

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On Its Own Motion

Docket No. 08-0570

vs.

ACN Communications Services, Inc.

Comcast Phone of Illinois, LLC d/b/a
Comcast Digital Phone

Charter Fiberlink-Illinois, LLC

Lightspeed Telecom, LLC

MCC Telephony of Illinois, Inc.

McLeodUSA Telecommunications
Services, Inc. d/b/a PAETEC Business
Services

nii communications, Ltd. d/b/a nii
Communications, L.P.

Cleartel Telecommunications, Inc.
d/b/a Now Telecommunications

Sage Telecom, Inc.

Sprint Communications L.P. d/b/a
Sprint Communications Company L.P.

TDS Metrocom, LLC

Talk America Inc. d/b/a Cavalier
Telephone d/b/a Cavalier Business
Communications

Trinsic Communications, Inc.

Matrix Telecom, Inc. d/b/a Matrix
Business Technologies

MCImetro Access Transmission
Services LLC d/b/a Verizon Access
Transmission Services

Cellular Properties, Inc.

Cricket Communications, Inc.

T-Mobile USA, Inc., T-Mobile Central
LLC and Powertel/Memphis, Inc.

USCOC of Central Illinois, LLC

USCOC of Illinois RSA #1, LLC

USCOC of Illinois RSA #4, LLC

USCOC of Rockford, LLC

Cellco Partnership d/b/a Verizon
Wireless

Chicago SMSA Limited Partnership
d/b/a Verizon Wireless

Illinois RSA 1 Limited Partnership
d/b/a Verizon Wireless

Illinois RSA 6 & 7 Limited Partnership
d/b/a Verizon Wireless

Illinois SMSA Limited Partnership
d/b/a Verizon Wireless

Rockford SMSA Limited Partnership
d/b/a Verizon Wireless

Collection of information relative to
the tariff filings by Illinois Bell
Telephone Company reclassifying
certain services as competitive

**RESPONSES AND OBJECTIONS TO TELECOMMUNICATIONS DIVISION
STAFF REPORT TO T-MOBILE**

**RESPONSES AND OBJECTIONS TO TELECOMMUNICATIONS DIVISION
STAFF REPORT TO T-MOBILE**

COMES NOW T-Mobile USA, Inc., T-Mobile Central LLC and Powertel/Memphis, Inc. (collectively "T-Mobile") respectfully responds to the Alternative Provider Information Requests ("Information Requests") issued by the Illinois Commerce Commission ("Illinois Commission") Telecommunications Division Staff ("Staff") dated October 8, 2008 in the above referenced matter.

GENERAL OBJECTIONS

T-Mobile objects to the definitions, instructions, and Information Requests to the extent that they:

- a. seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence;
- b. are overbroad, unduly burdensome, harassing, expensive, oppressive or otherwise seek information that exceeds the scope of this proceeding or the requirements of the applicable administrative procedure rules;
- c. do not seek access to facts, seek a legal conclusion, call for speculation, or are premature;
- d. seek information that constitutes a trade secret, business plans, is proprietary or confidential, or is privileged under the attorney-client, work-product, or other privileges.
- e. are vague, ambiguous, or contain undefined terms;
- f. seek information that you already possess, or have access to, or seeks information that is publicly available;

g. seek information or documents not in its possession, custody or control;

h. request “all” documents or “all” persons on the grounds that discovery has not been completed;

i. call for speculation or is premature at the current state of the proceeding; or

j. call for a special study and collection of information.

T-Mobile incorporates these general objections and definitions by reference in each of its individual responses set forth herein and produced hereafter in this proceeding. In addition to each of the foregoing, T-Mobile reserves its objections to the Commission issuing Requests seeking information on services over which the Illinois Commerce Commission does not have jurisdiction. Notwithstanding each of these objections, and T-Mobile’s reservation of its rights with regard to the Commission’s authority to make these Information Requests, T-Mobile has attached hereto its responses to the Staff’s requests.

Dated: October 20, 2008

Respectfully submitted,

T-Mobile USA, Inc., T-Mobile Central LLC
and Powertel/Memphis, Inc.



