

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

IN THE MATTER OF THE COMPLAINT)
OF SOUTH DAKOTA NETWORK, LLC,)
AGAINST SPRINT COMMUNICATIONS)
COMPANY LP)

DOCKET NUMBER TC 09-098

IN THE MATTER OF THE THIRD)
PARTY COMPLAINT OF SPRINT)
COMMUNICATIONS COMPANY L.P.)
AGAINST SPLITROCK PROPERTIES,)
INC., NORTHERN VALLEY)
COMMUNICATIONS, INC., SANCOM,)
INC., AND CAPITAL TELEPHONE)
COMPANY)

**AFFIDAVIT OF
KARINE M. HELLWIG**

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

KARINE M. HELLWIG, being duly sworn under oath, states and alleges as follows:

1. I am a Manager of Regulatory Reporting for Sprint Communications Company L.P. and have personal knowledge of Sprint's long distance minute and revenue information availability and retention practices.

2. I make this affidavit in opposition to Northern Valley's Motion to Compel.

3. I have reviewed Northern Valley's Interrogatory No. 7. Sprint does not maintain the information requested in the form requested by Northern Valley.

4. Sprint's long distance services are billed and tracked based on the origination point of the service. Sprint does not maintain minutes of use or revenue information for its long distance services by termination points. To provide any of this information, Sprint would have to extract it from its records. The level of effort for Sprint to extract termination minutes and revenue information by geographic area would be significant both in effort and costs.

5. The period length of this data request runs back more than six years. Sprint has an active database against which it may be able to run queries on minutes of use going back six months, but obtaining terminating minutes of use by geography for any longer period would require turning either to archived material no longer stored in the active database or to call detail records. For the archived material, unarchiving this amount of detailed information is time consuming and would force Sprint to incur unexpected information technology costs. Additionally, given Sprint's current resource contracts, additional labor costs may be incurred by Sprint in order to complete such a task. Moreover, the archives for the minute of use database themselves only go back an additional seven months, totaling 13 months of available minute data, and, thus, would be insufficient to complete the inquiry. If call detail records were used instead, extracting minutes of use to a geographical area from billions of records of individual customers would require not only work but substantial amounts of expensive, computer time. Moreover, the call detail records themselves are archived after approximately 18 months to two years, and would have to be unarchived to complete the request.

6. As for revenues, that calculation would be even more difficult than the calculation on minutes of use. Sprint does not maintain revenue information by terminating location or number. In order to attempt to associate revenue with terminating location, after determining the minutes of use terminating to the identified numbers, Sprint would have to determine which of those minutes were associated with particular customers, which calling plans those customers were on at each point in time, and the relevant rates. The bulk of Sprint's retail customers are on unlimited plans from whom Sprint derives no revenue for each minute of use, much less minutes to particular termination points. Other customers are on plans in which they receive a certain number of minutes "in plan" and then pay only for minutes above that amount. For these

customers, Sprint would need to determine which ones exceeded their plan minutes and how much of their charges should be allocated to South Dakota. Still others are billed per minute rates, which may have varied over time. Attempting to determine what revenues were associated with calls terminating to specific South Dakota numbers for any time period, much less a period of more than six years, would thus be an extremely complicated and burdensome task that would have to be performed individually for all 3 million customers for each month covered in this data request.

FURTHER Affiant sayeth naught.

Karine M. Hellwig

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Subscribed and sworn to before me
this 22 day of February, 2012.

Jeffrey Todd Clapp

Notary Public

