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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of WWC	)	
Holding Co., Inc. for Arbitration of an	)	Docket No. 03-2403-02
Interconnection Agreement	)	

RESPONSE TO WESTERN WIRELESS' DISCOVERY REQUESTS 1-25

Gunnison Telephone Company ("Gunnison"), by and through its attorneys of record, hereby respond to WWC Holding Co., Inc.'s ("Western Wireless"), Discovery Requests 1-25 as follows:

GENERAL OBJECTIONS

Gunnison objects to the discovery requests to the extent that they request documents or information protected by the attorney work product or the attorney-client privilege. Gunnison also objects to the instructions and definitions insomuch as they impose a burden to respond on Gunnison which is beyond that required by the Utah Rules of Civil Procedure. Furthermore, Gunnison will make the documents in its possession or under its control available for inspection and photocopying at the offices of Gunnison's counsel at a mutually convenient date and time or will provide such documents as may be available electronically upon entry of a protective order governing confidentiality in this docket. Pursuant to Rule 34 of the Utah Rules of Civil Procedure, Gunnison will produce documents as they are kept in the usual course of business.

DISCOVERY RESPONSES

1. For each switch within each Utah ILEC's network, provide the following information in the electronic spreadsheet

format provided in Exhibit 1:

a) End Office Name

b) CLLI Code

c) V&H Coordinates

d) NPA-NXX(s)

e) Switch Manufacturer and Model

f) Switch Function/Type (tandem, end office, host, remote)

g) Switches that subtend

h) Installed Switch Capacity (trunks and lines in DS0 equivalents)

i) In Use Switch Capacity (trunks and lines in DS0 equivalents)

j) Access Tandem

k) Qwest meet point (V & H Coordinate)

l) Route miles from switch to meet point

Response: Gunnison objects to this Request on the grounds that some of the information sought is irrelevant to this proceeding. Nevertheless, without waiving this objection, Gunnison will provide available information in its possession by electronic means upon entry of a protective order governing confidentiality. The above requested information is provided in Exhibit 1, except installed switch capacity and in-use switch capacity are not provided. Installed switch capacity is based upon the number of access lines in service plus foreseeable growth. Switch utilization is defined in the response to Discovery Request 3.

2. For each switch within each Utah ILEC's network, provide 2002 minute of use data, stating whether the reported data are measured or estimated, and identifying the records that support the responses. Provide your response in the electronic spreadsheet format provided in Exhibit 2. Include the following information:

a) End Office Name

b) CLLI Code

c) Intra-exchange landline voice usage

d) Inter-exchange local and EAS usage

e) Terminating CMRS usage

f) Originating CMRS usage

g) Dial-up ISP usage

h) Intrastate Toll usage

i) Interstate Toll usage

j) Total usage

Response: Gunnison objects to this request on the grounds that it is vague, ambiguous, overbroad and burdensome. Nevertheless, without waiving this objection, Gunnison will provide such available information responsive to the above request kept in the ordinary course of business and in its possession, by electronic means upon entry of a protective order. The above requested information is provided in Exhibit 1, except as described following. Gunnison recovers its interstate costs on an average schedule basis as determined by the average schedule formulas of the National Exchange Carrier Association ("NECA") and is therefore not required to perform an annual traffic study for separations purposes. In addition, the Utah Public Service Commission does not require an annual traffic study of Gunnison. Therefore, Gunnison does not have any of the requested data. The utilization of traffic data in the development of forward-looking costs is discussed in the documents provided in response to Request 11.

3. For each switch or meet point, provide the following interoffice circuit information for each Utah ILEC's network. Provide your response in DS1 equivalents. Provide your response in the electronic format provided in Exhibit 3.

a) End Office Name ('A' Location)

b) CLLI Code

c) 'Z' Location

d) For each 'A' and 'Z' Location Combination

e) Host-Remote circuits

f) Feature Group C circuits

g) Feature Group B&D circuits

h) OS/DA/911 circuits

i) Local or EAS circuits

j) Special Access & Other circuits

Response: Gunnison objects to this Request on the grounds that it is overbroad and burdensome and that some of the information sought is irrelevant to this proceeding. Nevertheless, without waiving this objection, Gunnison will provide such available information as it possesses Gunnison by electronic means upon entry of a protective order. The response is provided in Exhibit 3 by circuits in use.

