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<sup>5</sup>Also Certified Public Accountant

<sup>6</sup>Also Licensed in North Carolina

<sup>7</sup>Also Licensed in Georgia

<sup>8</sup>Also Admitted by U.S. Patent and Trademark Office

July 7, 2006

Ms. Mary Jo Kunkle  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way, Ste. 7  
Lansing, MI 48911

Re: In the matter of the Petition of Ace Telephone Company, et al., for the Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with Alltel Communications, Inc., Pursuant to Section 252(b) of the Federal Telecommunications Act of 1996  
MPSC Case No. U-14889

Dear Ms. Kunkle:

Enclosed for filing please find Alltel Communications, Inc.'s Request For An Order Requiring Petitioners To Produce Additional Data, Information And Documents and a Proof of Service of the same.

Please call if you have any questions regarding the enclosures.

Very truly yours,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.

Mike Ashton



Michael S. Ashton

Digitally signed by Mike Ashton  
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O = Fraser Law Firm  
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MSA/dkl  
Enclosures

cc: Steve Gatto  
Stephen B. Rowell  
Wendy Thelen  
Anne-Marie Clark  
Sharon Feldman, Administrative Law Judge

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Ace Telephone )  
Company, Allendale Telephone Company, )  
Barry County Telephone Company, Blanchard )  
Telephone Company, Bloomingdale Telephone )  
Company, Chippewa County Telephone Company )  
Deerfield Farmers' Telephone Company, )  
Hiawatha Telephone Company, Kaleva Telephone )  
Company, Midway Telephone Company, Ogden )  
Telephone Company, Ontonagon Telephone )  
Company, Pigeon Telephone Company, the )  
Upper Peninsula Telephone Company, Waldron )  
Telephone Company, and Winn Telephone )  
Company, For the Arbitration of Interconnection )  
Rates, Terms and Conditions and Related )  
Arrangements with Alltel Communications, Inc. )  
Pursuant to Section 252(b) of the Federal )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

Case No. U-14889

**Proof of Service**

STATE OF MICHIGAN )  
 ) ss.  
COUNTY OF INGHAM )

Debbie K. Lange, being first duly sworn, deposes and says that on this 7<sup>th</sup> day of July, 2006, she served a copy of Alltel Communications, Inc.'s Request For An Order Requiring Petitioners To Produce Additional Data, Information And Documents and Proof of Service for same on the following individuals by e-mail to the e-mail addresses listed below:

Wendy Thelen at wjthele@michigan.gov  
Anne-Marie Clark at clarka@michigan.gov  
Sharon Feldman, Administrative Law Judge at slfeldm@michigan.gov  
Steve Gatto at stevegatto@hotmail.com

Debbie K. Lange  
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P.C.  
Date: 2006.07.07 16:20:10 -04'00'

Debbie K. Lange

Subscribed and sworn to before me  
on this 7<sup>th</sup> day of July, 2006

Jennifer Joy  
Yocum

Digitally signed by Jennifer Joy  
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Jennifer Joy Yocum, Notary Public  
Ingham County, Michigan  
Acting in Ingham County  
My Commission Expires: 12-17-2011

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Ace Telephone )  
Company, Allendale Telephone Company, )  
Barry County Telephone Company, Blanchard )  
Telephone Company, Bloomingdale Telephone )  
Company, Chippewa County Telephone Company )  
Deerfield Farmers' Telephone Company, )  
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Company, Pigeon Telephone Company, the )  
Upper Peninsula Telephone Company, Waldron )  
Telephone Company, and Winn Telephone )  
Company, For the Arbitration of Interconnection )  
Rates, Terms and Conditions and Related )  
Arrangements with Alltel Communications, Inc. )  
Pursuant to Section 252(b) of the Federal )  
Telecommunications Act of 1996 )  
\_\_\_\_\_)

Case No. U-14889

**ALLTEL COMMUNICATIONS, INC.'S REQUEST FOR AN  
ORDER REQUIRING PETITIONERS TO PRODUCE  
ADDITIONAL DATA, INFORMATION AND DOCUMENTS**

Alltel Communications, Inc. hereby requests that the arbitration panel submit the following data requests to Petitioners and order Petitioners to provide the data, information and documents to Alltel and the arbitration panel within 5 business days. In its May 18, 2004 Order in Case No. U-13774 establishing arbitration procedures, the Commission did not provide parties the right to engage in traditional discovery. Instead, the Commission Order permits a party to "request that the arbitration panel order the production of additional information from the other party." (*Id.* at p 4.) On June 30, 2006, the panel submitted questions to both parties. For the reasons set forth in its Response to Arbitration and accompanying testimony (incorporated therein), Alltel requests that the Panel require the MECA companies produce the data, information and documents requested below. The data, information and documents are critical to

the proper determination of this arbitration proceeding. Furthermore, Alltel intends to rely upon this material in support of its position in this arbitration proceeding. Since the data, information and documents requested are in the sole possession of the Petitioners and not otherwise available to Alltel, the Arbitration Panel should require the Petitioners to produce the Data Requests based on the Definitions and Instructions as set forth below.

### **DEFINITIONS AND INSTRUCTIONS**

1. “Document” means any written, printed, typed or visually reproduced material of any kind, whether or not privileged, and includes but is not limited to the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, phonographic records, computer files, other data compilation, or any other written, recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.

2. The terms in the individual data requests should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with the Michigan Supreme Court Rules.

3. As used in these requests, the singular shall also be treated as plural and vice-versa.

4. If any part of a document is responsive to any request, the whole document is to be produced.

5. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document is a separate and distinct document and it must be produced.

6. If you are unable to produce a document in response to any request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the date and manner of its disposition and identify its last known custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

7. To the extent you claim any document described herein is privileged, or to the extent that you object to the production of any of the documents, please identify each and every document to which any claim of privilege or objection to production is asserted by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of each such document, and state in writing the nature and basis for each claim of privilege or objection for each such document.

8. Petitioners should promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised under the Michigan Court Rules.

### **DATA REQUESTS**

**ALL-MECA 1.** For each cost study referenced, and relied on, by Petitioners in this proceeding provide a complete copy of the cost study model, cost study and all supporting documentation.

The requested materials should include, but not be limited to the following:

1. A summary of the proposed rates showing the “mapping” of TSLRIC study results to the rates.
2. An electronic, executable copy of the cost study and model used to produce the TSLRIC study results.
3. Documentation describing cost methods including, but not limited to, the sizing to serve total demand, the calculation of investments and direct costs, the allocation of shared and common costs, and the computation of unit costs.
4. All work papers used to develop input data used in the model, such as in service and forecast demand, material costs and other costs of construction, economic lives and capital cost components, operating expense factors, shared cost factors, common cost factors and others. Work papers should indicate the sources and dates of data and provide copies of source documents (vendor quotes, financial accounting, etc.).

**ALLTEL COMMUNICATIONS, INC.**

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Vice President Regulatory Legal Affairs  
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**Mike  
Ashton**

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