BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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

SOCKET TELECOM, LLC'S RESPONSES TO CENTURYTEL OF MISSOURI, LLC AND SPECTRA COMMUNICATIONS, LLC'S FIRST SET OF DATA REQUESTS

Socket Telecom, LLC ("Socket") submits the following Responses to CenturyTel Of

Missouri, LLC and Spectra Communications, LLC's First Set of Data Requests pursuant to

4 C.S.R. 240-2.090(2).

Respectfully submitted,

CASEY, GENTZ & MAGNESS, L.L.P.

/s/ Bill Magness

Bill Magness, TX #12824020
98 San Jacinto Blvd., Suite 1400
Austin, Texas 78701
(512) 480-9900
(512) 480-9200 (FAX)
bmagness@phonelaw.com

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.
Carl J. Lumley, #32869
Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@lawfirmemail.com

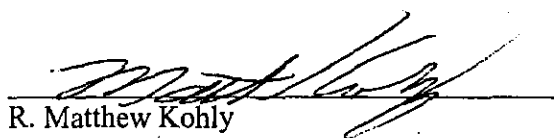ATTORNEYS FOR SOCKET TELECOM, LLC

FILED²
APR 2 5 2006
Missouri Public
Service Commission

Exhibit No. 5
Case No(s). TO 2006-0299
Date 4-11-06 Rptr KF

EXHIBIT
5

1

STATEMENT OF TRUTHFULNESS

As Director of Carrier Relations for Socket Telecom, I have sufficient knowledge to attest to the truthfulness and accuracy of these responses. I hereby certify that the answers and responses herein are truthful and correct to the best of my knowledge.

R. Matthew Kohly

CERTIFICATE OF SERVICE

I hereby certify that, on the 9th day of March, 2006, the undersigned has caused a complete copy of the attached documents to be served, via electronic mail, on:

Larry W. Dority
FISCHER & DORITY, P.C.
101 Madison, Suite 400
Jefferson City, Missouri 65101
(573) 636-6758
(573) 636- 0383 (Fax)
E-mail: lwdority@sprintmail.com

and

David F. Brown
HUGHES & LUCE, LLP
111 Congress Avenue, Suite 900
Austin, Texas 78701
(512) 482-6867
(512) 692-3843 (Fax)
E-mail: david.brown@hughesluce.com

/s/ Bill Magness
_____
Bill Magness

Case No. TO-2006-0299
Socket's Response to
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RESPONSES TO DATA REQUESTS

Data Request No. 1

For each disputed rate element in this proceeding, please identify Socket's proposed recurring and non-recurring rate or rates ("Rate" or "Rates").

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Each rate proposed by Socket is set forth in Article 7, Appendix UNE Pricing, filed with Socket's petition for arbitration. A more complete listing of rates was included in the attachment to the Article 7, Appendix UNE Pricing Joint DPL ("Article 7 Attachment"). These documents were publicly filed and previously provided to CenturyTel.

For CenturyTel's convenience, the document is also attached as an Excel file entitled "Response to DR 1a."

Responsible Person: R. Matthew Kohly

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Data Request No. 2

For each Rate, please identify the source of that Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Column G of Article 7 Attachment identifies the source of the recurring rates.
Column H of Article 7 Attachment identifies the source of the non-recurring rates.

In Columns G and H, the reference "AT&T – GTE" means the rate is from the AT&T
GTE Agreement. The reference "SBC" means the rate is from the Interconnection
Agreement between SBC Missouri and Socket Telecom, LLC. The reference "FCC
Tariff" means the rate was taken from the appropriate interstate tariff.

The only exception is Socket's proposed rate for DS1 and DS3 Loops, which were taken
from the interstate tariffs of CenturyTel of Missouri, LLC and Spectra Communications
Group, LLC d/b/a CenturyTel. The relevant tariff sheets are:

CenturyTel Missouri
FCC No. 2, Section 5, 2nd Revised Page 5-202
FCC No. 2, Section 5, 3rd Revised Page 5-177

Spectra
National Exchange Carrier Association, Tariff No. 5, Section 17, 29th Revised Page 17-
26 and 24th Revised Sheet 17-17

Socket deaveraged these rates in accordance with FCC guidelines using the same
methodology as used by the Commission in setting the final rates for 4-wire loops in
Case No. TO-97-67. The deaveraging analysis is included in the attached spreadsheet,
entitled "Resp to DR 2a."

