

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 23, 2007

IN RE:

**PETITION OF THE TENNESSEE RURAL
INDEPENDENT COALITION FOR SUSPENSION AND
MODIFICATION PURSUANT TO 47 U.S.C 251(f)(2)**

)
)
)
)
)

**DOCKET NO.
06-00228**

ORDER GRANTING, IN PART, CMRS PROVIDERS' MOTION TO COMPEL

This matter is before the Hearing Officer upon the *CMRS Providers' Motion to Compel* ("*Motion to Compel*") filed with the Tennessee Regulatory Authority ("TRA" or "Authority") on April 9, 2007. In the *Motion to Compel*, the CMRS Providers¹ request that the TRA compel the Tennessee Rural Independent Coalition² ("Rural Coalition") to provide complete information responsive to Interrogatory Numbers 1, 2, 5(a) and 7, and documentation as requested in Request for Production of Documents Numbers 1, 2 and 7. A *Response to the CMRS Providers' Motion to Compel on Behalf of the Members of the Tennessee Rural Independent Coalition* ("*Response*") was filed on April 13, 2007.

¹ The CMRS Providers includes Cellco Partnership d/b/a Verizon Wireless, New Cingular Wireless PCS, LLC d/b/a Cingular Wireless (following the December 29, 2006 merger of AT&T, Inc. and BellSouth Corporation, Cingular Wireless became a wholly-owned indirect subsidiary of AT&T, Inc.), Sprint Spectrum L.P. d/b/a Sprint PCS, and T-Mobile USA, Inc. (collectively "CMRS Providers").

² The Tennessee Rural Independent Coalition includes the following rural local exchange carrier members: Ardmore Telephone Company, Ben Lomand Rural Telephone Cooperative, Inc., Bledsoe Telephone Cooperative, Century Telephone Enterprises, Inc. Companies consisting of CenturyTel of Adamsville, Inc., CenturyTel of Claiborne, Inc. and CenturyTel of Ooltewa-Collegedale, Dekalb Telephone Cooperative, Highland Telephone Cooperative, Loretto Telephone Company, Inc., Millington Telephone Company, North Central Telephone Cooperative, TDS Telecom Companies consisting of Concord Telephone Exchange, Inc., Humphreys County Telephone Company, and Tennessee Telephone Company, Inc., Twin Lakes Telephone Cooperative, United Telephone Company, and Yorkville Telephone Cooperative.

LEGAL FRAMEWORK

Pursuant to § 251(f)(2) of the Communications Act of 1934 (the “Act”),³ as amended, the Rural Coalition has requested relief from the Arbitration Order⁴ of the TRA requiring the development of a rate for the transport and termination of traffic based on TELRIC cost methodology. Section 251(f)(2) provides:

(2) Suspensions and modifications for rural carriers

A local exchange carrier with fewer than 2 percent of the Nation's subscriber lines installed in the aggregate nationwide may petition a State commission for a suspension or modification of the application of a requirement or requirements of subsection (b) or (c) of this section to telephone exchange service facilities specified in such petition. The State commission shall grant such petition to the extent that, and for such duration as, the State commission determines that such suspension or modification—

(A) is necessary--

- (i) to avoid a significant adverse economic impact on users of telecommunications services generally;
- (ii) to avoid imposing a requirement that is unduly economically burdensome; or
- (iii) to avoid imposing a requirement that is technically infeasible; and

(B) is consistent with the public interest, convenience, and necessity.⁵

The process of discovery in contested cases before the TRA is governed by the Tennessee Rules of Civil Procedure.⁶ According to Rule 26.02(1),

Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

³ 47 USC § 251(f)(2).

⁴ *Order of Arbitration Award*, TRA Docket No. 03-00585 (January 12, 2006).

⁵ 47 U.S.C.A. § 251.

⁶ *See* Tenn. Comp. R. & Regs. 1220-1-2-.11(1).

