

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

In the Matter of Petition of Alma Telephone)	
Company for Arbitration of Unresolved Issues)	
Pertaining to a Section 251(b)(5) Agreement)	Case No. IO-2005-0468, <i>et al.</i>
With T-Mobile USA, Inc.)	Consolidated

T-MOBILE'S OBJECTIONS TO DATA REQUESTS

Comes now T-Mobile USA, Inc. ("T-Mobile"), the Respondent in this consolidated arbitration proceeding, and pursuant to 4 CSR 240-2.090(2), responds to the Data Requests propounded by the Petitioners herein.

1. T-Mobile's review of the Data Requests indicates that the same fourteen Requests are propounded for each of the four Petitioners. As such, T-Mobile's objections to the Requests are directed to each of the Petitioners. T-Mobile also uses the same paragraph numbering as in the Petitioners' Data Requests.

2. As a blanket objection (which is also repeated in response to the individual Requests in the form of a relevance objection) T-Mobile states that each of the Requests seeks information relating to traffic volumes prior to the Petitioners' request for negotiation of the Traffic Termination Agreements, and that issues relating to traffic volumes, compensation, and jurisdictional allocations prior to the request for arbitration are relevant to and should be resolved in the pending Complaint Proceeding between and among the parties, Case No. TC-2002-57, and are not relevant to the forward-looking Traffic Termination Agreements which are to be the end product of this arbitration. T-Mobile will file a motion to exclude those issues from this arbitration proceeding.

RESPONSES

1. Please state the total amount of wireless to landline traffic terminating to [Petitioner] between February 5, 1998 and March 12, 2005 for which T-Mobile has not paid compensation to Alma.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are

aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

2. Of the amount listed in your response to # 1 above, please state how much of such traffic was interMTA in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

3. Of the amount listed in your response to # 1 above, please state how much of such traffic was intraMTA in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

4. Please describe how you determined the proportions of interMTA and intraMTA traffic set forth in your answers to DR's # 2 and # 3 above.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are

aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

5. Of the interMTA traffic amounts set forth in your response to DR # 2 above, please state how much of such traffic was interstate in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

6. Of the interMTA traffic amounts set forth in your response to DR # 2 above, please state how much of such traffic was intrastate in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

7. Please describe how you determined the proportions of interstate and intrastate traffic set forth in your answers to DR's # 5 and # 6 above.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are

aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

8. Please provide hard copies and electronic duplicates of any and all information in the possession of T-Mobile upon which your answers to DR's # 1-8 above were based.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

9. Please state the total amount of landline to wireless traffic originated by customers of [Petitioner], and identify by dates the periods during which such traffic was terminated.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

10. Please state how much, if any, of the traffic identified in #9 above for which T-Mobile has received terminating compensation.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are

aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

11. Of the amount listed in your response to # 9 above, please state how much of such traffic was interMTA in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

12. Of the amount listed in your response to # 9 above, please state how much of such traffic was intraMTA in jurisdiction.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

13. Please describe how you determined the proportions of interMTA and intraMTA traffic set forth in your answers to DR's # 11 and # 12 above.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are

aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

14. Please provide hard copies and electronic duplicates of any and all information in the possession of T-Mobile upon which your answers to DR's # 9-13 above were based.

Response: T-Mobile objects to this Request, as it seeks the discovery of information related to Petitioners' claims for compensation for the past exchange of traffic, which is irrelevant to the issues to be resolved in this arbitration, and whose discovery is not reasonably calculated to lead to the discovery of relevant information. In addition, as the Petitioners are aware from the proceedings in Case No. TC-2002-57, T-Mobile has not tracked or retained the detailed call information sought in this Request.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and final copy of the foregoing was served via electronic transmission on this 7th day of July, 2005, to the following counsel of record:

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