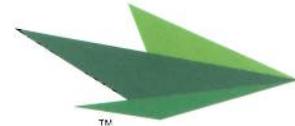


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EMBARQ™

Embarq Corporation
240 N. 3rd Street, Suite 201
Harrisburg, PA 17101
EMBARQ.com

July 2, 2009

VIA FIRST CLASS AND ELECTRONIC MAIL

Renardo L. Hicks, Esquire
Michael A. Gruin, Esquire
Stevens & Lee
17 North Second Street, 16th Floor
Harrisburg, PA 17101

Re: AT&T Communications of Pennsylvania, LLC TCG New Jersey, Inc. and TCG Pittsburgh, Inc. vs. Armstrong Telephone Company – Pennsylvania et al., Docket Nos. C-2009-2098380, C-2009-2099805, C-20098735

Dear Messrs. Hicks and Gruin:

Enclosed please find the First Set of Data Requests (“EQ-Sprint Set I”) propounded by The United Telephone Companies of Pennsylvania LLC *d/b/a* Embarq Pennsylvania (hereinafter, “Embarq PA”) to Sprint Communications Company, L.P., Nextel Communications of the Mid-Atlantic, Inc., and NPCR, Inc. (collectively, “Sprint Nextel” or “Sprint”) in the above-referenced case.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Sue Benedek

ZEB/jh
enclosures

cc: James J. McNulty, Secretary (*cover letter and certificate only*) (*via electronic filing*)
Service List (*via electronic and first class mail*)

Zsuzsanna E. Benedek
SENIOR COUNSEL
Voice: (717) 245-6346
Fax: (717) 236-1389

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

AT&T Communications of	:	
Pennsylvania, LLC	:	
Complainant	:	
v.	:	Docket No. C-2009-2098380, et al.
	:	
Armstrong Telephone Company -	:	
Pennsylvania, et al. ¹	:	
Respondents	:	
	:	
TCG New Jersey, Inc.	:	
Complainant	:	
v.	:	Docket No. C-2009-2099805, et al.
	:	
Armstrong Telephone Company -	:	
Pennsylvania, et al.	:	
Respondents	:	
	:	
TCG Pittsburgh, Inc.	:	
Complainant	:	
v.	:	Docket No. C-2009-2098735, et al.
	:	
Armstrong Telephone Company –	:	
Pennsylvania, et al.	:	
Respondents	:	

**EMBARQ’S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS PROPOUNDED UPON
SPRINT COMMUNICATIONS COMPANY, L.P., SPRINT SPECTRUM, L.P.,
NEXTEL COMMUNICATIONS OF THE MID-ATLANTIC, INC. AND NPCR, INC.
(COLLECTIVELY “SPRINT NEXTEL” OR “SPRINT”)**

¹ Respondents in each of the Complaints filed by AT&T, TCG New Jersey and TCG Pittsburgh include thirty two Pennsylvania rural incumbent local exchange carriers.

Pursuant to 52 Pa. Code §§ 5.321, 5.331, 5.341, 5.342 and 5.349, The United Telephone Company of Pennsylvania LLC d/b/a Embarq Pennsylvania (“United PA” or “Embarq PA”) propound the following Interrogatories and Requests for Production of Documents, Set I, upon the Sprint Communications Company, L.P., Sprint Spectrum, L.P., and Nextel Communications of the Mid-Atlantic, Inc. and NPCR, Inc. (collectively “Sprint”, “Sprint Nextel” or “Respondent”) to be answered by those officers, employees or agents of Respondent as may be cognizant of the requested information and who are authorized to answer on behalf of the Respondent.

INSTRUCTIONS

1. On each response, list the name and title of the person or persons who prepared the response or who is responsible for the information contained therein.
2. These Interrogatories and Requests for Production of Documents are deemed continuing. 52 Pa. Code § 5.332. Respondent is required to submit supplemental answers and/or documents to update, supplement, conform or correct any responses provided hereto.
3. If you object to any part of a question, answer all parts of such question to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.
4. Provide responses to each question as those responses are completed rather than wait for completion of responses to all questions.
5. The term “Sprint Nextel”, “Sprint” or “Respondent” as employed herein shall include the Sprint Communications Company L.P., Sprint Spectrum, L.P., and

Nextel Communications of the Mid-Atlantic, Inc., and NPCR, Inc. its experts, witnesses, employees, agents or representatives.