Further, the Tennessee Court of Appeals has commented on relevancy as follows:

Relevancy is extremely important at the discovery stage. However, it is more loosely construed during discovery than it is at trial. The phrase “relevant to the subject matter involved in the pending action” has been construed “broadly to encompass any matter that bears on or reasonably could lead to any other matter that could bear on, any issue that is or may be in the case.”⁷

Nevertheless, Tennessee’s rules governing discovery do provide some limitations and protections. Specifically, Tenn. R. Civ. P. 26.02(1) provides:

The frequency or extent of use of the discovery methods set forth in subdivision 26.01 shall be limited by the court if it determines that: (i) the discovery sought is unreasonably cumulative or duplicative or is obtainable from some other source that is more convenient, less burdensome or less expensive; (ii) the party seeking discovery has had ample opportunity by discovery in the action to obtain the information sought; or, (iii) the discovery is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the issues at stake in the litigation.

Additionally, Rule 26.03 permits a court to issue protective orders as justice requires.⁸ In *Duncan v. Duncan*, the Tennessee Court of Appeals held that:

A trial court should balance the competing interests and hardships involved when asked to limit discovery and should consider whether less burdensome means for acquiring the requested information are available. If the court decides to limit discovery, the reasonableness of its order will depend on the character of the information being sought, the issues involved, and the procedural posture of the case (citations omitted).⁹

While Rule 37.01(2) permits a party to file a motion to compel if a party fails to answer an interrogatory, including providing an evasive or incomplete answer, “[d]ecisions to grant a motion to compel rest in the trial court’s reasonable discretion.”¹⁰

⁷ *Boyd v. Comdata Network, Inc.*, 88 S.W.3d 203, 220 n.25 (Tenn. Ct. App. 2002) (citations omitted) (quoting *Oppenheimer Fund, Inc. v. Sanders*, 437 U.S. 340, 351, 98 S.Ct. 2380, 2389, 57 L.Ed.2d 253 (1978)).

⁸ Tenn. R. Civ. P. 26.02 & .03.

⁹ *Duncan v. Duncan*, 789 S.W.2d 557, 561 (Tenn. Ct. App. 1990).

¹⁰ *Kuehue & Nagel, Inc. v. Preston, Skahan & Smith International, Inc.*, 2002 WL 1389615, *5 n.4 (Tenn. Ct. App. June 27, 2002).

DISCOVERY REQUESTS & OBJECTIONS

Financial Information

Interrogatory Number 1:

Question: 1. For each Rural Coalition member, identify all affiliated entities (excluding individuals) (1) that hold an ownership interest in a Coalition member, or (2) that a Coalition member holds an ownership interest in.

Response: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory Number 2:

Question: 2. If not contained in the audited financial statements produced in response to Request for Production of Documents Number 1, identify the following for each Coalition member:

- a. After-tax earnings or “surplus” for the most recent three (3) years.
- b. Current book value of plant, equipment and other assets.
- c. Annual gross revenue for the most recent three (3) years.
- d. For the most recent three (3) years, equity (or “retained surplus”) as a proportion of the book value of equity and debt (i.e., return on equity).
- e. The effective corporate income tax rate.
- f. For the most recent three (3) years, annual cash-flow both before and after capital expenditures.

Response: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The past financial and operational results of each company are not factors in the determination of whether a Coalition member should be subject to a suspension of the Authority’s decision to utilize TELRIC cost studies to determine the rate for reciprocal compensation. Nor is the requested information relevant to the ultimate establishment of a rate for reciprocal compensation. As set forth, in Section 252(d)(2) of the Communications Act of 1934, as amended (“the Act”), the rate should be based on “a reasonable approximation of the additional costs of terminating such calls.” Moreover, the Act specifically does not “authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls” (Underscoring added).

Request for Production of Documents Number 1:

Request: For each Rural Coalition member, produce copies of the three (3) most recent audited financial statements containing Part 32 – Uniform System of Accounts level detail.

Response: The Petitioners each object to this request on the basis that the requested information is not relevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The past financial and operational results of each company are not factors in the determination of whether a Coalition member should be subject to a suspension of the Authority’s decision to utilize TELRIC cost studies to determine the rate for reciprocal compensation. Nor is the requested information relevant to the ultimate establishment of a rate for reciprocal compensation. As set forth, in Section 252(d)(2) of the Communications Act of 1934, as amended (“the Act”), the rate should be based on “a reasonable approximation of the additional costs of terminating such calls.” Moreover, the Act specifically does not “authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls.”

