

STOKES
BARTHOLOMEW
EVANS & PETREE

A PROFESSIONAL ASSOCIATION

NASHVILLE • MEMPHIS • MUSIC ROW

424 CHURCH STREET, SUITE 2800
NASHVILLE, TENNESSEE 37219-2386
(615) 259-1450 • FAX: (615) 259-1470
www.stokesbartholomew.com

GUILFORD F. THORNTON, JR.
gthornton@stokesbartholomew.com

RECEIVED
JAN 17 PM 1:30
Direct Dial: 615/259-1492
Direct Fax: 615/687-1507

TN REGULATORY AUTHORITY
DOCKET ROOM

January 17, 2003

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Complaint of Aeneas Communications Against Citizens Communications in
Weakley County, Tennessee

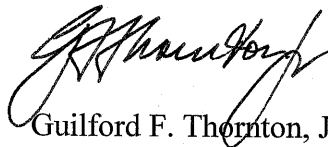
Docket No. 02-00438

Dear Chairman Kyle:

I am enclosing with this letter Citizens Telecommunications Company's first set of discovery requests for Sprint-United and Sprint. Copies have been served on counsel for all parties in this matter.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,



Guilford F. Thornton, Jr.

cc: Mike Swatts
Gregg Sayre

**BEFORE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: AENEAS Communications, LLC, Petitioner	)	
Against Citizens Communications	)	Docket No. 02-00438
Company of Tennessee, LLC, Respondent.	)	

**CITIZENS TELECOMMUNICATIONS COMPANY OF
TENNESSEE, LLC'S FIRST SET OF DISCOVERY
REQUESTS TO UNITED TELEPHONE-SOUTHEAST, INC. AND SPRINT
COMMUNICATIONS COMPANY L.P.**

Pursuant to TRA Rule 1220-1-2-.11, Citizens Telecommunications Company of Tennessee, LLC ("Citizens") is issuing these discovery requests to United Telephone - Southeast, Inc. ("Sprint-United") and Sprint Communications Company L.P. ("Sprint").

(a) If any response required by way of answer to these requests is considered to contain confidential or protected information, please furnish this information subject to the protective agreement executed by the parties in this docket.

(b) If any response required by way of answer to these requests is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.

(c) These requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(d) If any request cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a request, answer all parts of the request 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.

(e) These requests require supplemental responses consistent with the provisions of the Tennessee Rules of Civil Procedure.

DEFINITIONS

(a) “You” and “your” means Sprint-United and Sprint and any affiliated company providing telecommunications service in the State of Tennessee.

(b) “And” and “or” shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(c) “Identification” or “identify” when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(d) “Switch” means a device composed of hardware and/or software that establishes, manages and releases physical or virtual connections between two or more points in a voice or data transmission system, regardless of the technology employed (e.g., circuit, wireless,

packet, or IP telephony). A "switch" may also perform other functions that enhance the aforementioned connections by providing additional information to or about the parties or devices that are involved in the connections.

DISCOVERY REQUESTS

1. State all facts upon which you base your interest in the outcome of this proceeding or which otherwise support your petition to intervene.

RESPONSE:

2. State all facts and circumstances that you intend to assert in this proceeding that do not directly relate to the ability of customers of Aeneas Communications ("Aeneas") to connect with customers of Citizens in Weakley County, Tennessee or within Citizens' Dresden, Martin and/or Sharon exchanges.

RESPONSE:

3. Describe the types of services you provide in Weakley County, Tennessee or in areas connected by Extended Area Service ("EAS") routes with Citizens's customers in its Dresden, Martin and Sharon exchanges and the number of customers you serve within such areas..

RESPONSE:

4. If you contend in this proceeding that your customers have had dropped or uncompleted calls because of connectivity issues with Citizens, with respect to such dropped or uncompleted calls, please (a) identify all dropped or uncompleted calls, by time, date, caller (including telephone number), recipient or intended recipient (including telephone number), location of caller, location or recipient/intended recipient, type of call (e.g. voice, internet, other), and (b) state your understanding as to the reason for the dropped calls..

RESPONSE:

5. For each recipient or intended recipient identified in your response to request number 4, please state the volume of monthly volume of calls (by calls, minutes, amount of data, and any other measurement kept by you) received by that customer from Sprint-United and/or Sprint customer(s) in Weakley County, Tennessee or in an area connected by an EAS route to Citizens' customers in Citizens' Dresden, Martin or Sharon exchanges..

RESPONSE:

6. With respect to your customer(s) identified herein that have had calls dropped or uncompleted because of the connection with Citizens' customers, please state the frequency of such occurrence(s), including but not limited to a ratio of completed calls to uncompleted calls to each affected Sprint-United or Sprint customer.

RESPONSE:

7. Describe your interconnection arrangement(s) with other telecommunication providers in Tennessee, including a description of the contractual agreements and the type of connection/switch. Also, provide a copy of all agreements identified herein, including your agreement(s) with BellSouth.

RESPONSE:

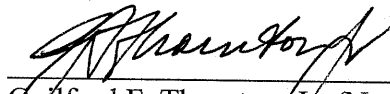
8. To the extent you have not already done so, please quantify the number of customers and monthly volume of calls (including number of calls, minutes, bytes of information, and any other measured quantity) affected by the manner in which calls are currently routed from Citizens' customers to your customers.

RESPONSE:

9. Please provide all documents that evidence or relate to your responses to the foregoing requests.

RESPONSE:

Respectfully submitted,



Guilford F. Thornton, Jr. (No. 14508)

Charles W. Cook, III (No. 14274)

STOKES BARTHOLOMEW

EVANS & PETREE, PA.

424 Church Street, Suite 2800

Nashville, Tennessee 37219

(615) 259-1450

Attorneys for Citizens Telecommunications
Company of Tennessee, LLC

CERTIFICATE OF SERVICE

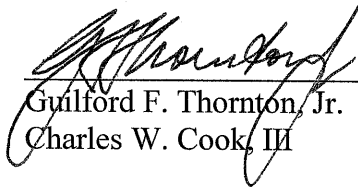
I hereby certify that a true and correct copy of the foregoing was served by facsimile transmission and by first class mail postage prepaid on the 17th day of January, 2003 to:

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219

Donald L. Scholes
Branstetter, Kilgore, Stranch & Jennings
227 Second Avenue North
Nashville, TN 37201

James B. Wright
United Telephone-Southeast, Inc.
14111 Capital Boulevard
Wake Forest, NC 27587

Jonathan Harlan
Aeneas Communications, LLC
301 South Church Street
Jackson, Tennessee 38031



Guilford F. Thornton, Jr.
Charles W. Cook, III