4. For each rate center or switch within each Utah ILEC's network, provide the local and EAS calling information. Provide your response in the electronic format provided in Exhibit 4.

a) Rate Center

b) Switch Name

c) CLLI Code

d) IntraCompany Local Calling

e) InterCompany Local Calling

Response: Gunnison objects to this request on the grounds that it is overbroad and burdensome. Nevertheless, without waiving this objection, Gunnison will provide such available information as it maintains in the regular course of business in electronic format upon entry of a protective order. Gunnison recovers its interstate costs on an average schedule basis as determined by the average schedule formulas of the National Exchange Carrier Association ("NECA") and is therefore not required to perform an annual traffic study for separations purposes. In addition, the Utah Public Service Commission does not require an annual traffic study of Gunnison. Therefore, Gunnison does not have any of the requested data. The utilization of traffic data in the development of forward-looking costs is discussed in the documents provided in response to Request 11.

5. What is the actual weighted cost of each Utah ILEC's outstanding long-term debt as of year-end 2002, including all federal funding such as RUS?

Response: Gunnison objects to this question, as historical cost of debt is not relevant to this proceeding. The utilization of a total cost of debt in the development of a total return on investment is discussed in the documents provided in response to Request 11.

6. Provide the names of all carriers with which each Utah ILEC currently exchanges any traffic on a bill and keep basis and describe the terms of the arrangement, the traffic subject to such an agreement, and how such traffic is routed and rated.

Response: No such arrangements or agreements exist.

7. Identify the applicable interstate and intrastate switched access rates for each Utah ILEC, and identify the portion of the network related to each rate element that makes up those rates. Identify each rate element that would apply to the delivery of CMRS traffic originating in a different MTA and delivered via Qwest transit facilities.

Response: Gunnison objects to this request on the grounds that it is overbroad and burdensome. Nevertheless, without waiving this objection, it provides this information:

Following are the access rates in accordance with Gunnison's intrastate and interstate tariffs.

		Intrastate*		Interstate**		NECA**
Rate Element		Orig.	Term.	Orig.	Term.	Rate Band
Carrier Common Line		$0.000000	$0.000000	$0.000000	$0.000000	N/A
Switching		$0.017500	$0.017500	$0.014208	$0.014208	5
Transport	Fixed	$0.017500	$0.017500	$0.000833	$0.000833	N/A
	Per Mile	$0.000000	$0.000000	$0.000169	$0.000169	
Information Surcharge (x100)		$0.000000	$0.000000	$0.009300	$0.009300	N/A

* Gunnison Telephone Company is a concurring carrier in the Exchange Carriers of Utah Access Service Tariff, P.S.C.U. No. 1.
** Gunnison Telephone Company is a member of the National Exchange Carrier Association and concurs in the NECA Interstate Access Tariff #5.

All switched access rate elements would apply to CMRS traffic delivered directly or via transit facilities.

8. For each switch purchased by each Utah ILEC on or after January 1, 2000, identify the switch purchase date, the gross switch purchase price, and any switch discount.

Response: Gunnison objects to this question because it is not relevant to this proceeding. Gunnison has provided financial data in response to other discovery requests.

9. Provide copies of all interconnection agreements and traffic exchange agreements between each Utah ILEC and any ILEC, CLEC, or CMRS provider.

Response: No such agreements exist. In the absence of an interconnection agreement, switched access rates would apply.

10. Provide copies of audited financial statements for each Utah ILEC for 2000, 2001, and 2002.

Response: Gunnison objects to this question on the grounds that the request is burdensome and oppressive. The audited financial statements include proprietary information that is not released to competitors or the general public. Moreover, the financial statements are not relevant to this transport and termination proceeding. Gunnison has provided financial information regarding 2002 in response to other discovery requests. It objects to the release of any data for 2000 and 2001 on the grounds of relevance and asserts that such request is designed to be burdensome and oppressive in that such historical data is not relevant to a forward looking cost model.

11. Provide a copy of any cost study used by each Utah ILEC to support its proposed rates in the Interconnection Agreement.

Response: A copy of the output file from the HAI Model 5.0a (Exhibit 11) utilized in the development of the proposed rates will be provided in electronic format upon entry of a protective order. Included with this model is a description of the user adjustable inputs that have been modified to reflect company and timing specific circumstances, labeled as Exhibit 11.1. Should Western Wireless desire to further review the model utilized, Gunnison invites Western Wireless and its representatives to review the model at the offices of GVNW Consulting, Inc. at 2270 La Montana Way, Colorado Springs, Colorado, 80918.

