

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

FILED<sup>2</sup>

APR 25 2006

Missouri Public  
Service Commission

PETITION OF SOCKET TELECOM, LLC )	CASE NO. TO-2006-0299
FOR COMPULSORY ARBITRATION )	
OF INTERCONNECTION )	
AGREEMENTS WITH CENTURYTEL )	
OF MISSOURI, LLC AND SPECTRA )	
COMMUNICATIONS, LLC PURSUANT )	
TO SECTION 252(b)(1) OF THE )	
TELECOMMUNICATIONS ACT OF )	
1996 )	

**CENTURYTEL'S RESPONSES  
TO SOCKET TELECOM'S FIRST SET OF DATA REQUESTS**

CenturyTel of Missouri, Inc. and Spectra Communications Group, LLC (together "CenturyTel") submit the below Responses to Socket Telecom's ("Socket") First Set of Data Requests. Nothing in these Responses shall be construed as a waiver of objections to these Data Requests as contained in CenturyTel's Objections to Socket's First Set of Data Requests and Statement Regarding Response Date filed on February 21, 2006.

**RESPONSES TO DATA REQUESTS**

**Data Request 1**

Please identify each rate element and the associated recurring and non-recurring rate or rates for each rate element being proposed by CenturyTel in this case.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

See Article VII – Appendix Pricing.

Exhibit No. 6  
Case No(s) MO-2006-0299  
Date 4-12-06 Rptr KF

**Data Request 2**

For each rate identified in Data Request 1, please identify the source of that rate.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

CenturyTel adopted the Verizon rates.

**Data Request 3**

For each rate identified in Data Request 1, please state whether CenturyTel will be supporting that rate with a study or studies.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

At this time, CenturyTel does not have access to the study or studies in which Verizon might have utilized in the determination of the rates referenced in Data Request 1. If, during the course of this proceeding, CenturyTel gains access to the Verizon cost studies or develops cost studies that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006.

**Data Request 4**

For each rate identified in Data Request 1, please identify any study or studies that relate, mention or pertain to each rate identified. Identify the study by name and state the date the study was completed.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

CenturyTel does not have cost studies or other supporting documents at this time. If, during the course of this proceeding, CenturyTel develops cost studies that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006.

**Data Request 5**

For each study identified in Data Request 4, please state whether that study is specific to Missouri.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

CenturyTel does not have cost studies or other supporting documents at this time and therefore cannot identify whether they are Missouri-specific. If, during the course of this proceeding, CenturyTel develops cost studies that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006 and will identify whether they are Missouri-specific.

**Data Request 6**

Please provide copies of all studies that will be used to support rate elements proposed by CenturyTel.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

CenturyTel does not have cost studies or other supporting documents at this time. If, during the course of this proceeding, CenturyTel develops cost studies that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006.

**Data Request 7**

For each study provided in Data Request 6, please provide copies of all work papers and supporting documentation.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

CenturyTel does not have cost studies or other supporting documents for existing cost studies at this time. However, CenturyTel attaches its TELRIC template which it intends to use to create cost studies during this proceeding. This template is proprietary and highly confidential. If, during the course of this proceeding, CenturyTel develops cost studies or other supporting documents that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006.

**Data Request 8**

For CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, please state each entities' proposed Missouri Avoided Cost Discount use for resale purposes.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

- a. The Missouri avoided cost discount for CenturyTel of Missouri is 14.2%.
- b. The Missouri avoided cost discount for Spectra Communications Group is 17.5%.

**Data Request 9**

Please provide copies of all studies used to calculate or that otherwise relate to the proposed Missouri Avoided Cost Discount.

**RESPONSE:**

The parties have agreed to narrow discovery to the rates which remain in dispute. Subject to that, CenturyTel files the following answers:

Enclosed are the cost studies for the Missouri avoided cost discounts of CenturyTel of Missouri and Spectra Communications Group. These studies are proprietary and confidential. If, during the course of this proceeding, CenturyTel develops additional cost studies that are responsive to this request, such cost studies will be produced in a rolling fashion beginning March 15, 2006.

Respectfully submitted,

FISCHER & DORITY, P.C.

/s/ Larry W. DORITY

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/s/ David F. Brown

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ATTORNEYS FOR CENTURYTEL OF  
MISSOURI, LLC and SPECTRA  
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### STATEMENT OF TRUTHFULNESS

As Director of Economic Analysis for CenturyTel, I have sufficient knowledge to attest to the truthfulness and accuracy of these responses. I hereby certify that the above answers and responses are truthful and correct to the best of my knowledge.

  
Ted M. Hankins, Director of Economic Analysis

### CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was e-mailed and mailed, U.S. Mail, postage paid, this 1st day of March 2006 upon:

Bill Magness  
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