

COVER SHEET



0000008581

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL CENTER

CASE/COMPANY NAME:

DOCKET NO. T - 00000 B - 97 - 0238

US West Compliance With §271 Of The
Telecommunications Act

D/B/A or RESPONDENT:

RECEIVED
AZ CORP COMMISSION
Mar 23 12 52 PM '99

DOCUMENT CONTROL

NATURE OF ACTION OR DESCRIPTION OF DOCUMENT

Please mark the item that describes the nature of the case/filing:

01 UTILITIES - NEW APPLICATIONS

- NEW CC&N
RATES
INTERIM RATES
CANCELATION OF CC&N
DELETION OF CC&N (TERRITORY)
EXTENSION OF CC&N (TERRITORY)
TARIFF - NEW (NEXT OPEN MEETING)
REQUEST FOR ARBITRATION
FULLY OR PARTIALLY ARBITRATED
INTERCONNECTION AGREEMENT
VOLUNTARY INTERCONNECTION
AGREEMENT (Telecom. Act)

- MAIN EXTENSION
CONTRACT/AGREEMENTS
COMPLAINT (Formal)
RULE VARIANCE/WAIVER REQUEST
SITING COMMITTEE CASE
SMALL WATER COMPANY -SURCHARGE
SALE OF ASSETS & TRANSFER OF OWNERSHIP
SALE OF ASSETS & CANCELLATION OF CC&N
FUEL ADJUSTER/PGA
MERGER
FINANCING
MISCELLANEOUS

Specify

Arizona Corporation Commission
DOCKETED

Mar 23 1999

Senate Bill 252

02 UTILITIES - REVISIONS/AMENDMENTS TO
PENDING OR APPROVED MATTERS

- APPLICATION
COMPANY
DOCKET NO.

- TARIFF
PROMOTIONAL
COMPLIANCE

SECURITIES or MISCELLANEOUS FILINGS

- AFFIDAVIT
EXCEPTIONS
REQUEST FOR INTERVENTION
REQUEST FOR HEARING
OPPOSITION
COMPLIANCE ITEM FOR APPROVAL
TESTIMONY
COMMENTS

- STIPULATION
NOTICE OF INTENT
PETITION
NOTICE OF LIMITED APPEARANCE
OTHER
Response to US WEST Motion to Compel

2/26/99

Date

Sprint Communications Company L.P. / Donald A. Low / Senior Attorney

Print Name of Applicant/Company/Contact person/Respondent/Atty.
913 624-6865

Phone

PLEASE SEE NOTICE ON REVERSE SIDE

BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN

Chairman

CARL J. KUNASEK

Commissioner

TONY WEST

Commissioner

IN THE MATTER OF U S WEST) Docket No. T-0000B-97-0238
COMMUNICATIONS, INC'S) SPRINT'S SUPPLEMENTAL
COMPLIANCE WITH §271 OF THE) RESPONSES TO U S
TELECOMMUNICATIONS ACT OF) WEST'S FIRST SET OF DATA
1996) REQUESTS

Sprint Communications Company L.P. (Sprint) hereby provides supplemental responses to "U S WEST's First Set of Data Requests to Sprint Communications Company L.P." as follows:

GENERAL OBJECTIONS

Arizona Corporation Commission
DOCKETED

Sprint makes these General Objections to the U S WEST Requests and incorporates each of the General Objections into its specific objections to each of the Requests.

MAR 23 1999
DOCKETED BY: [Signature]

A. Sprint objects to the Requests in their entirety to the extent they purport to impose obligations and/or duties upon Sprint beyond those required by the rules, procedures, and orders of the Commission. Sprint also objects to the Requests to the extent that the response called for exceeds that required by any order, regulation or rule of the Commission.

B. Sprint objects to the Requests in their entirety to the extent they seek documents that U S WEST already has received or has access to from

public sources. Providing such documents would be unnecessarily cumulative and unduly burdensome.

C. Sprint objects to the Requests in their entirety to the extent that they seek information that is privileged or otherwise exempt from discovery, including but not limited to documents or information protected by the attorney-client privilege and the work-product doctrine. Sprint will not produce any privileged or exempt documents or information. Sprint further objects to the production or disclosure of any proprietary, confidential or trade secret information unless pursuant to a protective order or nondisclosure agreement which protects the confidentiality of such information.

D. Sprint further objects to each Request to the extent it imposes an obligation upon Sprint to copy documents or other material in violation of any proprietary or nondisclosure agreements.