Henry T. Kelly
Kelley Drye & Warren, LLP
333 W. Wacker Dr.
Chicago, Illinois 60606
(312) 857-2350
HKelly@Kelleydrye.com

Docket No. 08-0570
T-Mobile Response to Staff Information Requests

STAFF-T-MOBILE-1

1. Offered Network Access Line Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below) please:

- a. Indicate whether you offer any service that includes a residence network access line including, but not limited to, ala carte residence network access lines and packages containing residence network access lines and, if so, please provide a brief description of all such service offerings;

RESPONSE: No.

- b. Provide the total number of services, by exchange, described in Question 1.a that your company provided/sold on June 30, 2008. Please specify the platform used to provide these services (e.g., resale, UNE-L, UNE-P, LWC, special access, end-to-end facilities). If more than one platform is used to provide these services, please provide counts of services, by exchange, for each type of platform;

RESPONSE: Not applicable.

- c. Provide, by exchange, the prices charged to end users for the services described in Question 1.a (please provide the total prices assessed by the Company to the consumer including any taxes, fees, surcharges, etc.);

RESPONSE: Not applicable.

- d. Identify whether you offer residential Call Waiting and/or Talking Call Waiting. Please indicate whether the service is offered on an ala carte basis, as part of packages of services, or both and the prices, by exchange, for these services;

RESPONSE: Not applicable.

- e. Identify whether you offer residential Caller ID and/or Caller ID with Name. Please indicate whether the service is offered on an ala carte basis, as part of packages of services, or both and the prices, by exchange, for these services.

RESPONSE: Not applicable.

Dated: October 17, 2008

Responsible Person: Garnet Hanly

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2. Offered ISDN Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs, 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below) please:

- a. Indicate whether you offer any service that includes a residence ISDN service including, but not limited to, ala carte residence ISDN service and packages containing residence ISDN service;

RESPONSE: No.

- b. Provide the total number of services, by exchange, described in Question 2.a that your company provided/sold on June 30, 2008. Please specify the platform used to provide these services (e.g., resale, UNE-L, UNE-P, LWC, special access, end-to-end facilities). If more than one platform is used to provide these services, please provide counts of services, by exchange, for each type of platform; and

RESPONSE: Not applicable.

- c. Provide, by exchange, the prices charged to end users for the services described in Question 2.a (please provide the total prices assessed by the Company to the consumer including any taxes, fees, surcharges, etc.)

RESPONSE: Not applicable.

Dated: October 17, 2008

Responsible Person: Garnet Hanly

Docket No. 08-0570
T-Mobile Response to Staff Information Requests

STAFF-T-MOBILE-3(a)

3. Offered Residence Wireless Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs, 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below):

- a. Please indicate whether you offer any residence wireless service in the entire exchange, in part of the exchange, or not at all in the exchange, respectively and provide a brief description of all such service offerings;

RESPONSE: T-Mobile objects to this Information Request because the term “residence” is vague and imprecise and would require T-Mobile to speculate as to its meaning in any response. T-Mobile does not monitor whether customers use its services for residential or business purposes so it is unable to qualify whether it is “residence wireless service” or business wireless service. Furthermore, T-Mobile objects to the Information Request in the format requested because T-Mobile does not maintain such information by exchange and would require T-Mobile to create documents and information not in existence at the time of this Information Request and would require extensive time and effort to create such information. Notwithstanding the foregoing objections, T-Mobile offers wireless service in the locations designated on the coverage map found at www.t-mobile.com/coverage, which provides wireless signal strength at the street level. Additionally, T-Mobile provides a listing of the various services offered at www.t-mobile.com.

Dated: October 17, 2008

Responsible Person: Garnet Hanly

Docket No. 08-0570
T-Mobile Response to Staff Information Requests

STAFF-T-MOBILE-3(b)

3. Offered Residence Wireless Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs, 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below):

- b. Please provide, by exchange, the number of residential customers to whom you provided wireless residence service on December 31, 2007.