Request for Production of Documents Number 2:

Request: 2. Produce copies of all documents supporting the answers to Interrogatory Number 2.

Response: See Response to Interrogatory 2.

The discovery questions and requests noted above are designed to elicit information and documents pertaining to the financial resources of each of the members of the Rural Coalition. In the *Motion to Compel*, the CMRS Providers assert that this information is relevant and necessary to consideration of the Rural Coalition’s request for relief under the Act and their specific allegations.¹¹ The CMRS Providers contend that information regarding ownership and affiliation would provide some context for evaluating the burden the potential costs associated with a TELRIC study, and that theoretically the costs of such a study could be spread across the assets of Rural Coalition members owned or affiliated with multi-state telecommunications

¹¹ *Motion to Compel* at 4-5 (citing *Rural Coalition Petition for Suspension and Modification*, TRA Docket No. 06-00228 pg. 11 (June 23, 2006)).

corporations. The CMRS Providers assert “whether the cost associated with a TELRIC study constitutes an undue economic burden will depend, to some extent, on the resources of the company involved, and those responses will depend in part on the resources of the owner – a much larger organization.”¹²

Additionally, the CMRS Providers argue that the cost of the TELRIC study, standing alone, cannot provide a basis for the Rural Coalition’s claim that performing such a study would be unduly economically burdensome. Furthermore, that TRA precedent demonstrates that claims of economic burden are appropriately evaluated in light of “company specific data.”¹³ Along with financial information, the CMRS Providers request copies of the documents supporting such financial information, including audited financial statements for the most recent three years. In Docket No. 03-00585, the Rural Coalition produced audit financial statements through 2003 pursuant to the Authority’s Order to Compel issued in that docket.¹⁴ This current request would provide updated information which may be or become a consideration in the determination of this case.¹⁵

In the *Response*, the Rural Coalition argues that none of the disputed questions or requests is relevant to or has any bearing on the outcome of this proceeding. First, the Rural Coalition has the burden of proving that a suspension or modification of the requirement of performing a TELRIC cost study is necessary, as set out in the Act, and consistent with the public interest. As the burden rests on the Rural Coalition, it asserts that the discovery requests in dispute are inappropriate because “the CMRS Providers have sought information through discovery as if they carried the burden in this proceeding to demonstrate whether the overall

¹² *Motion to Compel* at 7.

¹³ *Id.* at 9.

¹⁴ See *Motion to Compel* at 14, referencing *Order Denying the Request for Reconsideration of ‘Order Granting Motion to Compel’ Issued June 17, 2004 by the Pre-Arbitration Officer*, TRA Docket 03-00585 (Feb. 14, 2005).

¹⁵ *Motion to Compel* at 14.

economic impact of the TELRIC requirement does or does not result in an unduly economic burden or adverse economic impact on telecommunications users.”¹⁶ In light of this, the Rural Coalition asserts that extensive discovery is unnecessary, and further, that the CMRS Providers’ discovery requests in question have no bearing on, nor could they lead to any other matter that could bear on, any issue that is or may be in the case.

Next, the Rural Coalition argues that financial information is not relevant to this suspension proceeding, “unless a Coalition member claims that hardship or lack of economic resources is the basis for the suspension request. No Coalition member has made any such claim.”¹⁷ The Rural Coalition further contends that “[t]he CMRS Providers’ assumption that proof of ‘undue economic burden’ requires a showing of financial distress is incorrect.”¹⁸ Finally, the Rural Coalition asserts that its members “have not and do not claim financial distress or that they cannot afford to pay for a TELRIC study.”¹⁹ Accordingly, the Rural Coalition contends that, as its members do not make or assert a claim of financial hardship, any request for financial information is irrelevant.

