



**Lisa Creighton Hendricks**  
Senior Attorney

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November 14, 2003

Michael F. Dandino  
Office of Public Counsel  
200 Madison Street, Suite 650  
Jefferson City, MO 65101

Re: Tariff Nos. JI-2004-0611; JI-2004-0612; JI-2004-0613; JI-2004-0614; and  
JI-2004-0615

Dear Mr. Dandino:

Enclosed please find Sprint's objections to Data Requests 1, 4, 5, 6, 7 and 8 in the  
above-referenced matter.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,



Lisa Creighton Hendricks

LCH/sly  
enclosures

**Data Request No.:** 1  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

**Information Requested:**

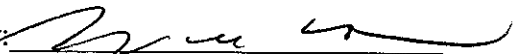
For each rate modification proposed in the tariff filing (issued October 31, 2003 — effective December 18, 2003) and identified in the attached Exhibit 1 to these data requests as the October 31, 2003 filing letter and attachment, please provide the following information (If the information is available in an electronic format, please provide a CD or disk with the requested data):

- a. Name of the service as it appears on tariff sheet;
- b. Name of service as it appears on customer bills;
- c. Identify whether the service is basic local service, switched access service or a non- basic service
- d. State the monthly charge as of October 31, 2003;
- e. State the monthly charge as proposed in the rate modification;
- f. State the percentage increase or decrease between the present and proposed monthly charge (d and e above)
- g. State the non-recurring charge as of October 31, 2003; and
- h. State the nonrecurring charge as proposed in the rate modification;
- i. State the percentage increase or decrease between the present and the proposed nonrecurring charge (g and h above).

**Sprint Response:**

Sprint objects to this Data Request on the basis that all the information requested by the OPC is publicly available information and has been previously provided to OPC. As the information is equally available to OPC, it would be unduly burdensome for Sprint to perform the requested analysis that can be performed by OPC. Sprint is under no obligation to perform the above requested analysis if all the information is publicly available and previously provided.

Date Responded: 11-14-03

Signed By: 

Title: Senior Attorney

**Data Request No.:** 4  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

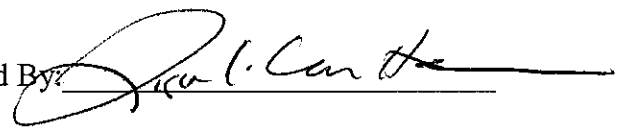
**Information Requested:**

Please identify any service and proposed rate modifications in the proposed tariff where the maximum allowable rates exceed the actual rates proposed to be billed to customers for that service.

**Sprint Response:**

Sprint objects on the basis that all the information requested by the OPC is publicly available information. The OPC is simply requesting Sprint to perform an analysis that OPC is perfectly capable of performing on its own and has all the available information. Furthermore, Sprint objects on the basis that all relevant information has been previously provided to the OPC. The OPC is capable of making the requested comparisons just as easily as Sprint and already has in its position (and on file in this case) the needed inputs. Sprint is in full compliance with all Commission rules pertaining to tariff filings and Sprint is under no obligation to perform an analysis on behalf of the OPC.

Notwithstanding these Objections, Sprint notes that the electronic files provided in response to DR #2 contains most, if not all, the requested information.

Date Responded: 11/14/03 Signed By:   
Title: Senior Attorney

**Data Request No.:** 5  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

**Information Requested:**


Please identify any service and proposed rate modifications in the proposed tariffs where the maximum allowable rates are less than the actual rates proposed to be billed customers for that service.

**Sprint Response:**

Sprint objects on the basis that all the information requested by the OPC is publicly available information. The OPC is simply requesting Sprint to perform an analysis that OPC is perfectly capable of performing on its own and has all the available information. Furthermore, Sprint objects on the basis that all relevant information has been previously provided to the OPC. The OPC is capable of making the requested comparisons just as easily as Sprint and already has in its position (and on file in this case) the needed inputs. Sprint is in full compliance with all Commission rules pertaining to tariff filings and Sprint is under no obligation to perform an analysis on behalf of the OPC.

Notwithstanding these Objections, Sprint notes that the electronic files provided in response to DR #2 contains most, if not all, the requested information

Date Responded: 11-14-03

Signed By: 

Title: Senior Attorney

**Data Request No.:** 6  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

**Information Requested:**

For proposed rate modifications for non-basic services, please identify all services where the proposed rate increase for that service exceeds 8% of the present rate.

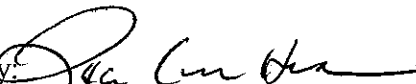
**Sprint Response:**

Sprint objects on the basis that all the information requested by the OPC is publicly available information. The OPC is simply requesting Sprint to perform an analysis that OPC is perfectly capable of performing on its own and has all the available information. Furthermore, Sprint objects on the basis that all relevant information has been previously provided to the OPC. The OPC is capable of making the requested comparisons just as easily as Sprint and already has in its position (and on file in this case) the needed inputs. Sprint is in full compliance with all Commission rules pertaining to tariff filings and Sprint is under no obligation to perform an analysis on behalf of the OPC.

Notwithstanding these Objections, Sprint notes that the electronic files provided in response to DR #2 contains most, if not all, the requested information.

Date Responded: 11-14-03

Signed By:



Title:

Senior Attorney

**Data Request No.:** 7  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

**Information Requested:**


For proposed rate modifications for basic local services, please identify all services where the proposed rate increase for that service exceed the CPI—TS as defined in section 392.2454(a).

**Sprint Response:**

Sprint objects on the basis that all the information requested by the OPC is publicly available information. The OPC is simply requesting Sprint to perform an analysis that OPC is perfectly capable of performing on its own and has all the available information. Furthermore, Sprint objects on the basis that all relevant information has been previously provided to the OPC. The OPC is capable of making the requested comparisons just as easily as Sprint and already has in its position (and on file in this case) the needed inputs. Sprint is in full compliance with all Commission rules pertaining to tariff filings and Sprint is under no obligation to perform an analysis on behalf of the OPC.

Notwithstanding these Objections, Sprint notes that the electronic files provided in response to DR #2 contains most, if not all, the requested information.

Date Responded: 11-14-03

Signed By: 

Title: Senior Attorney

**Data Request No.:** 8  
**Company Name:** Sprint Missouri, Inc. d/b/a Sprint-ILEC (Telephone)  
**Date Requested:** November 24, 2003  
**Requested From:** John Idoux  
**Requested By:** Michael F. Dandino  
Office of Public Counsel

**Information Requested:**

Please identify the rate modifications proposed pursuant to the statement in the filing letter of October 31, 2003 "updating its maximum allowable prices for non-basic services and adjusting certain rates as allowed by 2.245 11."

**Sprint Response:**

Sprint objects on the basis that all the information requested by the OPC is publicly available information. The OPC is simply requesting Sprint to perform an analysis that OPC is perfectly capable of performing on its own and has all the available information. Furthermore, Sprint objects on the basis that all relevant information has been previously provided to the OPC. The OPC is capable of making the requested comparisons just as easily as Sprint and already has in its position (and on file in this case) the needed inputs. Sprint is in full compliance with all Commission rules pertaining to tariff filings and Sprint is under no obligation to perform an analysis on behalf of the OPC.

Notwithstanding these Objections, Sprint notes that the electronic files provided in response to DR #2 contains most, if not all, the requested information.

Date Responded: 11-14-03

Signed By: 

Title: Senior Attorney