12. Identify how the proposed rates in the cost study meet the forward-looking costs obligations of Section 252(d)(2)(A) of the Act which provides that: "... <u>a State commission shall not consider the terms and conditions for reciprocal compensation to be just a reasonable unless</u> (i) such terms and conditions provide for the <u>mutual</u> and <u>reciprocal</u> recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities of the other carrier, and (ii) such terms and conditions determine such costs on the basis of a <u>reasonable approximation of the additional costs of terminating such calls</u>." (emphasis added).

<u>Response</u>: The costs provided by Gunnison follows current FCC implementation rules and policies. In its *Local Competition Order*, the FCC recognized the differences in the statutory provisions that govern the pricing of transport and termination, and unbundled network elements, and stated the following:

> We conclude that the pricing standards established by section 252(d)(1) for interconnection and unbundled elements, and by section 252(d)(2) for transport and termination of traffic, are sufficiently similar to permit the use of the same general methodologies for establishing rates under both statutory provisions… We, therefore, find that the "additional cost" standard permits the use of the forward-looking, economic cost-based pricing standard that we are establishing for interconnection <u>and</u> unbundled elements. (Local Competition Order, paragraph 1054, Emphasis Added)

The FCC also clarified which components of the LEC's network constitute "additional costs", when it stated the following:

> We find that, once a call has been delivered to the incumbent LEC end office serving the called party, the "additional cost" to the LEC of terminating a call that originates on a competing carrier's network primarily consists of the traffic-sensitive component of local switching… For the purposes of setting rates under section 252(d)(2), only that portion of the forward-looking economic cost of end-office switching that is recovered on a usage-sensitive basis constitutes an "additional cost" to be recovered through termination charges. (Local Competition Order, paragraph 1057)

The HAI Model 5.0a ("HAI") is a forward-looking, economic-cost based model that has been reviewed by the FCC and was utilized as a basis for the FCC's own forward-looking cost model. The HAI was developed and supported by AT&T and MCI, and continues to be utilized in federal and state proceedings throughout the country. The forward-looking rates developed in the HAI Model 5.0a and proposed here are intended to be for the mutual and reciprocal use of each carrier.

13. Provide a copy of any cost study, prepared by each of the Utah ILEC's in the past five years, and each Utah ILEC's most recent interstate and intrastate access rate cost study.

Response: Gunnison objects to this question, as it is not relevant to the development of forward-looking costs as required by the FCC. Any data necessary to determine the actual costs of the company can be determined through the financial information provided in response to other discovery requests and the most recent traffic study, as discussed previously. Furthermore, without waiving this objection, Gunnison recovers its interstate costs on an average schedule basis as determined by the average schedule formulas of the National Exchange Carrier Association ("NECA") and is therefore not required to perform an annual cost. In addition, the Utah Public Service Commission does not require an annual cost study of Gunnison.

14. Provide copies of all documentation, including work papers, notes, purchase contracts, planning documents, and the like, used or referred to in determining all inputs to any cost model or study offered in response to request 10.

Response: There are no documents prepared in connection with the response to Request No. 10. If Western Wireless means Request No. 11, Gunnison objects to the request on the grounds of work product privilege. Nevertheless, without waiving this objection, Gunnison will produce documentation necessary to support its cost study. This documentation is included with the output file from the HAI Model 5.0a referred to in the response to Discovery Request 11.

15. Provide any switch purchase contracts entered into by each Utah ILEC since January 1, 2000, including line item detail for switch components.

Response: Gunnison objects to this request on the grounds that it is not relevant to this proceeding. Nevertheless, without waiving this objection, Gunnison has produced in response to other discovery requests, financial information including switching investment.

16. Provide any contracts or purchase order reflecting each Utah ILEC's purchase of transmission equipment since January 1, 2000, including line detail for equipment components.

Response: Gunnison objects to this request on the grounds that it is extremely burdensome, would require significant expenditures of time and effort to retrieve such information, and furthermore on the grounds that such information is not relevant to this proceeding. Gunnison will provide financial and other data from which the costs of transport and termination can be determined.

17. Provide a copy of the 2000, 2001 and 2002 financial statements and/or annual report for each Utah ILEC's affiliated entities.

Response: Gunnison objects to this question, as the financial statements of affiliated entities are not relevant to this proceeding and include proprietary and confidential information that is not released to competitors or the general public. See also Response to Request No. 10, which objection is incorporated herein by reference.

