request for Production 15: Provide all agreements between Sprint including its affiliates or MCC including its affiliates with other third parties that are required to implement the delivery of services as outlined in its Petition requesting arbitration.

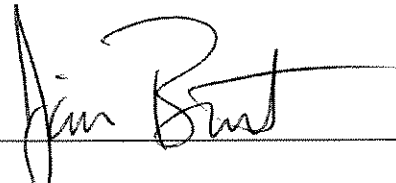
RESPONSE: Sprint objects to this Production of Documents for reasons more specifically set forth in General Objections 2, 3 and 5.

Request for Production 17: Provide a copy of all annual filings made with the SD PUC for the past 5 years.

RESPONSE: Sprint objects to this Production of Documents for reasons more specifically set forth in General Objections 2, 3, 4 and 5.

Supplemental Response to Request for Production 17: See attached List of Dockets involving Sprint.

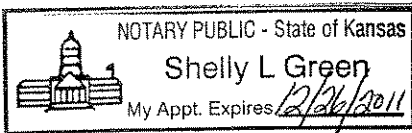
Dated this 24th day of July, 2008.



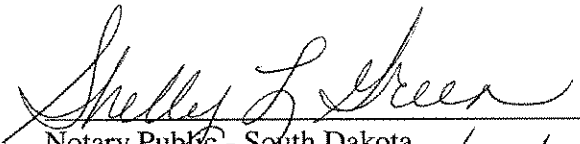
Jim Burt
Director of Policy

STATE OF Kansas)
) SS
COUNTY OF Johnson)


On this the 24th day of July, 2008, before me, the undersigned officer, personally appeared **JIM BURT**, known to me to be the person whose name is subscribed upon the foregoing document, and acknowledged before me under oath that the matters therein contained are true and correct to the best of his knowledge, information and belief.



(SEAL)


Notary Public - South Dakota
My Commission Expires: 12/26/2011

AS TO OBJECTIONS:


Talbot Wiczorek
Gunderson, Palmer, Nelson & Ashmore, LLP

ATTORNEYS FOR
SPRINT COMMUNICATIONS COMPANY, L.P.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 24 day of July, 2008, a copy of **Sprint's Supplemental Responses to Swiftel's Discovery Requests** was served electronically to

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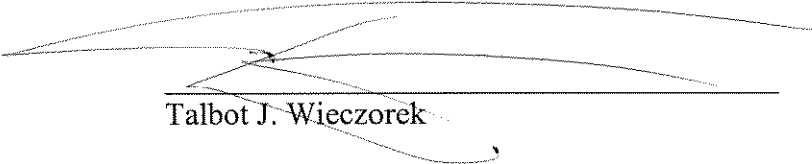
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