Responsible Person: R. Matthew Kohly

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Data Request No. 3

For each Rate, please produce copies of all studies, if any, that relate, mention or pertain to Socket's proposed Rate (the "Studies").

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Generally, Socket's proposed rates were found to be cost based in other dockets so Socket is not supporting these proposed rates with specific cost studies in this case.

Responsible Person: R. Matthew Kohly

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Data Request No. 4

For each Rate, please produce a copy of all work papers and supporting material/documentation relating to the Studies relating, mentioning or pertaining to those Rates.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 5

For each Rate, explain whether the proposed Rate is cost-based and, if so, identify all underlying cost assumptions used to develop the proposed Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 6

For each Rate, please explain in detail the methodology utilized to derive the proposed Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 7

For each proposed non-recurring Rate, please produce all documents relating to the underlying assumptions (*e.g.*, job functions involved, tasks, labor Rates, time and motion studies) used to derive the Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 8

For each Rate, please identify the cost of capital used to derive the proposed Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 9

For each recurring Rate, please identify the fill factor used to derive the proposed Rate.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request Nos. 2 and 3.

Responsible Person: R. Matthew Kohly

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Data Request No. 10

Identify each performance measurement Socket proposes in this proceeding ("Performance Measurement").

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Each Performance Measurement being proposed by Socket in this proceeding is set forth in Article XV of Socket's arbitration petition.

Responsible Person: R. Matthew Kohly

Case No. TO-2006-0299
Socket's Response to
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Data Request No. 11

For each Performance Measurement, please produce all documents relating, mentioning or pertaining to CenturyTel's performance with respect to the underlying service or task being measured over the last two (2) years.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket has not been measuring CenturyTel's performance under these measurements during the last two years and has not tied CenturyTel's performance to specific measures. Attached are electronic files of documents relating to CenturyTel's overall performance; these files are designated with names beginning "DR 11 ...."

See also the attached Excel files that contain customer trouble tickets. These files are designated HIGHLY CONFIDENTIAL and are produced pursuant to the Protective Order entered in this case. The documents are classified as HIGHLY CONFIDENTIAL because they contain "information relating directly to specific customers." Consequently, distribution of this information is restricted as designated in the Protective Order.

Responsible Persons: R. Matthew Kohly
Kurt Bruemmer (trouble tickets)

Case No. TO-2006-0299
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Data Request No. 12

For each Performance Measurement, please identify every month in the last two (2) years in which CenturyTel's performance would have resulted in remedies paid to Socket under the proposed plan.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See response to Data Request No. 11. Socket has not performed the specific analysis referenced in this Data Request No. 12.

Responsible Person: R. Matthew Kohly

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Data Request No. 13

For each month identified in response to the preceding data request, please state the amount of remedies that would have been due to Socket from CenturyTel if Socket's proposed plan had been in effect.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See response to Data Request Nos. 11 and 12. Socket has not performed the specific analysis referenced in this Data Request No. 13.

Responsible Person: R. Matthew Kohly

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Data Request No. 14

For each month over the last two years in which CenturyTel would have been obligated to pay remedies to Socket, please produce all documents relating to the harm, if any, Socket experienced as a result of CenturyTel's performance.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See response to Data Request Nos. 11, 12, and 13. Since Socket has not performed the analyses contemplated by these Data Requests, Socket is unable to respond to this Data Request No. 14.

Responsible Person: R. Matthew Kohly

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Data Request No. 15

For each Performance Measurement, identify the source of Socket's proposal (*e.g.*, M2A, successor to the M2A, etc).

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket created an informal working group comprised of Socket's internal engineering group as well as outside consultants to analyze each step in the Pre-Order, Ordering and Provisioning, and Maintenance and Repair process and identify known and/or potential points of delay and/or failure occurring as a result of sub-parity performance on the part of the ILEC. For each point identified, the group sought ways to measure the performance. As part of this process, the group looked first to existing measurements found in the Interconnection Agreements between CenturyTel and Socket, the M2A replacement agreement in effect between SBC Missouri and Socket, as well as the Missouri Public Service Commission's Quality of Service Rules.

