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VIA HAND DELIVERY

Sharla Dillon, Docket Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: Tennessee Rural Independent Coalition
Petition for Suspension and Modification
TRA Docket No. 06-00228

Dear Ms. Dillon:

Enclosed for filing in the above-referenced matter are: 1) the original plus four copies and a pdf-formatted disc containing an electronic version of the original Joint Supplemental Response of the Tennessee Rural Independent Coalition to CMRS Providers' Interrogatories and Requests for Production of Documents to Rural Coalition Members; and 2) the original and thirteen copies of the Notice of Filing of the Supplemental Responses of the TEC Companies Crockett Telephone Company, Inc., People's Telephone Company, Inc. and West Tennessee Telephone Company, Inc. to the TRA's request for Reciprocal Compensation and Billing Information.

As always, thank you for your assistance in this matter.

Sincerely,



William T. Ramsey

WTR:mmm
Enclosures

cc: All Counsel of Record

RECEIVED
Tennessee
TRANSPORTATION

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

In the Matter of:

**Tennessee Rural Independent
Coalition Petition for Suspension
And Modification Pursuant to
47 U.S.C. Section 251(f)(2)**

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Docket No. 06-00228

**JOINT SUPPLEMENTAL RESPONSE OF THE
TENNESSEE RURAL INDEPENDENT COALITION TO
CMRS PROVIDERS' INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO RURAL COALITION MEMBERS**

Petitioners, the Tennessee Rural Independent Coalition, submit the following supplemental responses to each of the "CMRS Providers' Interrogatories and Requests For Production Of Documents To Rural Coalition Members." This supplemental response is submitted in response to the Order issued by Director Miller as Hearing Officer on April 23, 2007, the Addendum to the Order issued on April 25, 2007, and the Hearing Officer's ruling dated May 4, 2007, extending, by agreement, the deadline to respond. These orders, issued in response to the Motion to Compel submitted by the CMRS Providers, required the Coalition members to provide additional responses to certain interrogatories and requests for documents set forth by the CMRS Providers.

By responding, the Coalition does not waive its argument that the CMRS Providers seek information that is both burdensome to produce and irrelevant to this proceeding. The Coalition has respectfully asked the Authority to recognize and alleviate the administrative burden imposed by its Order and Addendum. It should not be overlooked that the burden imposed on the Coalition members results from the good faith attempt of

the Coalition members to avail themselves of their rights under the Communications Act of 1934, as amended, to avoid undue burdens that may result from interconnection requests.

Fair and equitable consideration of the suspension request submitted by each Coalition member pursuant to their rights under Section 251(f)(2) of the Communications Act is vital not only to each Coalition member, but to the rural Tennessee consumers they serve. The Coalition invested considerable effort to explain to the Authority why certain of the CMRS Providers' discovery requests are irrelevant and burdensome. Requiring each Coalition member nonetheless respond to the requests has added immeasurably to the very burdens from which the Coalition members have sought relief in accordance with the Communications Act.

Notwithstanding these concerns, the Coalition members have each attempted to respond in good faith to the requirements of the Addendum to the Order. The Coalition respectfully responds below to each of the Interrogatories and Requests for Production of Documents in accordance with the April 23, 2007, Authority Order. Where applicable and practicable, individual company responses are attached as proprietary exhibits to this response, together with an affidavit on behalf of each Coalition member.

Finally, Coalition members, the TEC Companies Crockett Telephone Company, Inc., Peoples Telephone Company, Inc., and West Tennessee Telephone Company, Inc. have included in this filing supplemental responses to the TRA's request for Reciprocal Compensation and Billing Information.

INTERROGATORIES

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.

SUPPLEMENTAL RESPONSE: As indicated in the Coalitions’ April 27, 2007, Petition for Reconsideration, 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.

Moreover, some Coalition members do not ordinarily produce or retain the information requested in items (a), (e), and (f) with respect only to the operations of each company. Items (a) and (e) relate to tax issues. Some Coalition members file taxes on a consolidated basis including the operations of affiliates, and some Coalition members (co-ops) are tax exempt. As the Authority noted in the April 23 Order on the Motion to Compel, information related to affiliates of each Coalition member is not relevant to this proceeding. Each Coalition member has, however, produced the financial information that is available to each.

To the extent practicable, individual responses of Coalition members are attached hereto. The Coalition members respectfully request that the Authority and the CMRS Providers maintain the confidentiality of these proprietary exhibits in accordance with the Protective Order entered in Docket No. 03-00585 as previously agreed. The Coalition members produce this information on the additional condition that it not be used for any purpose outside of these proceedings and that all copies of the information be destroyed at the conclusion of these proceedings .

5. For CenturyTel:

- a. Identify each cost study (by jurisdiction and date) that has been performed by or for CenturyTel to support any Transport and Termination rate(s) it has sought to charge any interconnecting Telecommunications Carrier in any jurisdiction.

SUPPLEMENTAL RESPONSE: CenturyTel does not have any cost studies used to support Transport and Termination rates charged to any interconnecting Telecommunications Carrier in Tennessee.

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 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 (DS0s) for each switch.			
7. Total interoffice trunks in service (DS0s) 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.			

(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?
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 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).			

SUPPLEMENTAL RESPONSE: As indicated in the Coalitions' April 27, 2007, Petition for Reconsideration, 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.

To the extent practicable, individual responses of Coalition members are attached hereto. The Coalition members respectfully request that the Authority and the CMRS Providers maintain the confidentiality of these proprietary exhibits in accordance with the Protective Order entered in Docket No. 03-00585 as previously agreed. The Coalition members produce this information on the additional condition that it not be used for any purpose outside of these proceedings and that all copies of the information be destroyed at the conclusion of these proceedings .

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.

RESPONSE: As indicated in the Coalitions' April 27, 2007, Petition for Reconsideration, 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.

To the extent practicable, individual responses of Coalition members containing available information are attached hereto. The Coalition members respectfully request that the Authority and the CMRS Providers maintain the confidentiality of these proprietary exhibits in accordance with the Protective Order entered in Docket No. 03-00585 as previously agreed. The Coalition members produce this information on the additional condition that it not be used for any purpose outside of these proceedings and that all copies of the information be destroyed at the conclusion of these proceedings .

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

RESPONSE: As indicated in the Coalitions' April 27, 2007, Petition for Reconsideration, 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.

To the extent practicable, individual responses of Coalition members containing available information are attached hereto. The Coalition members respectfully request that the Authority and the CMRS Providers maintain the confidentiality of these proprietary exhibits in accordance with the Protective Order entered in Docket No. 03-00585 as previously agreed. The Coalition members produce this

information on the additional condition that it not be used for any purpose outside of these proceedings and that all copies of the information be destroyed at the conclusion of these proceedings .

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

RESPONSE: See Supplemental Response to Interrogatory 5(a).

On Behalf of
The Tennessee Rural Independent Coalition and
Each Individual Petitioner

By William T. Ramsey

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Stephen G. Kraskin
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DATED: May 4, 2007

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 4th day of May, 2007, 2007, a true and correct copy of the foregoing was served on the parties of record via the method indicated:

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronically

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