6. The term "United PA" or "Embarq PA" or "Embarq Pennsylvania" as employed herein shall refer to The United Telephone Company of Pennsylvania LLC d/b/a Embarq Pennsylvania, or any successor-in-name interest thereto.
7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.
8. The term "including" means "including, but not limited to."
9. The phrase "state the basis" shall mean identification and explanation of all sources, facts and assumptions relied upon in support of the claim, statement or conclusion.
10. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 4009 of the Pennsylvania Rules of Civil Procedure and includes both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of correspondence, letters, memoranda, notes, reports, directions, studies, investigations, calculations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations,

tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media.

**EMBARQ PA'S FIRST OF DATA REQUESTS PROPOUNDED UPON
SPRINT COMMUNICATIONS COMPANY, L.P., SPRINT SPECTRUM, L.P.,
NEXTEL COMMUNICATIONS OF THE MID-ATLANTIC, INC. AND NPCR,
INC. (COLLECTIVELY "SPRINT NEXTEL" OR "SPRINT")**

**DOCKET NOS. C-2009-2098380 ET AL.,
C-2009-209805 ET AL., AND C-2009-2098735 ET AL.**

- EQ-SP 1-1** Provide all documents, workpapers, studies and calculations used, reviewed, or relied upon for Direct Testimony.
- EQ-SP 1-2** Provide any and all studies, analyses, calculations, reports, and documents demonstrating compliance with 66 Pa.C.S. §3017(a) if intrastate switched access rates are reduced to interstate rates, or reduced to any other rate level proposed by Sprint in this docket.
- EQ-SP 1-3** Provide a detailed explanation of how, in Sprint's view, the provisions of 66 Pa.C.S. §1309(b) should be implemented by the Commission, including: (a) an explanation of what rates would be impacted; (b) an explanation of impact to the Pennsylvania USF; (c) an explanation of impact to Embarq PA's customers; and (d) an explanation of impact to Embarq PA. Provide all documents and calculations in support of the response.
- EQ-SP 1-4** Quantify and explain retroactive rate adjustment that Sprint expects to receive per Sprint's interpretation and application of the provisions of 66 Pa.C.S. §1309(b). Provide all documents in support.
- EQ-SP 1-5** Provide the time period that Sprint alleges the retroactivity of 66 Pa.C.S. §1309(b) applies. Explain the basis for Sprint's position.
- EQ-SP 1-6** Does any Sprint entity offer wireline local telephone service in Pennsylvania? If yes, please identify: (a) where in Pennsylvania; (b) which Sprint entity; and (c) identify the total number of customers served for each year, as of December 31, 2005 through December 31, 2008; and (d) provide a breakdown of total business and total residential customers served, for each year, as of December 31, 2005 through December 31, 2008.
- EQ-SP 1-7** Provide the total number of wireline Sprint long distance (IXC) customers, separately by total residential and total business customers, for each year, as of December 31, 2005 through December 31, 2008.

