



- a. CCCs did not receive local exchange services;
- b. CCCs were not legitimate end user customers, but were instead business partners;
- c. CCCs did not maintain premises; and/or
- d. An application of the *Farmers II* test shows these were not traditional carrier/customer relationships as contemplated for the application of access charges.

4) Northern Valley's intrastate access charges billed through August 1, 2011 do not apply to calls to Northern Valley's CCCs.

Sprint's Motion is based on Sprint's Response to Northern Valley's Statement of Facts, and Sprint's Affirmative Statement of Additional Facts, its Memorandum Opposing Northern Valley's Motion for Summary Judgment, and in Support of Its Motion for Summary Judgment, the Affidavits of Regina Roach and Don Wood, and all the files, records and proceedings herein.

Dated: August 31, 2012.

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