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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 26-37**

Gunnison Telephone Company ("Gunnison"), by and through its attorneys of record, hereby respond to WWC Holding Co., Inc.'s ("Western Wireless"), Discovery Requests 26-37 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. 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**

26. For each Utah ILEC provide all information associated with new fiber placements over the last five years.

Response: Gunnison objects to this Request on the grounds that it is vague, ambiguous, overbroad and

burdensome and that the information sought is irrelevant to this proceeding.

27. Identify each interoffice facility project for each Utah ILEC undertaken in the past five years and for each project identify if it was performed jointly with another company or an affiliate.

**Response:** Gunnison objects to this Request on the grounds that it is vague, ambiguous, overbroad and burdensome and that the information sought is irrelevant to this proceeding.

28. Confirm or deny that no traffic transits between remote switches and host switches other than EAS traffic and toll traffic. If this statement is denied, identify all other types of traffic that transits between a host switch and a remote switch (such as CMRS, ISP, or other non-EAS local traffic).

**Response:** It is incorrect that only EAS and toll traffic transit between host and remote switches. In addition to EAS and toll traffic, there are several other types of traffic that transit between host and remote switches, including: local, CMRS, ISP, E-911 and potentially other types of traffic.

29. Is any local or EAS intercompany traffic carried on H-R links between a Utah ILEC end office and a host or remote of another carrier? If so, please specify the routes on which this occurs. If not, please confirm that all intercompany local and EAS traffic is exchanged on circuits reported as 'EAS or Local Circuits' in request 3.

**Response:** There is no host-remote link between Gunnison and a host or remote of another carrier.

30. For each remote switch, identify the amount of CMRS traffic that transits between the host switch and the remote switch.

**Response:** As identified in response to Discovery Request 2, Gunnison recovers its interstate costs on an average schedule basis as determined by the average schedule formulas of the National Exchange Carrier Association and is therefore not required to perform annual traffic studies for separations purposes. In addition, the Utah Public Service Commission does not require an annual traffic study for this company.

31. For each remote switch, identify the amount of other local traffic (i.e., non-CMRS and non-EAS) that transits between the remote switch and the host switch.

\_\_\_\_\_ **Response:** See response to Discovery Request No. 30.

32. Provide a detailed explanation of how DSL is deployed within each Utah ILEC's network

**Response:** Gunnison objects to this discovery request on the grounds that the information requested is not relevant to this transport and termination proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the information sought is proprietary and confidential and not disclosed to competitors.

33. Admit that calls originated by customers of each Utah ILEC have been terminated by CMRS carriers within the same MTA.

\_\_\_\_\_ **Response:** Where there is a local interconnection agreement in place, or where there are dedicated transport facilities between the company and CMRS carrier(s), local intraMTA traffic has been and is terminated by CMRS carriers. However, non-local intraMTA traffic has been and continues to be routed to the originating customer's presubscribed interexchange carrier for delivery of the toll call.

34. For the years 1998-2002, identify by year all minutes of land-to-mobile traffic originated by each Utah ILEC local subscriber and terminated to a CMRS customer within the same MTA. \_\_\_\_\_ **Response:** Gunnison objects to this question on the grounds that the request is burdensome, oppressive and cost prohibitive. It objects to the release of historical data 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. Nevertheless, without waiving this objection, Gunnison is only able to identify the local intraMTA traffic that terminates to a CMRS customer whose provider has dedicated transport facilities. All non-local intraMTA traffic is routed to the appropriate interexchange carrier and is recorded as a toll call to that interexchange carrier. Gunnison is unable to separately identify CMRS traffic that is routed through the tandem over common trunks. However, without waiving its objection, Gunnison requires additional time to produce traffic information but will only provide the information which is reasonably available and which it can economically capture for the period that such information is available.

35. Identify the percentage of total lines that selected each Utah ILEC long distance as the presubscribed interexchange carrier.

**Response:** Gunnison objects to this discovery request on the grounds that the information requested is not relevant to this transport and termination proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the information sought is proprietary and confidential and not disclosed to competitors.

36. Identify all revenue received, including universal service support, related to each Utah ILEC's network facilities used to transport and terminate telecommunications traffic. Specifically identify the source of the revenue and the amount of revenue received on a per line basis..

**Response:** Gunnison objects to this question, as the this information not relevant to this proceeding and include proprietary and confidential information that is not released to competitors or the general public.

37. Have any Utah ILEC attempted to negotiate interconnection agreements with other telecommunications carriers without success? If so, has any Utah ILEC sought state commission mediation or arbitration of open issues?

**Response:** Gunnison objects to this discovery request on the grounds of relevance. Nevertheless, without waiving this objection, it has not previously sought arbitration by the Utah Public Service Commission of an interconnection agreement.

DATED this \_\_\_\_ day of September, 2003.

BLACKBURN & STOLL, L.C.

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