Finally, the Rural Coalition contends that the CMRS Providers have misapplied the decision of the United States Court of Appeals, Eighth Circuit, in the *Iowa Utilities Board v. FCC*.²⁰ The Rural Coalition asserts that in reliance on *Iowa Utilities Board*, the CMRS Providers erroneously “suggest that the Authority ‘must look to the whole of the economic burden the request imposes, not just a discrete part.’”²¹ This portion of the decision, the Rural Coalition asserts, refers to a request to remove a rural exemption under § 251(f)(1)(B) and not to

¹⁶ *Response* at 3

¹⁷ *Id.* at 7.

¹⁸ *Id.* at 8.

¹⁹ *Id.*

²⁰ *Iowa Utilities Bd. v. FCC*, 219 F.3d. 744 (8th Cir. 2000).

²¹ *Response* at 9, (citing *CMRS November 2, 2006 Response*, pg. 5 citing “*Iowa Utilities Board*, 219 F.3d. at 760-62.” (Underscoring added.)).

a request for a suspension under § 251(f)(2). Rather, the Rural Coalition avers that “[t]he *Iowa Utilities Board* decision makes clear that the rural carrier seeking suspension may rely on any aspect of the ‘whole of the economic burden’ imposed by the interconnection requirement from which the carrier seeks suspension.”

The Hearing Officer finds as correct the Rural Coalition statement: “[w]hether the costs of a TELRIC study and the associated rate-making proceeding constitute an undue economic burden or causes significant adverse economic impact on telecommunications user is a qualitative decision delegated to the TRA, and not to the sophistry of the CMRS Providers.”²² In light of this and the additional reasons which follow, the Hearing Officer finds that certain financial information is relevant and discoverable in this proceeding, and in fact, may be or become a component in the determination of undue economic burden.

Specifically, the CMRS Providers request for identification of the ownership interests of all affiliated entities in Interrogatory Number 1 is denied. Economic burden is specific to each company and, as such, any costs associated with conducting a study would be borne by that company. The Hearing Officer does not agree that “theoretically” the costs of a study could be passed to or spread over customers in other states. Accordingly, the request to compel such information is denied.

Regarding the financial information requested in Interrogatory Number 2 and Requests for Production of Documents Numbers 1 and 2, the Hearing Officer finds that such information may be or become a component in determining the issue of whether the performance of a TELRIC study is unduly economically burdensome. Thus, the information and documents requested in these discovery requests are within the scope of discovery and shall be provided.

²² *Id.* at 6.

Cost Studies

Interrogatory Number 5(a):

Question: 5. For CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed for the Coalition member or an Affiliate to support any Transport and Termination rate(s) that either the Coalition Member or an Affiliate has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.

Response: To the best of the Companies' knowledge, CenturyTel has never performed a TELRIC study in the development of a reciprocal compensation rate.

Request for Production of Documents Number 7:

Request: 7. Produce a copy of each cost study identified in response to interrogatory 5(a).

Response: See Response to Interrogatory 5.

In the *Motion to Compel*, the CMRS Providers take issue with and contend that CenturyTel's responses to the discovery requests recited above are incomplete because it limited its response to TELRIC studies alone. Whereas, the interrogatory asks for and contemplates a broad identification of cost studies performed by CenturyTel. In the *Response*, the Rural Coalition on behalf of CenturyTel asserts that any cost studies completed, other than a TELRIC study, is not relevant to this suspension of the requirement to utilize TELRIC proceeding. Additionally, cost studies from other states have no consequence to rate setting in Tennessee.

The Hearing Officer finds that, to some extent, both the arguments of the CMRS Providers and the Rural Coalition have merit. Specifically, while cost studies performed in other states or in any jurisdiction normally do not have application to Tennessee, identification of cost studies performed in Tennessee may be relevant in this case and, thus, do fall within the scope of discovery. Therefore, CenturyTel shall identify each cost study, as indicated in the interrogatory, to support any Transport and Termination rates it has sought to charge any interconnecting

Telecommunications Carrier in Tennessee, and produce copies thereof as requested in Request for Production of Documents Number 7.