E. Sprint will make a reasonable effort to respond to each Request as Sprint understands and interprets the Request. If U S WEST should assert an interpretation of any Request that differs from Sprint's, Sprint reserves the right to supplement or amend its objections and responses. Sprint further reserves the right to produce responsive documents or information received after the filing of this Response.

F. Sprint expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity or relevancy of the documents produced pursuant to this data request.

SUPPLEMENTAL RESPONSES TO SPECIFIC DATA REQUESTS

REQUEST NO. 2:

Please identify each U S WEST central office or other location in Arizona where Sprint collocates or intends to collocate within the next 24 months. For each projected location where Sprint intends to collocate with U S WEST within the next 24 months, state whether Sprint intends to collocate physically or virtually, and produce all documents relating to these collocation plans. (Checklist Item No. 1)

Response:

Sprint has provided U S WEST with the information it requests. Plans for collocation were sent to U S WEST collocation coordinator, Peggy Englert, on December 23, 1999. Sprint initially requested collocation in 151 offices. Later two central offices were found to be duplicates, revising the total to 149.

REQUEST NO. 26:

For each facilities-based, local telecommunications service that Sprint provides in any of the states in U S WEST's region, describe all provisioning commitments or representations that Sprint gives to its customers, including but not limited to: (1) the average, anticipated time interval for installing the service; and (2) the average, anticipated amount of time the customer will be out of service to allow for a change of carriers through a loop cut-over. State whether the provisioning commitments or representations that Sprint provides vary at all depending on whether Sprint is using facilities provided by U S WEST or facilities provided by some other source. Produce all documents that reflect, refer to, or relate to any provisioning commitments or representations that Sprint provides to its customers for each such facilities-based, local telecommunications service that Sprint provides in U S WEST's region.

Response:

During Sprint's telephone conference with U S WEST attorney Chuck Steese, Sprint was made aware that U S WEST's data request no. 26 seeks information not limited to Sprint's CLEC operation. Mr. Steese informed Sprint that the above data request specifically seeks information related to Sprint's local exchange company, an entity which is not engaged in the provision of telecommunications service in Arizona.

In light of U S WEST's clarification of its data request, Sprint reasserts its earlier relevance objection.

REQUEST NO. 27.

Produce copies of all documents relating to presentations, marketing materials, sales efforts and related materials that Sprint representatives use in their discussions with local exchange customers or in mass marketing of customers to promote or sell any local telecommunications service in U S WEST's region, including, but not limited to, written scripts and other prepared presentations.

Response:

During Sprint's telephone conference with U S WEST attorney Chuck Steese, Sprint was made aware that U S WEST's data request no. 27 seeks information not limited to Sprint's CLEC operation. Mr. Steese informed Sprint that the above data request specifically seeks information related to Sprint's local exchange company, an entity which is not engaged in the provision of telecommunications service in Arizona.

In light of U S WEST's clarification of its data request, Sprint reasserts its earlier relevance objection.

REQUEST NO. 28.

Please state whether Sprint measures or tracks in any way the time per call that its local service sales and marketing representatives spend on the telephone with customers to promote or sell Sprint's local telecommunications services and to arrange for provisioning services. If Sprint does measure or track the time for these calls, describe the nature of the information it records, and produce all documents that contain, refer, or relate to data of this type for all states in U S WEST's region.

Response:

During Sprint's telephone conference with U S WEST attorney Chuck Steese, Sprint was made aware that U S WEST's data request no. 28 seeks information not limited to Sprint's CLEC operation. Mr. Steese informed Sprint that the above data request specifically seeks information related to Sprint's local exchange company, an entity which is not engaged in the provision of telecommunications service in Arizona.

In light of U S WEST's clarification of its data request, Sprint reasserts its earlier relevance objection.

REQUEST NO. 29.

Please state the hours of operation for Sprint's local exchange units or offices in Arizona and in the other 13 states in U S WEST's region, and produce documents that show the hours of operations for these units or offices.

Response:

During Sprint's telephone conference with U S WEST attorney Chuck Steese, Sprint was made aware that U S WEST's data request no. 29 seeks information not limited to Sprint's CLEC operation. Mr. Steese informed Sprint that the above data request specifically seeks information related to Sprint's local exchange company, an entity which is not engaged in the provision of telecommunications service in Arizona.

In light of U S WEST's clarification of its data request, Sprint reasserts its earlier relevance objection.