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February 21, 2006

Hon. Ron Jones, Chairman c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243

RE: Sprint Communications Company L.P. and Sprint Long Distance, Inc.'s Joint Application for Transfer of Customer Base, TRA Docket No. 06-00039

# Responses to Staff Data Request No. 1

Dear Chairman Jones:

On February 16, 2006, the Joint-Applicants, Sprint Communications Company L.P. and Sprint Long Distance, Inc., were served with TRA Data Request No. 1. According to the same, the responses thereto must be filed no later than February 24, 2006. In an effort to expedite this matter, the Joint-Applicants are hereby submitting their responses earlier than requested, as evidenced by the original and 13 copies attached hereto. Also, the Joint-Applicants respectfully request that this matter be considered at the Authority's March 6, 2006, Agenda Conference.

Please do not hesitate to contact me if you have any questions or require additional information concerning this matter.

Very truly yours.

clw

Attachments

cc: Edward Phillips

Bill Atkinson

# Tennessee Regulatory Authority, Docket No. 06-00039 Joint Application of Sprint Communications Company, L.P. and Sprint Long Distance, Inc. for Transfer of Customer Base TRA Data Request No. 1

#### Question 1:

Have the petitioners filed a similar petition with the FCC or other federal agency? If so, list any action taken and the associated file(s) or document number(s). If a schedule to complete the review of your petition has been established by any federal agency, provide such with your response.

## Response:

Both Sprint LP and LTD Long Distance have filed similar petitions in South Carolina and in Florida. At this time, it is the understanding of the Joint-Applicants that no petition for waiver of the FCC's slamming rule must be filed with the FCC. Rather, the FCC adopted a self-certification process in lieu of requiring the filing of waiver requests by affected companies. As a result, LTD Long Distance will follow the self-certification process set forth under 47 CFR § 64.1120(e). Moreover, the Joint-Applicants will ensure that the FCC self-certification will be filed no less than 30 days prior to the beginning of customer migration. Finally, Joint-Applicants will provide the Authority a copy of the FCC self-certification filing.

#### Question 2:

Provide the number of residential long distance customers served in the local exchange territory of United Telephone-Southeast, Inc. that Sprint Communications Company L.P. ("Sprint LP") currently has in Tennessee.

#### Response:

The numbers of residential customers served by Sprint LP in UTSE's local exchange territory are approximately 144,891.

### Question 3':

Will all Sprint LP residential long distance customers served in the local exchange territory of United Telephone-Southeast, Inc. be transferred to Sprint Long Distance, Inc. ("LTD Long Distance")?

#### Response:

It is anticipated that all Sprint LP residential customers served in UTSE's local exchange territory will be transferred to LTD Long Distance. However, there may be a very small number of residential customers that may be retained by Sprint LP because of out of territory billing issues and possibly those customers who have accumulated frequent flyer miles through

Supplemented / /2006

# Tennessee Regulatory Authority, Docket No. 06-00039 Joint Application of Sprint Communications Company, L.P. and Sprint Long Distance, Inc. for Transfer of Customer Base TRA Data Request No. 1

marketing offers provided by Sprint LP in years past. The Joint-Applicants are not able to ascertain this number, but anticipate it being a very small percentage of the residential customers in question.

## Question 4:

Provide a signed statement and/or verification from both Petitioners, attorneys, or their legal party representatives verifying that the information contained in the Joint Petition is true and correct to their best knowledge, information, and belief.

Response:

Please see the attached verifications.

#### **VERIFICATION**

I, Melvin J. Malone, hereby declare that I am Tennessee local counsel for Sprint Communications Company, L.P.; that I make this Verification for and on behalf of said Applicant and am authorized to do so, that I have read the Joint Application for Transfer of Customer Base filed with the Tennessee Regulatory Authority on February 14, 2006, and that the facts stated therein are true and correct to the best of my knowledge and belief.

Melvin J. Malone

Tennessee Logal Counsel – Sprint Communications

Company, L.P.

SWORN AND SUBSCRIBED before me this  $20^{1/2}$  day of February, 2006, at Nashville, Davidson County, Tennessee.

Muledith Myers Notary Public

My Commission Expires: \_

7/25/09

My Commission Expires JULY 25, 2009

# VERIFICATION

I, Craig T. Smith, hereby declare that I am an attorney of Sprint Long Distance, Inc.; that I make this Verification for and on behalf of said Applicant and am authorized to do so, that I have read the Joint Application for Transfer of Customer Base filed with the Tennessee Regulatory Authority on February 14, 2006, and that the facts stated therein are true and correct to the best of my knowledge and belief.

Sprint Long Distance, Inc.

SWORN AND S	UBSCRIBED be	fore me this <u>20</u>	L day of _	February	, 2006, at
2:38 om		<del></del>		,	

A NO	TARY PUBLIC — State of Kansas
-74	RHAMIEGLADE 9-12-08
	My Appt. Exp

My Commission Expires:

Rhamic Glade

Notary Public

State of Kansas

County of Johnson