Data Collection

Interrogatory Number 7:

This interrogatory is a four-column chart consisting of twenty questions to be answered either in the affirmative or negative, with no further explanation requested. Each row of column (A) lists the specific category of information being asked about. The heading of each additional column asks a specific yes-or-no question regarding each category listed in column (A). The heading in column (B) asks “Is This Information [referring to that which is listed in column (A)] Currently Available Within Your Records?” Column (C) inquires “If the Answer in (B) is No, Can This Information be Collected by Current Employee(s)?” The final column, (D), poses the question “If the Answer in columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?” See, *Exhibit A*, attached hereto for the illustration of the CMRS Providers’ interrogatory.

Response: The Petitioners each object to this request on the basis that the requested information is not relevant to the determination of whether the Authority should grant the requested suspension in accordance with Sec. 251(f)(2) of the Communication Act of 1934, as amended (the “Act”) in this proceeding. Accordingly, the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.

The interrogatory requests information that pertains to the accumulation of data that is essentially the first steps in performing a TELRIC cost study, the very requirement with respect to which the Petitioners each seek suspension. Moreover, the availability of the information identified in items 1 through 20 of this interrogatory are not even relevant to the statutory standard that governs the establishment of a rate for reciprocal compensation. As set forth, in Section 252(d)(2) of the Act, the rate should be based on “a reasonable approximation of the additional costs of terminating such calls.” Moreover, the Act specifically does not “authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of

transporting or terminating calls, or to require carriers to maintain records with respect to the additional costs of such calls” (Underscoring added).

With regard to the interrogatory noted above pertaining to the availability of certain data, the CMRS Providers contend that the question is asked “precisely because of the Coalition’s assertions . . . that production of a TELRIC study would be unduly economically burdensome because ‘[in some instances] the imposition of any such requirement would force members of the coalition to incur the burden of data collection and cost studies for the first time.’”²³ (substance added in brackets.) Further, as it has been raised in this case, whether and to what extent certain data may be readily obtained or collected, is an important component to the evaluation of a claim of undue economic burden in the preparation of a TELRIC cost study. Additionally, the interrogatory asks only about the availability of certain data and does not attach any request for production of that same data.

In the *Response*, the Rural Coalition asserts that *in some instances*, but not all, members of the Rural Coalition would be required to collect data and prepare a cost study for the first time if the suspension request is denied. As the first-time collection of data would apply only in some instances, a question that forces all members of the Rural Coalition to respond is not reasonable or relevant. Moreover, the Rural Coalition contends,

[w]hen each coalition member provides its offer of proof to sustain the suspension request each has made, the individual Petitioner will, if relevant to that Coalition member’s offer of proof, set forth the extent to which a requirement to perform a TELRIC study will force that company to incur the burden of data collection and cost studies for the first time. The CMRS Providers will have the opportunity to cross examine the witnesses for each Petitioner and to brief the issue.²⁴

²³ *Motion to Compel* at 12, (citing *Coalition Petition for Suspension and Modification*, TRA Docket No. 06-00228, pg. 9).

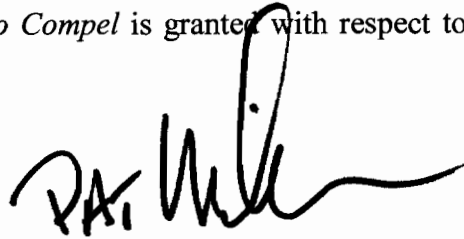
²⁴ *Response* at 14-15.

The Hearing Officer finds that information concerning the availability of certain data necessary to performing a TELRIC study is or may be a consideration in the determination of undue economic burden in this case. Thus, it is within the scope of discovery and the Rural Coalition shall provide answers responsive to Interrogatory Number 7.

For the foregoing reasons, the Hearing Officer finds that, as set forth below, the *Motion to Compel* is granted in part, granted subject to limitation, and denied in part.