RESPONSE: T-Mobile objects to this Information Request because the terms “residential” and “wireless residence service” are vague and imprecise and would require T-Mobile to speculate as to their meaning in any response. T-Mobile does not monitor whether customers use its services for residential or business purposes so it is unable to qualify whether it has a “residential customer” or business customer. Furthermore, T-Mobile objects to the Information Request in the format requested because T-Mobile does not maintain such information by exchange and would require T-Mobile to create documents and information not in existence at the time of this Information Request and would require extensive time and effort to create such information. Wireless carriers are not billed intercarrier compensation charges by exchange so there is no business reason for T-Mobile to monitor wireless customer count by exchange. Moreover, because of the unique, mobile quality of wireless service, T-Mobile customers’ billing address does not always dictate location of where the customer uses this service, so it would not only be extremely costly and timely to create information by exchange, but it also would not provide accurate information to pinpoint the use of service location. Notwithstanding the foregoing objections, T-Mobile directs the Staff to take administrative notice of the information filed by T-Mobile semi-annually in the Number Resource Utilization and Forecast Form 502 using T-Mobile’s Operating Company Number (“OCN”) 6529.

Dated: October 17, 2008

Responsible Person: Garnet Hanly

Docket No. 08-0570
T-Mobile Response to Staff Information Requests

STAFF-T-MOBILE-3(c)

3. Offered Residence Wireless Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs, 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below):

- c. Please provide the price charged to wireless residence customers for the services described in Question 3.a (please provide the total prices assessed by the Company to the consumer including any taxes, fees, surcharges, etc.).

RESPONSE: T-Mobile objects to this Information Request because the term “wireless residence service” is vague and imprecise and would require T-Mobile to speculate as to its meaning in any response. T-Mobile does not monitor whether customers use its services for residential or business purposes so it is unable to qualify whether it has a “residential customer” or business customer. Furthermore, T-Mobile objects to the Information Request in the format requested because T-Mobile does not maintain such information by exchange and would require T-Mobile to create documents and information not in existence at the time of this Information Request and would require extensive time and effort to create such information. Notwithstanding the foregoing objections, T-Mobile publicly discloses all the pricing for its services at www.t-mobile.com. T-Mobile customers are also responsible to pay all applicable federal and state taxes, fees and surcharges as well as a Regulatory Programs Fee of \$0.86 per month for unfunded federal programs. T-Mobile customers in Illinois (other than those living in Chicago) are assessed the following taxes and surcharges: Federal Universal Service Fee (as determined by the FCC), State 911 surcharge (as determined by the municipalities), Telecom Excise Tax and the Regulatory Program Fee. For those customers based in Chicago, Illinois, they would be assessed the following taxes/surcharges: Federal Universal Service Fee, Telecom Excise Tax, Utility User’s Tax, Local 911 Surcharge and the Regulatory Program Fee.

Dated: October 17, 2008

Responsible Person: Garnet Hanly

Docket No. 08-0570
T-Mobile Response to Staff Information Requests

STAFF-T-MOBILE-3(d)

3. Offered Residence Wireless Services: For each exchange in the AT&T Illinois ILEC service area within Illinois MSAs, 2, 3, 6, 7, 9, and 15 (see the list of exchanges provided below):

- d. Please indicate as explicitly as possible, for each exchange, areas where the services described in Question 3.a are unavailable (e.g., any dead spots in your service coverage area or any areas where the service is not offered).

RESPONSE: T-Mobile objects to this Information Request because the term “wireless residence service” is vague and imprecise and would require T-Mobile to speculate as to its meaning in any response. T-Mobile does not monitor whether customers use its services for residential or business purposes so it is unable to qualify whether it has a “residential customer” or business customer. Furthermore, T-Mobile objects to the Information Request in the format requested because T-Mobile does not maintain such information by exchange and would require T-Mobile to create documents and information not in existence at the time of this Information Request and would require extensive time and effort to create such information. Notwithstanding the foregoing objections, T-Mobile offers wireless service in the locations designated on the coverage map found at www.t-mobile.com/coverage, which provides wireless signal strength at the street level. Wireless service is subject to variables unique to wireless technology (e.g., foliage on trees, composition of buildings, routine maintenance of cell tower), so a consumer might experience a “dead spot” at one time of the day and have full or partial signal strength at another point in the day.

Dated: October 17, 2008

Responsible Person: Garnet Hanly