- EQ-SP 1-8** For each wireline Sprint long distance (IXC) product provided by Sprint in Pennsylvania, identify the number of customers subscribing to the product, separately identified, by residential and business customers (if segregated in that manner), for each year, as of December 31, 2005 through December 31, 2008.
- EQ-SP 1-9** For each year, 2005 through 2008, provide Sprint's annual originating and terminating intrastate switched access expense in Pennsylvania for each incumbent local exchange company (ILEC) operating in Pennsylvania, separately identified by ILEC. Provide the originating expense separate from the terminating expense. To the extent the response involves more than one Sprint entity, please provide the information by each entity.
- EQ-SP 1-10** For each month, from January 2005 through December 31, 2008, provide Sprint's monthly total originating and terminating intrastate switched access minutes of use (MOUs) associated with the access expenses in preceding request. Provide originating information separate from the terminating information. To the extent the response involves more than one Sprint entity, please provide the information by each entity.
- EQ-SP 1-11** Provide a list of all current (from January 1, 2005 through December 31, 2008) long distance calling plans, services, and products offered or provided by Sprint and exclusively available in Pennsylvania – i.e., long distance calling plans, services, and products which are not also available to Sprint's retail wireline customers in other states. To the extent the response involves more than one Sprint entity, please provide the information by each entity.
- EQ-SP 1-12** Provide copies of any current (from January 1, 2005 through December 31, 2008) advertising and marketing materials by or on behalf of Sprint for long distance services offered or provided by Sprint and exclusively available in Pennsylvania and not also available to Sprint's retail wireline customers in other states.
- EQ-SP 1-13** Provide a list of all current (from January 1, 2005 through December 31, 2008) wireless calling plans, services, and products offered or provided by Sprint and exclusively available in Pennsylvania – i.e., wireless calling plans, services, and products which are not also available to Sprint's retail wireless customers in other states.
- EQ-SP 1-14** Provide a list of all current (from January 1, 2005 through December 31, 2008) long distance calling plans, services, and

products offered or provided by Sprint on a stand-alone basis and exclusively available in Pennsylvania – i.e., long distance calling plans, services, and products which are not also available to Sprint's retail wireline customers in other states. For purposes of this question, stand-alone means a long distance plan, service or product that is not bundled by Sprint with any other service or product.

EQ-SP 1-15 For each plan, service and product listed in response to the proceeding discovery question: (a) provide a copy of or a hyperlink to the applicable tariff for such stand-alone long distance services; and (b) provide the total number of customer subscribing to such stand-alone long distance plans, services or product for year-end 2005, 2006 and 2007 and current.

EQ-SP 1-16 Provide a list of all current (from January 1, 2005 through December 31, 2008) bundled wireless plans, services, and products offered or provided by Sprint on a stand-alone basis and exclusively available in Pennsylvania i.e., bundled wireless plans, services, and products which are not also available to Sprint's retail wireless customers in other states. For purpose of this question, stand-alone means a long distance plan, service or product that is not bundled by Sprint with any other service or product.

EQ-SP 1-17 For each plan, service and product listed in response to the proceeding discovery questions: (a) provide a copy of (or a hyperlink to) the applicable tariff for each bundled wireless services; and (b) provide the total number of customers subscribing to such wireless bundled plans, services or products for year-end 2005, 2006, and 2007 and current.

EQ-SP 1-18 Identify each product or service introduced in Pennsylvania by Sprint (from January 1, 2005 through December 31, 2008) which is exclusively available in Pennsylvania but not also available to Sprint's retail wireless or wireline customers in other states.

EQ-SP 1-19 Provide all studies, calculations, and documents relied upon by Sprint demonstrating and quantifying how intrastate switched access reductions: (a) benefit consumers; and (b) benefit consumers in Pennsylvania.

EQ-SP 1-20 Provide all studies, calculations, and documents relied upon by Sprint demonstrating and quantifying how intrastate switched access reductions: (a) harm consumers; and (b) harm consumers in Pennsylvania.

