

John B. Coffman
Public Counsel



State of Missouri

FILE COPY

Bob Holden
Governor

Office of the Public Counsel
Governor Office Building
Ste. - 650
P.O. Box 2230
Jefferson City, Missouri 65102

Telephone: 573-751-4857
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1-800-735-2966 TDD
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May 13, 2004

Lisa Creighton Hendricks
Sprint
6450 Sprint Parkway
MS: KSOPHN0212-2A253
Overland Park, KS 66251

Re: Case No. TR-2002-251

Dear Lisa:

Public Counsel has recently retained William Dunkel and Associates to review the Sprint cost study re the rebalancing case TR-2002-251. While they have executed the necessary confidentiality agreements in this case and in TR-2001-65, the access costing case, and have access to all HC and proprietary information in both cases, they may need to reference some information in the access costing case provided by Sprint in this rebalancing case. Under the terms of the protective order, use of HC information obtained in one case cannot be used for other purposes and in other cases without consent of the party. Please advise if you object to the use of HC information provided in the access costing case (TR-2001-65) in the rebalancing case. Thanks in advance for your cooperation in this matter.

Very truly yours,

A handwritten signature in black ink that reads "Michael F. Dandino".

Michael F. Dandino
Senior Public Counsel

by room

MFD:kh

cc: John Idoux

Exhibit A



Lisa Creighton Hendricks
Senior Attorney

State External Affairs
6450 Sprint Parkway
Overland Park, KS 66251
KSOPHN0212-2A253
Voice 913 315 9363
Fax 913 523 9829
PCS 913 461 5765
lisa.c.creightonhendricks@mail.sprint.com

May 20, 2004

FILE COPY

Michael F. Dandino
Office of the Public Counsel
Governor Office Building
P.O. Box 2230
Jefferson City, MO 65102

Dear Mr. Dandino:

To confirm our conversation of yesterday, and in response to your letter of May 13, 2004, Sprint does not consent to the use of any of the proprietary and confidential information from Case No TR-2001-065 for use in regard to issues in Case No. TR-2002-251. To my knowledge, Sprint has never agreed to such a request.

Further, as I indicated, your request raises several additional concerns. The Office of Public Counsel (OPC) was ordered in the 251 Case to state why Sprint's cost studies were inaccurate and not credible in its May 10, 2004 filing. In OPC's filing of May 10, 2004, OPC failed to provide any basis to conclude that Sprint's cost studies were inaccurate and not credible, other than a general discussion of loop allocation as it relates to basic local service. Sprint is at a loss to understand how OPC can now come forth and attempt to raise concerns for the first time in its May 28, 2004 filing that relate to a cost study it did not attack in its initial filing, Sprint's access cost study.

Very truly yours,


Lisa Creighton Hendricks

MAY 25 2004

Exhibit B

John B. Coffman
Public Counsel



State of Missouri

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Governor

Office of the Public Counsel
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May 19, 2004

Mr. William Haas
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Sprint Missouri, Inc.
Case No. TR-2002-251

Dear Bill:

Enclosed please find the Office of the Public Counsel's Data Request Nos. 1 through 3. Due to the May 28, 2004 deadline for Public Counsel to file its response to Sprint and the Staff's May 10, 2004 filing, Public Counsel asks you consent to respond to these data requests by May 24, 2004. Please advise immediately if you cannot or will not respond by that date.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael F. Dandino".

Michael F. Dandino
Senior Public Counsel

MFD:kh

Enclosure

Exhibit C

PUBLIC COUNSEL DATA REQUEST TO STAFF

**SPRINT MISSOURI, INC
CASE NO. TR-2002-251**

FILE COPY

REQUESTED FROM: William Haas
Christopher Thomas

DATE REQUESTED: May 19, 2004

INFORMATION REQUESTED:

Please provide the following documents:

Ben Johnson Associates (BJA) Switched Access studies in TR-2001-65 as referenced in the Affidavit of Affiant Christopher Thomas (Appendix B, p. 6) and in Exhibit 4 to Mr. Thomas' Affidavit.

REQUESTED BY: Michael F. Dandino

INFORMATION PROVIDED:

An electronic copy of the Switched Access Cost Studies and associated workpapers that Dr. Johnson prepared on behalf of Staff in Docket Number TR-2001-65 is included as an attachment to this response.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: 05/20/04

SIGNED BY: 

TITLE: Regulatory Economist II

MAY 20 2004

PUBLIC COUNSEL DATA REQUEST TO STAFF

**SPRINT MISSOURI, INC
CASE NO. TR-2002-251**

FILE COPY

REQUESTED FROM: William Haas
Christopher Thomas

DATE REQUESTED: May 19, 2004

INFORMATION REQUESTED:

Please provide all workpapers for the BJA Switched Access Studies in TR-2001-65 referenced in Data Request No. 1.

REQUESTED BY: Michael F. Dandino

INFORMATION PROVIDED:

An electronic copy of the Switched Access Cost Studies and associated workpapers that Dr. Johnson prepared on behalf of Staff in Docket Number TR-2001-65 is included as an attachment to this response.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: 05/20/04

SIGNED BY: 

TITLE: Regulatory Economist II

PUBLIC COUNSEL DATA REQUEST TO STAFF

**SPRINT MISSOURI, INC
CASE NO. TR-2002-251**

FILE COPY

REQUESTED FROM: William Haas
Christopher Thomas

DATE REQUESTED: May 19, 2004

INFORMATION REQUESTED:

Please provide any other analysis of cost studies of Sprint's basic local service and/or switched access service which Affiant Thomas reviewed, consulted, used, or referenced in preparation of his affidavit (Exhibit B).

REQUESTED BY: Michael F. Dandino

INFORMATION PROVIDED:

Affiant Thomas primarily reviewed the material that was attached to the Staff Recommendation filed on December 5, 2001 in this proceeding. It is Staff's understanding that OPC already has this information and that it is readily available from the docket. However, if copies are needed, Staff will provide them. In addition, Affiant Thomas reviewed the Direct Testimony of Dr. Ben Johnson filed on July 1, 2002 in Docket Number TR-2001-65. A copy of Dr. Johnson's Direct Testimony and Schedules 1-7 and 9 have been e-mailed to Mr. Dandino. Schedule 8 is too large to include as an e-mail attachment and can easily be obtained through the Commission's EFIS.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: 05/20/04

SIGNED BY: 

TITLE: Regulatory Economist II

MAY 20 2004



*****Highly Confidential*****

Switched Access Cost Studies

Prepared by Ben Johnson Assoc., Inc.

On behalf of the MO PSC

July 3, 2002 – Docket No. TR-2001-65

In Response to OPC DRs in TR-2002-251