18. Provide a copy of each Utah ILEC's 2000, 2001 and 2002 RUS Annual Report.

Response: Gunnison objects to the production of historical data for 2000 and 2001. See Objection to Request No. 10 incorporated herein by reference. Nevertheless, Gunnison has no RUS Reports.

19. Provide a complete copy of each Utah ILEC's investments for 2000, 2001 and 2002, by USOA code, at the most discrete level of detail available consistent with 47 CFR Part 32 definitions. For example, Account 2230 should be separated into Accounts 2231 (Radio Systems), and 2232 (Circuit Equipment). Further, Account 2232 should be broken down into sub-accounts 2232.1 (electronic) and 2232.2 (optical) in accordance with 47 CFR Part 32.32.2232).

Response: Gunnison objects to the provision of data for 2000 and 2001 on the grounds of relevance. See Objection to Request No. 10 incorporated herein by reference. Gunnison will produce a trial balance for 2002 by electronic means in the account detail utilized by the forward looking cost model, upon entry of a protective order.

20. Provide a complete copy of each Utah ILEC's investments for 2000, 2001 and 2002, by field reporting code ("FRC") at the most discrete level of detail available, including sub-codes.

Response: Gunnison objects to this question as to 2000 and 2001 on the grounds of relevance as set forth in Objection to Request No. 10, incorporated herein by reference. Gunnison further objects to this request as burdensome and oppressive, as the company does not maintain plant records by field reporting code. Nevertheless, without waiving this objection Gunnison will provide investment detail for 2002 in its electronic submissions upon entry of a protective order as part of its response to Request No. 19.

21. Provide a complete copy of each Utah ILEC's expenses for 2000, 2001 and 2002, by USOA code, at the most discrete level of detail available consistent with 47 CFR Part 32 definitions. For example, Account 2230 should be separated into Accounts 2231 (Radio Systems), and 2232 (Circuit Equipment). Further, Account 2232 should be broken down into sub-accounts 2232.1 (electronic) and 2232.2 (optical) in accordance with 47 CFR Part 32.32.2232).

Response: Gunnison objects to the provision of data for 2000 and 2001 on the grounds of relevance. See Objection to Request No. 10 incorporated herein by reference. Gunnison will produce a trial balance of expenses for 2002 by electronic means in the account detail utilized by the forward looking cost model, upon entry of a protective order.

22. Provide a complete copy of each Utah ILEC's expenses for 2000, 2001 and 2002, by field reporting code ("FRC") at the most discrete level of detail available, including sub-codes.

Response: Gunnison objects to this question as to 2000 and 2001 on the grounds of relevance as set forth in Objection to Request No. 10, incorporated herein by reference. Gunnison further objects to this request as burdensome and oppressive, as the company does not maintain accounting records by field reporting code.

23. Provide a complete copy of each Utah ILEC's revenues for 2000, 2001 and 2002, by USOA code, at the most discrete level of detail available consistent with 47 CFR Part 32 definitions.

Response: Gunnison objects to this question as it not relevant to this transport and termination proceeding, is overbroad, oppressive and is designed to harass and includes proprietary and confidential information that is not released to competitors or the general public.

24. Provide a map of each Utah ILEC's network configuration including a map depicting interoffice facility links and distances to connect the central offices.

Response: Gunnison is a single wire center company and therefore does not have intracompany, interoffice links. No map is available.

25. Please identify the quantity and type of each circuit that delivers CMRS terminating traffic from each Qwest tandem to each Utah ILEC's end office. Please state whether these circuits are or are not included in the circuit counts provided in response to request 4.

Response Gunnison objects to this Request on the grounds of relevancy. Nevertheless, without waiving this objection, traffic that is routed to Gunnison from the Qwest tandem is provided over common trunks. Because Qwest does not separately identify CMRS traffic or route CMRS traffic over specific common trunks, Gunnison is unable to accurately determine the quantity of common trunks that deliver CMRS traffic. However, it is Gunnison's understanding that CMRS traffic can be routed over any of these common trunks. As to Western Wireless traffic, this information is more readily available to Western Wireless than to Gunnison.

DATED this _____ day of August, 2003.

Gunnison Telephone Company

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OBJECTIONS DATED August, 2003.

BLACKBURN & STOLL, L.C.

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Jerry D. Fenn
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