Responsible Person: R. Matthew Kohly

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Data Request No. 16

For each Performance Measurement, please produce all documents and material relating, mentioning or pertaining to the proposed Measure.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See Interconnection Agreement between AT&T – GTE that was adopted by Socket in Case No. TK-2002-1085. CenturyTel should have a copy of this document within its possession.

See also attached files, named "Resp to DR16a" and "Resp to DR16b".

The working group referenced in Data Request No. 15 worked from a single electronic document that was created and edited during the course of the discussions. That document resulted in the list of Performance Measures that are included in Article XV, filed with Socket's arbitration petition. Consequently, there are no documents responsive to this Request that were created by working group other than Article XV.

Responsible Person: R. Matthew Kohly

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Data Request No. 17

Describe in detail the methodology utilized in deriving Socket's proposed remedies for failing to satisfy proposed Performance Measurements.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See Response to Data Request No. 15.

Responsible Person: R. Matthew Kohly

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Data Request No. 18

For each liquidated damage provision contained in Socket's proposed Article XV to the parties' interconnection agreement, explain in detail the methodology for establishing the proposed liquidated damage amount.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

See Response to Data Request No. 15.

Responsible Person: R. Matthew Kohly

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Data Request No. 19

For each performance interval or time standard set forth in Socket's proposed Article XV to the parties' interconnection agreement, please explain in detail the methodology by which Socket established the proposed interval/time standard, identify the corresponding benchmarks and remedies applicable to AT&T Missouri in its successor ICA approved by the Commission, and produce all documents relating, mentioning or pertaining to the measurement at issue.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See Responses to Data Request Nos. 15 and 16.

Responsible Person: R. Matthew Kohly

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Data Request No. 20

Please produce all documents relating, mentioning, or pertaining to the impact, economic or otherwise, of CenturyTel's failure to provide service at the standards set forth in Socket's proposed Article XV.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket has not analyzed CenturyTel's performance in the context of the specific measures being proposed by Socket. For that reason, no documents responsive to this Data Request No. 20 exist.

Responsible Person: R. Matthew Kohly

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Data Request No. 21

Please produce all studies, analyses, forecasts and other material that relates, mentions or pertains to Socket's anticipated, expected or forecasted demand for CenturyTel facilities or services.

Socket's Response:

See filed objections.

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Data Request No. 22

Identify with specificity each POI Socket has established with CenturyTel in Missouri ("Socket POI").

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

As a POI with CenturyTel is the interconnection of Socket's network with CenturyTel's network, this information is already within the CenturyTel's possession, custody, or control.

Responsible Person: R. Matthew Kohly

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Data Request No. 23

For each Socket POI, please state the costs to Socket of establishing the POI and produce all documents relating, mentioning or pertaining to those costs.

Socket's Response:

See filed objections.

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Data Request No. 24

Please produce all documents relating, mentioning, or pertaining to the relative cost to Socket of establishing a POI in each CenturyTel local calling area as opposed to establishing a single POI in each LATA.

Socket's Response:

See filed objections.

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Data Request No. 25

Please produce documents, diagrams, charts, or the like depicting Socket's current network architecture in Missouri.

Socket's Response:

See filed objections.

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Data Request No. 26

Please describe the current process for Socket to establish interconnection with CenturyTel and produce all documents relating, mentioning, or pertaining thereto.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

According to CenturyTel's representations made during negotiation, the current process for Socket to establish interconnection with CenturyTel is set forth in the CenturyTel Service Guide. However, Socket is unable to find any information regarding establishing interconnection with CenturyTel in the CenturyTel Service Guide.

Socket's own experience is that the process is largely undefined and varies over time. In addition, CenturyTel and Socket have had ongoing disputes over the number of POIs required per LATA. Socket attempted to submit this matter to the Commission for resolution but CenturyTel refused.

