

James A. Overcash

From: Talbot J. Wiczorek [tjw@gpgnlaw.com]
Sent: Monday, January 08, 2007 3:19 PM
To: Meredith Moore; James A. Overcash; Kara.VanBockern@state.sd.us; Tom Moorman; Paul M. Schudel
Cc: Barone, Monica [LEG]; Browning, Diane C [GA]
Subject: Sprint discovery responses
Attachments: Verfication #1.pdf

Dear Counsel:

In reply to Ms. Moore's letter of last week and by way of supplementation of the discovery responses, Sprint provides the additional information. This information will be incorporated into an updated response that will be sent to you.

Supplemental responses to Interrogatory 20; Request for Admission 3 and Document Request 6

Interrogatory 20:

Subject to its general objections, Sprint responds as follows: With respect to switching and transport, the location of Sprint's switch is irrelevant as Sprint does not expect Interstate to deliver Interstate's originated traffic to Sprint's switch. Sprint will deliver its traffic to 1 POI on Interstate's network within the LATA. Sprint would expect Interstate to deliver Interstate's traffic to 1 POI on Sprint's network within the LATA which is Sprint's POP located at 1000 North Cliff Avenue, Sioux Falls, S.D. Notwithstanding the fact that the switch location is irrelevant, Sprint responds as follows: Sprint's switch is located in Kansas City.

Request for Admission 3:

Sprint objects to the term "individually negotiate" as vague. Sprint will respond as it understands this term. It is true that Sprint does not sit in one room with all cable companies present and fashion an agreement to cover all the companies. In this regard, please see Sprint's response to Request for Admission 4. Also, cable companies sign up for Sprint's services at different times, thus making group negotiations impossible.

Document Request No. 6:

TC06-188 – Sprint will provide a copy of its responses discovery requests in this proceeding as Interstate and Sprint are parties in this proceeding.

Also, attached is the signature page. I signed the first page to you as to objections and will sign this page when I send the supplemental responses. Let me know if you have any questions.

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EXHIBIT D

1/9/2007

VERIFICATION

That the undersigned Director - Policy for Sprint Nextel Corporation has read **SPRINT COMMUNICATIONS COMPANY L.P.'s RESPONSE TO INTERSTATE COMMUNICATIONS COOPERATIVE, INC.'S FIRST SET OF INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUESTS FOR ADMISSION** and knows the contents thereof and knows the same is true to his/her own knowledge, except for those matters stated therein upon information and belief, and as to those matters, believes them to be true.

BY:

TITLE:

Jim Burt
Director - Policy

AS TO OBJECTIONS

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