- EQ-SP 1-21** Provide all elasticity studies, calculations, and documents undertaken by or on behalf Sprint in support of any claim or defense that Sprint alleges in this proceeding.
- EQ-SP 1-22** For each Sprint entity participating in this proceeding, provide a copy of any confidential reports filed with the Pennsylvania Public Utility Commission for each year from January 2005 to present.
- EQ-SP 1-23** Do any Sprint affiliates operating in Pennsylvania assess a charge, a surcharge, or a fee (e.g., an “In-State Access Recovery Fee”) applied to retail end-user customers related to the intrastate switched access charges paid by Sprint in Pennsylvania? If yes:
- a. On what date did Sprint begin assessing such a charge, surcharge, or fee? What is the name of the charge, surcharge, or fee?
 - b. Provide all tariff pages (tariff original, tariff modifications, and current tariff) or hyperlink to the tariffs of that such a charge, surcharge, or fee.
 - c. Is the charge, a surcharge, or a fee applied across the state of Pennsylvania? If not, where in Pennsylvania?
 - d. Identify which Sprint entities apply such a charge, a surcharge, or a fee in Pennsylvania?
 - e. Provide total annual revenues received by Sprint (from January 1, 2003 through December 31, 2008) for this charge, a surcharge, or a fee
- EQ-SP 1-24** Does Sprint have a partnership, joint venture, or affiliation with a cable provider that is operating in Embarq PA’s serving territories? If yes:
- a. Please list the names of all cable providers with which Sprint has such a partnership, joint venture or affiliation in Pennsylvania.
 - b. Explain in detail how Sprint is compensated for any services provided to, for, or on behalf of this a partnership, joint venture, or affiliate relationship.
 - c. Is any compensation between Sprint and that cable provider usage sensitive? If yes, explain.

- d. Explain in detail how Sprint is compensated for any intrastate switched access charges Sprint paid by Sprint.
- e. Provide from January 1, 2003 through December 31, 2008: (i) total intrastate switched access expense (actual or estimated) to Sprint associated any a partnership, joint venture, or affiliation with a cable provider that is operating in Embarq PA's serving territories; and (ii) total annual revenues received by Sprint relative to any a partnership, joint venture, or affiliation with a cable provider that is operating in Embarq PA's serving territories

- EQ-SP DR 1-25** Provide non-redacted copies of all Sprint Form 477 Reports filed with the FCC since January 2005.
- EQ-SP DR 1-26** From January 1, 2008 to present, provide a copy of all documents submitted or filed by Sprint to the FCC in the FCC's intercarrier compensation proceeding, *Unified Intercarrier Compensation*, at CC Docket No. 01-92.
- EQ-SP DR 1-27** Provide all studies, documents, cost studies, work papers and analysis support of the assertion that Embarq PA's access rates are excessive or high.
- EQ-SP DR 1-28** Is Sprint claiming or asserting that the determinations, actions, rate changes, or intrastate switched access rate levels are relevant or instructive in this proceeding?
- EQ-SP DR 1-29** From January 1, 2005 to present, has Sprint, or any affiliate of Sprint, increased intrastate switched access rates? If yes, identify: (a) the Sprint entity; (b) the state; (c) the date of any such rate increase; (d) the docket or tariff implementing the rate; (e) the rate before the increase and after the increase; and (f) provide corresponding interstate access rate paid by Sprint's affiliate in that state at the time of the intrastate switched access rate increase.

- end -

Norman J. Kennard, Esquire
Thomas, Long, Niesen and Kennard
212 Locust Street, Suite 500
Harrisburg, PA 17109

Joel Cheskis, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101

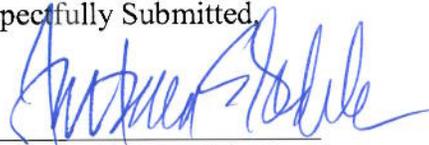
Benjamin Aron, Esquire
Sprint Nextel Corporation
2001 Edmund Halley Drive, 2nd Floor
Reston, VA 20191

Michelle Painter, Esquire
Painter Law Firm
13017 Dunhill Drive
Fairfax, VA 22030

Allison C. Kaster, Esquire
Adeoulu Bakare, Esquire
Office of Trial Staff
400 North Street, Second Floor
Harrisburg, PA 17120

Suzan D. Pavia, Esquire
Verizon Pennsylvania
1717 Arch Street
10th Floor
Philadelphia, PA 19103

Respectfully Submitted,



Zsuzsanna E. Benedek, Esquire
Attorney ID No. 60451
The United Telephone Company of Pennsylvania LLC
d/b/a Embarq Pennsylvania
240 North Third Street, Suite 201
Harrisburg, PA 17101
Direct Phone: (717) 245-6346
Fax: (717) 236-1389
E-Mail: sue.e.benedek@embarq.com