Generally, the process has been that Socket places an order for trunking facilities via an ASR. CenturyTel's Access Service Group reviews that order and then submits the order to Susan Smith for Regulatory Review. If the order is not rejected at that time, Socket will receive a FOC and the order will generally be processed at some point in time if facilities are available. In the event facilities are not available, Socket's order is not processed but rather sits in queue until facilities become available. Socket is not given any indication of when or if facilities will be available. In the past, Socket's orders for interconnection facilities have been rejected during the regulatory review process for the stated reason that Socket does not have an approved forecast. While Socket has submitted forecasts on a timely basis, one has never been rejected by CenturyTel so it is unclear to Socket how a forecast becomes "approved."

Responsible Person: R. Matthew Kohly

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Data Request No. 27

Please describe with specificity the various traffic types Socket anticipates transporting over facilities interconnected with CenturyTel facilities (*e.g.*, local, toll, ISP-bound, VoIP, IP-in-the-middle, etc.).

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket anticipates transporting each of the traffic types identified in Socket's proposed Article V. This would include Section 251(b)(5) Traffic, Foreign Exchange Traffic, ISP Traffic, IP Traffic, Non-PIC'd IntraLATA toll traffic, and IXC Meet-Point Traffic. Socket has no plans to transport IP-in-the-middle traffic at this point in time.

Responsible Person: R. Matthew Kohly

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Data Request No. 28

For each traffic type identified in response to Data Request No. 27, please state the relative percentage of overall anticipated volume of traffic (*e.g.,* 10% local, 10% toll, 10% ISP-bound, etc.).

Socket's Response:

      See filed objections.

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Data Request No. 29

For each traffic type identified in response to Data Request No. 27, please identify the type of Socket customer to which Socket will terminate the anticipated traffic (*e.g.*, ISP, IXC, end user, etc.)

Socket's Response:

See filed objections.

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Data Request No. 30

For each traffic type identified in response to Data Request No. 27, please identify the type of customer for which Socket anticipates transporting the traffic.

Socket's Response:

> See filed objections.

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Data Request No. 31

As used in Socket's proposed contract language, please explain what is meant by the phrase "interconnection facilities" and specifically identify the type of facilities (*i.e.*, start and end points, capacity, etc.) to which the phrase applies.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

An "interconnection facility" is a facility that connects two or more networks.

Responsible Person: R. Matthew Kohly

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Data Request No. 32

Please produce all documents relating, mentioning or pertaining to the costs to Socket of deploying one-way versus two-way trunking facilities for interconnection with CenturyTel.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

Socket has no such documents.

Responsible Person: R. Matthew Kohly

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Data Request No. 33

Please produce all documents relating, mentioning, or pertaining to the costs to Socket of deploying separate facilities to transport local versus non-local traffic, as opposed to aggregating the traffic over the same facilities.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

Socket has no such documents.

Responsible Person: R. Matthew Kohly

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Data Request No. 34

Please produce all documents relating, mentioning, or pertaining to the costs to Socket of deploying direct end office trunking to CenturyTel end offices.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

Socket has not conducted any analysis to determine the cost of deploying its own trunking to CenturyTel end offices. To the extent this question relates to the cost of leasing facilities from CenturyTel, those would be as follows.

DS1 trunks - $24.50 for each termination, $0.61 per air line mile.
DS3 trunks - $257.83 for each termination, $15.72 per air-line mile.

To the extent any other documents exist that could be considered responsive to this Data Request, they were prepared in anticipation of litigation and are therefore privileged.

Responsible Person: R. Matthew Kohly

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Data Request No. 35

Please produce all documents relating, mentioning, or pertaining to CLEC forecasted demand for CenturyTel UNEs and/or resale lines in the State of Missouri over the next (a) 10 years and (b) 5 years.

Socket's Response:

See filed objections.

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Data Request No. 36

Please state the total number of CenturyTel UNE and resale lines Socket forecasts CLECs using in the State of Missouri over the next (a) 1 year, (b) 5 years, and (c) 10 years.

Socket's Response:

See filed objections.