IT IS THEREFORE ORDERED THAT:

1. The *CMRS Providers' Motion to Compel* is denied with respect to Interrogatory Number 1.
2. The *CMRS Providers' Motion to Compel* is granted with respect to Request for Production of Documents Numbers 1 and 2.
3. The *CMRS Providers' Motion to Compel* is granted with respect to Interrogatory Numbers 2 and 7.
4. The *CMRS Providers' Motion to Compel* is granted with respect to Interrogatory Number 5(a), with the limitation that CenturyTel shall identify each cost study, as indicated in the interrogatory, to support any Transport and Termination rates it has sought to charge any interconnecting Telecommunications Carrier *in Tennessee*.
5. The *CMRS Providers' Motion to Compel* is granted with respect to Request for Production of Documents Number 7.

A handwritten signature in black ink, appearing to read 'Pat Miller', with a stylized, flowing script.

Director Pat Miller as Hearing Officer

- v. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.
6. For each Rural Coalition member other than TDS and CenturyTel:
 - a. Identify each cost study (by jurisdiction and date) that has been performed for the Coalition member or an Affiliate to support any Transport and Termination rate(s) that either the Coalition Member or an Affiliate has sought to charge any interconnecting Telecommunications Carrier.
 - b. For each cost study, identify:
 - i. The name of the entity that performed the study.
 - ii. The cost of performing the study.
 - iii. Whether the study was filed in a state cost proceeding conducted under Section 252(d) of the Act;
 - iv. If answer to "iii" is yes, identify such state(s) and indicate whether such study was approved by such state commission(s) as producing TELRIC rates.
 - v. If answer to "iii" is yes, and such study was approved by such state commission(s) as producing TELRIC rates, identify with particularity such state commission order(s) approving such study.
7. For each Coalition member, please, complete the following chart, which is not asking for production of company-specific data. This interrogatory merely asks that, as to each category of information described in Column (A), each Coalition member answer "Yes" or "No" to the questions respectively posed in Columns (B), (C) and (D). If Column (B) is answered "yes," then Columns (C) and (D) need not be answered. If Column (C) is answered "yes," then Column (D) need not be answered. Column (D) need be answered only if Columns (A) and (B) are both answered "no."

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
1. Identification of host, remote and tandem switches by common name and CLLI Code.			
2. For each identified tandem, whether wireless-originated traffic is switched by			

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
and transits that tandem.			
3. The year each switch was originally placed in service.			
4. Lines in service for each switch.			
5. Lines in service for each exchange.			
6. Host-remote trunks in service (DSOs) for each switch.			
7. Total interoffice trunks in service (DSOs) for each switch (i.e., trunks to other standalone/host switches or tandem switches).			
8. Total annual switched access minutes of use.			
9. Location of meet points with other landline carriers.			
10. Length of each interoffice cable route.			
11. Type of each interoffice cable (copper or fiber, buried, underground or aerial).			
12. Size of each interoffice cable (e.g. 24 fiber cable).			
13. Number of interoffice fibers assigned used for digital loop carrier systems.			
14. Number of interoffice fiber leased to third-parties.			
15. Number of interoffice fibers used by interoffice transport system.			
16. The size of transport transmission			

(A)	(B) Is This Information Currently Available Within Your Records?	(C) If the Answer in Column (B) is No, Can This Information be Collected by Current Employee(s)?	(D) If the Answer in Columns (B) and (C) is No, Can This Information be Collected by an Outside Consultant?
equipment located at each switch.			
17. Copy of continuing property record (CPR) for Central Office Switching (e.g., account 2212) for year end 2005.			
18. Composite interstate and intrastate access charges			
19. Total DS1 and DS3 circuits between each end office switch and its corresponding access tandem.			
20. Total DS1 and DS3 circuits between each host central office switch and its subtending remote switch(es).			

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. For each Rural Coalition member, produce copies of the three (3) most recent audited financial statements containing Part 32 – Uniform System of Accounts level detail.
2. Produce copies of all documents supporting the answers to Interrogatory Number 2.
3. Produce copies of all documents supporting the answers to Interrogatory 3(b).
4. Produce all documents supporting the cost estimates in Petitioners' Supplemental Statement filed herein.
5. Produce a copy of each cost study identified in response to Interrogatory 4(a).
6. Produce a copy of any orders supporting the answer to Interrogatory 4(b)(v).
7. Produce a copy of each cost study identified in response to Interrogatory 5(a).