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Data Request No. 37

Does Socket contend that it is not obligated to reimburse CenturyTel for forward-looking development and/or operational costs associated with OSS? If your answer is yes, please explain the basis for your response.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket has not yet finalized its position on this issue. Socket expects to determine its position in the course of drafting direct testimony and will explain its position at that time.

Responsible Person: R. Matthew Kohly

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Data Request No. 38

Please state the monthly recurring charge, if any, Socket contends would be appropriate for access to the CenturyTel OSS Socket describes in its proposed contract language.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket does not have a specific proposed rate. In the event that Socket determines that it is obligated to reimburse CenturyTel for any costs associated with OSS, then Socket would expect CenturyTel to prepare valid cost studies in order to properly ascertain a reasonable rate.

Responsible Person: R. Matthew Kohly

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Data Request No. 39

Please describe in detail all purported deficiencies in CenturyTel's Service Ordering Guide.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

It would be overly burdensome to describe in detail all of the deficiencies of CenturyTel's Service Ordering Guide. In general, the Service Ordering Guide is extremely lacking in detail, the contacts are not current, the sample screens that are intended to represent screens on a customer service record are not current, the provisioning intervals are not binding and are not accurate. For example, they do not include the additional two days that CenturyTel adds to each order to permit CenturyTel to retype the order into their systems. Socket will address these and other deficiencies in more detail in testimony.

Responsible Person: R. Matthew Kohly

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Data Request No. 40

Please produce all documents relating, mentioning, or pertaining to any difficulties experienced by Socket when using the pre-ordering, ordering, provisioning and/or maintenance procedures set forth in CenturyTel's Service Ordering Guide.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

See the Socket's response to Data Request No. 39.

Responsible Person: R. Matthew Kohly

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Data Request No. 41

Please identify specifically any and all Non-Recurring Charges (NRCs) applicable to resold services to which Socket believes an avoided cost discount or wholesale discount applies.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

It is Socket's position that the avoided cost discount applies to the retail charges for all resold services except for those specifically set forth in Socket's proposed language in Article VI as not subject to a discount.

Responsible Person: R. Matthew Kohly

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Data Request No. 42

With respect to Resale Issue No. 18, please explain what costs can be avoided from the price of Customer Specific Pricing Agreements.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

It is Socket's position that, for the purpose of determining avoided costs, there is nothing that differentiates a product sold via a customer specific price as compared to a product sold via a tariffed rate.

Responsible Person: R. Matthew Kohly

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Data Request No. 43

With respect to UNE Issue No. 1, please identify any UNEs or combinations of UNEs currently provided to Socket by CenturyTel that are subject to a transition plan pursuant to any FCC order or rule.

Socket's Response:

See filed objections.

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Data Request No. 44

With respect to Article I: Scope of Agreement, please identify with specificity each of the "certain commitments" referred to in Socket's proposed contract language and, for each, produce all documents that relate, mention or pertain to those "certain commitments."

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

These commitments are set out in the Report and Order and as well as the testimony and other filings made in Case Nos. TM-2000-182 and TM-2002-232.

Responsible Person: R. Matthew Kohly

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Data Request No. 45

With respect to the parties' dispute concerning Socket's proposed section 1.13 in Article II: Definitions, Issue No. 4, please identify with specificity the CenturyTel "affiliates" referred to in your proposed language, and, for each, state whether the "affiliate" is a regulated entity and produce all documents that relate, mention or pertain to all business dealings Socket has with the "affiliate."

Socket's Response:

      See filed objections.

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Data Request No. 46

For each Rate, please identify with specificity all interim Rates, if any, you propose and produce all documents mentioning, relating or pertaining to those interim Rates.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket proposed that the rates for xDSL Loops, xDSL Subloops, Loop Conditioning, cross-connects, Removal of Non-Excessive Bridged Tap be interim.

Responsible Person: R. Matthew Kohly

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Data Request No. 47

Produce copies of all documents relating, mentioning or pertaining to Socket's arrangements for directory assistance, interconnection, OSS, and intercarrier compensation with other LECs.

Socket's Response:

See filed objections.

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Data Request No. 48

Produce copies of all documents relating, mentioning or pertaining to Socket's marketing and/or business plans for the State of Missouri involving Socket's use of UNEs and/or resale lines.

Socket's Response:

See filed objections.

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Data Request No. 49

Please identify all current Socket customers, as well as identified prospective Socket customers, for services offered in the State of Missouri using UNEs and/or resale lines.

Socket's Response:

See filed objections.

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Data Request No. 50

In Article V: Interconnection and Transport and Termination of Traffic, Socket proposes the following language in section 9.8.1:

> *The transport and termination compensation for FX traffic will be Bill and Keep.*
> *To the extent that ISP-Bound traffic is provisioned via FX or FX-type arrangements, it is subject to the compensation mechanism of Bill and Keep.*

a. Is Socket currently providing or intending to provide service that would involve "ISP-Bound Traffic . . . provisioned via FX or FX-type arrangements" for dial-up internet traffic originating from CenturyTel of Missouri or Spectra exchanges ("ISP-Bound FX Traffic")?

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Yes.

b. Please identify the Socket Rate Center, Rating Point, and Routing Point for all such ISP-Bound FX Traffic. Answer this Data Request using the definitions of Rate Center, Rating Point, and Routing Point proposed by Socket in Article II: Definitions, §§ 1.103, 1.104, and 1.108.

Socket's Response:

See filed objections.

c. Please identify the service location for Socket's ISP customer for any such ISP-Bound FX Traffic and the physical location to which Socket delivers such traffic to its ISP customers.

Socket's Response:

See filed objections.

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d.   With respect to ISP-Bound FX Traffic, please describe the rates and rate structure that Socket applies to such services and produce all documents relating, mentioning or pertaining to those rates and rate structures. Do those rates vary depending upon (i) the number of telephone numbers assigned to the customer, (ii) the amount of traffic that is delivered to the customer, and/or (iii) the number of exchanges or local calling areas that are allowed to call the ISP customer toll-free?

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

Socket's rates are set forth in its tariff, which is publicly available for CenturyTel's review.

e.   Please identify each NPA/NXX code or number block group that Socket has obtained and has rated to a Rating Point located within a CenturyTel of Missouri or Spectra local exchange. For each NPA/NXX code or number block, please state the associated CenturyTel of Missouri or Spectra exchange.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

This information is readily available in the Local Exchange Routing Guide and hence is within CenturyTel's possession, custody, or control.

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f.   With regard to the NPA/NXX codes or number blocks identified in Data Request No. 50(e), please state the percentage of traffic terminated by Socket to these numbers that constitutes ISP-Bound FX Traffic.

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as

follows:

Socket has not performed the requested analysis as Socket has no business need to conduct such analysis and Socket does not have a process in place to segregate FX traffic between ISP-bound traffic and non-ISP-bound traffic.

Responsible Person: R. Matthew Kohly

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Data Request No. 51

Please produce all studies, analyses, forecasts and other material that relates, mentions or pertains to the anticipated, expected or forecasted CLEC demand for CenturyTel UNEs and/or resale over the next ten years. At a minimum, produced material should relate at least to forecasted demand for the following:

       a.   DS1 loops
       b.   DS1 transport
       c.   DS3 loops
       d.   DS3 transport
       e.   DS0 loops
       f   DS0 transport
       g.   interconnection facilities
       h.   resold services
       i.   xDSL-capable loops
       j.   xDSL-capable subloops

Socket's Response:

See filed objections. Subject to and without waiving its objections, Socket responds as follows:

Socket Telecom has not performed any demand analysis for loops, transport, or resold services and does not believe such an analysis could produce a useful result. The future demand for these items is dependent upon many factors that are unknown at this time.

Socket has produced forecasts for interconnection facilities and previously provided those to CenturyTel as required by the parties' interconnection agreements. Such forecasts are therefore already in CenturyTel's possession.

Responsible Person: R. Matthew Kohly

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Socket's Response to
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March 9, 2006

Data Request No. 52

Please produce all studies, analyses, forecasts and other material that relates, mentions or pertains to the anticipated, expected or forecasted demand of Socket for CenturyTel xDSL-capable loops and subloops over the next ten years.

Socket's Response:

See filed objections.